



DCASE

District of Columbia
Association for Special Education

A rising tide lifts all boats

DCASE OFFICIAL POLICIES

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POLICY COMPLIANCE

1.0 In support of the District of Columbia Association for Special Education’s mission (hereinafter referred to as DCASE) to protect the Association, its members, officers, directors and employees and to guide all of us as we work together, the following policies have been prepared, updated, revised, and now distributed to you. Each Board member and employee will receive a copy of this manual upon employment and/or in the case of Board members at the start of the board member’s term will be required to sign a “Receipt of Policy Manual” form indicating that they have read, understand, and agree to abide by DCASE policies. Subsequently, all Board members will review and sign acknowledgement of compliance with all official DCASE policies annually. At this same time, all board members will be asked to disclose any interests that could give rise to conflicts. The Board Secretary will assume responsibility to regularly and consistently monitor and enforce compliance with these policies; minimally this will occur annually and include maintaining documentation of such.

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ETHICAL PRACTICES

1.1 General Ethical Practices (included as a requirement of membership and renewal of annual membership)

Section 1: Member Responsibilities to Students and their Families

Members shall follow accepted patterns of professional conduct in relations with the students that they serve. This shall include but not be limited to the following:

1. Members may not guarantee results or make false claims;
2. Members will take every reasonable precaution to protect the physical and mental well being of the students served and to use all feasible resources to help promote their improvement and growth;
3. Members shall maintain the school or program's premise(s) and equipment in safe and clean condition;
4. Members shall have policies and procedures that guarantee confidentiality of all students and their families;
5. Members shall abide by and adhere to rules of funding agencies;
6. Members shall not exploit students by accepting them for special education or related services from which they cannot reasonably be expected to benefit or by continuing special education or related services unnecessarily.
7. Members shall deliver special education and related services in accordance with the each students IEP,
8. Members shall honor their financial commitments to all parties involved with the school or program;
9. Members shall strive to improve the staff's skill in the education of students and make available to the students, to those closely associated with them, and to colleagues, the benefits of the staff's professional expertise.
10. Members shall not require any fees by a parent as a prerequisite for the acceptance of the student for placement in the school or program.

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11. Members shall guard against conflicts of interests and shall neither accept nor give gifts, fees or other forms of gratuity for referrals.
12. Members shall not discriminate on the basis of race, color, sex, national origin, disability or any other basis prohibited by law.
13. Members shall uphold and maintain in all possible ways the highest professional standards.

Section 3: Member Responsibilities to Funding Agencies

In order to facilitate relationships that foster the growth of students, members shall work toward cooperative and collaborative relationships with all funding agencies. This shall include but not be limited to the following:

1. Members shall provide information requested in an application for a Certificate of Approval or renewal of a Certificate of Approval;
2. Members shall not provide false, misleading or incomplete information to a funding agency;
3. Members shall maintain accurate course and attendance records;
4. Members shall encourage participation in alternative dispute resolution forums to resolve billing issues with funding agencies;
5. Members shall notify the funding agency whenever any credible information is received regarding a student that would change the obligations of the funding agency (such as a change in status as a ward or a change of address to a location outside the District); parents and guardians shall be notified at the beginning of each school year that such information will be forwarded to the funding agency
6. Members shall encourage participation by funding agency in IEP meetings and, when the agency has not been in attendance, shall send documents from the meeting to the funding agency.
7. Members shall make students available to representatives of funding agencies for assessments and evaluations, at appropriate times.

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8. Members shall respond to requests by funding agencies for information necessary to receive reimbursement from federal sources.

Section 4: Member Responsibilities to DCASE

1. Members shall support the philosophy, organization and function of DCASE and its policies;
2. Confidential information and classified materials from the DCASE office or Executive Committee, or from an individual acting within his/her capacity as a member of DCASE shall not be shared with non-members without prior written approval from DCASE;
3. Members shall maintain helpful and cooperative relationships with other member organizations;
4. Members shall respond to requests for information from DCASE in a timely manner;
5. Members shall honor all financial commitments;
6. Members shall advocate for the education of the public regarding issues and trends in special education.
7. Members shall share expertise and materials and welcome professional visitations.
8. Members shall agree to abide by the PROCEDURES FOR RESOLVING REPORTS AND COMPLAINTS, attached as Appendix A.

Members shall strive to uphold these ethical practices, assist colleagues in upholding these ethics, and to be available to DCASE to work with other member schools or programs in meeting these practices and to provide the best possible environment for students.

Any act that is in violation of the spirit and purposes of this statement of ethical practices shall be considered to be unethical.

