

INTERNAL MONITORING REPORT

January 20, 2016

Policy: **2.5 Asset Protection**
Policy Category: **Operating Limitations**
Period Monitored: **July 1, 2014 to June 30, 2015**

This is my monitoring report on the Board of Education's Executive Limitation policy "Asset Protection." I certify that the information contained in this report is true and complete and presented in accordance with the routine monitoring report schedule. This report will monitor the policy starting at its more detailed provisions and end with the global provision.

Christopher E. Gdowski
Superintendent

Date: January 13, 2016

- POLICY PROHIBITION:** Shall not fail to insure against theft and casualty losses of property owned or used by the district, and to insure and indemnify, in a board approved manner, against liability losses to Board members, staff and the organization itself.

Interpretation: The following interpretation has not changed since the last report.

I interpret “*shall not fail to insure against theft and casualty losses of property owned or used by the district*” to mean: The District has in place insurance contracts to replace, repair, or provide financial remuneration for the district’s assets exceeding \$1,000.00. The level of coverage restores the district to an equal or similar position prior to the loss or damage to the asset, less the deductible. The insurance replaces assets stolen, damaged or destroyed with a minimum value that meets or exceeds the deductible limitations of the insurance coverage, and includes the replacement of real estate, facilities, fixtures, furniture, equipment and consumable assets (i.e. textbooks, computer components, etc.) owned or leased by the district with a value greater than \$1,000.00.

Data Reported: The Adams County BOCES policy limits, deductibles and retention amounts are commensurate with insurance programs at similarly situated school districts. These comparisons indicate the BOCES retentions of \$100,000 for property, \$150,000 for general liability, \$550,000 for Workers’ Compensation and \$250,000 for Errors and Omissions are adequate.

E&O covers a number of loss events and the policy coverage runs from \$150k to \$10MM. Other coverages include Employee Dishonesty and Cyber Crime. Again, these coverages depend on the loss event. The coverage runs from \$25k to \$1MM.

The District has in place the following insurance contracts:

	<u>Limitations</u>	<u>Deductible</u>
Commercial General Liability	\$10,000,000	No deductible
Auto Liability	\$5,000,000	No deductible
Property	\$100,000,000	\$1,000 Deductible

Compliance Statement: The District’s performance complied with the standard.

Interpretation: The following interpretation has not changed since the last report.

I interpret “*shall not fail to insure against liability losses to Board members, staff and the organization*” to mean: Appropriate policies are in place and all claims against the policies are resolved. The district has in place insurance policies to cover acts of litigation, settlements, judgments and staff injuries resulting in financial remuneration by the district. The policies provide coverage for these acts to the extent available through insurance contracts and provide coverage in amounts consistent with industry standards. There are certain acts that are not insurable.

Data Reported: The Adams County BOCES policy limits are consistent with industry standards and deductibles and retention amounts are commensurate with insurance programs at similarly situated school districts.

Policies in place include:

	<u>Limitations</u>	<u>Deductibles</u>
Worker's Compensation	Statutory	No deductible
Errors & Omissions Insurance (E&O)	\$10,000,000	\$10,000

Compliance Statement: The District's performance complied with the standard.

- 2. POLICY PROHIBITION:** Shall not fail to fund, annually, preventative maintenance, minor repair, and unscheduled maintenance at no less than one percent (1%) of the prior year's projected replacement value, and maintain the plant with due care in a manner that ensures facilities are open for scheduled student/staff contact days. The projected cost of total deferred maintenance shall not exceed ten percent (10%) of the projected replacement value. Furthermore, funds allocated for the purpose of maintaining the plant shall