In consideration for the commitments above, DCASE, its officers, employees and agents make the following commitments to Members:

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1. To serve as a vigorous and effective voice for the community of nonpublic and special education charter schools;
2. To provide members with timely and relevant information and services;
3. To make every effort to minimize response time to a member's request for information or advice;
4. To maintain financial stability, use resources efficiently and eliminate duplication,
5. To maximize non-dues revenue through collaborative efforts with funding agencies, foundations and universities;
6. To keep information received from members in strictest confidence and to develop and maintain secure systems ensure the confidentiality of all information received from members;
7. To be mindful of potential or perceived conflicts of interest;
8. To actively seek members' views and take action based on feedback;
9. To hire staff and consultants who have integrity, creativity, initiative, respect and judgment.
10. To provide staff and consultants with training regarding the mission of DCASE and the members' programs.

PROCEDURES FOR RESOLVING REPORTS AND COMPLAINTS

- All members will sign the Statement of Ethical Practices as a basis for membership and annually for continuation of membership.
- If a member believes that another member has violated part of the Statement, he/she will write to the President of the Board and state the problem and the member involved. The President will consider complaints by members only.
- All format complaints and subsequent inquires will be confidential.
- The President will appoint a member of the Executive Committee to investigate the complaint, talk with each member involved and issue a recommendation or report to the Executive Committee.
- The Executive Committee may consider the following options: a dismissal of the complaint, or referral to the full Board of Directors for further action. The full Board of

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Directors may consider the following options: a dismissal of the complaint, mediation between the parties involved, a temporary dismissal of the member for a specific period of time, (member may petition to return), or termination of the membership.

- Any member of the Executive Committee or Board of Directors shall recuse himself or herself if he or she works for, consults with, or is the parent of a student who attends the school or program involved.
- The Board of Directors will issue a formal decision to the membership only if the outcome of the complaint is suspension or termination.

Approved by the DCASE Board – August 2007

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CONFLICT OF INTEREST

1.2 The Board of Directors of the District of Columbia Association for Special Education (DCASE) acknowledges that in serving DCASE they act, not in their own personal interests or in the direct interest of the member programs they may represent, but rather in the interest of DCASE and its mission.

Unless agreed upon by a majority vote of the Board as being in DCASE's best interest, Board Members, their relatives, and any related party may not benefit financially (directly or indirectly) from their positions as Board Members.

Of primary concern, the purpose of the conflict of interest policy is to protect DCASE's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Organization; or the interest of the member program he or she represents over the interests of DCASE itself or other member programs, or might result in a possible excess benefit transaction.

Accordingly, the following provisions are adopted.

Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

DISINTERESTED REVIEW: As a rule, the Board should try to accomplish its mission without any transaction with a Board Member which could be construed as a conflict of interest. If the Board wishes to make an exception, the Board Member involved should not be present for the discussion and Board action nor should he or she vote on the decision. The Board should

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assure that the benefits to the Board Member (directly or indirectly) do not exceed the value received by the nonprofit organization.

DISCLOSURE: Upon joining the DCASE Board, each Board Member shall complete the disclosure form. In addition, if any Board Member becomes aware that there are additional potential conflicts, he or she shall be responsible for disclosing those to the President in writing immediately (or orally if in a board meeting).

Records of Proceedings: The minutes of the governing board and all committees with board delegated powers shall contain: (a) the names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the governing Board's or committee's decision as to whether a conflict of interest in fact existed; and (b) the names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Annual Reporting: Each director, principal officer and member of a committee with governing board delegated powers shall annually sign a statement which affirms such person: (a) has received a copy of the conflicts of interest policy, (b) has read and understands the policy, (c) has agreed to comply with the policy, and (d) understands the Organization is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes

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ETHICS: WHISTLEBLOWER

1.3 Whistleblower Policy

The District of Columbia Association for Special Education (DCASE) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within DCASE prior to seeking resolution outside DCASE. As such, it is the responsibility of all directors, officers and employees to report ethics violations or suspected violations.

No Retaliation

No director, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Violations

DCASE has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. However, if employees are not comfortable speaking with their supervisor or are not satisfied with the supervisor's response, they are encouraged to speak with a member of the Board of Directors. Members of the Board of Directors are in turn required to report suspected ethics violations to the President of the Board. If there is an issue that involves the President, employees should report to another current Board Officer. The Vice President of the Board is responsible for investigating and resolving all reported complaints and allegations concerning violations.

The Vice President of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Vice President shall

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immediately notify the full Board of Directors of any such complaint and work with the Board until the matter is resolved.

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

The Vice President will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Policy approved by the DCASE Board of Directors by resolution on August 21, 2009.

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EQUAL EMPLOYMENT OPPORTUNITY

2.0 DCASE supports equal opportunity for all staff members. In accordance with state and federal law, DCASE will not discriminate against a staff member or applicant for employment because of race, disability, color, creed, religion, sex, age, sexual preference, national origin, ancestry, marital status, citizenship, veteran status, or non-job related factors in hiring, promoting, demoting, training, benefits, transfers, layoffs, terminations, recommendations, rates of pay or other forms of compensation. Opportunity is provided to all staff members based on qualifications and job requirements.

DCASE will not tolerate acts deemed to constitute discrimination or harassment based on gender, sexual preference, race, color, religion, national origin, marital status, age, disability, or any other characteristic protected by law.

Any person employed by DCASE who fails to comply with this policy is subject to disciplinary action.

DCASE will attempt to achieve and maintain a diverse work force. These steps may include, but are not limited to, the following:

1. Ensuring that DCASE's policy regarding equal employment opportunity is communicated to all staff members;
2. Ensuring that hiring, promotion, and salary administration practices are fair and consistent with the policy of DCASE; and
3. To the extent that the staff is not diverse, DCASE will make special recruitment efforts as part of this plan.

Each supervisor and member of the management staff must provide equal opportunity for all staff members with regard to work assignments, training, transfer, advancement, and other conditions and privileges of employment and to work to assure a continuation of this policy of equal employment opportunity.

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HARASSMENT

DCASE does not condone or excuse harassment of any kind. DCASE policy prohibits employees from discriminating against or harassing their colleagues based on gender, sexual preference, religion, mental or physical impairment, age, race, marital status, creed, color, or national origin. DCASE will take immediate steps to address complaints of sexual harassment, racist or ethnic slurs, or harassment based on age, disability, sexual preference, or any characteristic protected by law.

Sexual harassment is defined as unwelcomed or unwanted sexual conduct; requests for sexual favors; and verbal, nonverbal, or physical conduct of a sexual nature that adversely affects the employee's employment terms or conditions or creates an intimidating, hostile, or offensive work environment.

An employee who believes he or she has been the victim of any kind of harassment should report the incident immediately to the President of the Board of Director's. Anyone who retaliates against an employee who reports harassment will be subject to disciplinary action.

To resolve a complaint of sexual harassment informally, staff should either notify the offender that his or her behavior is unwelcome or, if that staff person is uncomfortable discussing it with the offender, he or she can notify any administrator.

To the extent possible, the complaints, interviews with colleagues, and any documents discovered or generated during the investigative process, will remain confidential. The results of the investigation will be reported to the Executive Director, who will determine a course of action. The response can include various kinds of disciplinary action, up to termination.

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If the alleged harasser is the Executive Director, contractor, consultant or subcontractor, a committee of the Board will be established to investigate the complaint and determine a course of action. The Committee will be charged with initiating and conducting the investigation within a reasonable period of time.

DCASE will conduct follow-up interviews to determine that corrective steps were taken and the issues were resolved.

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DCASE DOCUMENT RETENTION AND DESTRUCTION POLICY

3.0 In accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention and destruction of documents received or created by DCASE in connection with the transaction of organization business. This policy covers all records and documents, regardless of physical form.

DCASE follows the document retention procedures outlined in the following table. Documents that are not listed, but are substantially similar to those listed in the schedule will be retained for the appropriate length of time.

III. Corporate Records

Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
Board Policies/Resolutions	Permanent
By-laws	Permanent
Fixed Asset Records	Permanent
IRS Application for Tax-Exempt Status (Form 1023)	Permanent
IRS Determination Letter	Permanent
DC and State Sales Tax Exemption Letter	Permanent
Contracts (after expiration)	7 years
Accounting and Corporate Tax Records	Permanent
Annual Audits and Financial Statements	Permanent
Depreciation Schedules	Permanent
General Ledgers	Permanent
IRS 990 Tax Returns	Permanent
Business Expense Records	7 years
IRS 1099s	7 years

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Journal Entries	7 years
Invoices	7 years
Sales Records	5 years
Petty Cash Vouchers	3 years
Cash Receipts	3 years
Credit Card Receipts	3 years
Bank Records	Permanent
Check Registers	Permanent
Bank Deposit Slips	7 years
Bank Statements and Reconciliation	7 years
Electronic Fund Transfer Documents	7 years
Payroll and Employment Tax Records	Permanent
Payroll Registers	Permanent
State Unemployment Tax Records	Permanent
Garnishment Records	7 years
Payroll Tax returns	7 years
W-2 Statements	7 years
Employment and Termination Agreements	Permanent
Retirement and Pension Plan Documents	Permanent
Records Relating to Promotion, Demotion or Discharge	7 years after termination
Accident Reports and Worker's Compensation Records	5 years
Employment Applications	3 years
I-9 Forms	3 years after termination
Donor Records and Acknowledgement Letters	7 years
Grant Applications and Contracts	5 years after completion
Copyright Registrations	Permanent
Insurance Policies	Permanent
Trademark Registrations	Permanent
Leases	6 years after expiration

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OSHA Documents	5 years
General Contracts	3 years after termination

Electronic documents will be retained as if they were paper documents.

DCASE records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping DCASE operating in an emergency will be duplicated or backed up at least every month and maintained off site.

The DCASE Treasurer is responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against DCASE and its employees and possible disciplinary action against responsible individuals. The Treasurer and finance committee chair will periodically review these procedures with legal counsel or the organization’s certified public accountant to ensure that they are in compliance with new or revised regulations.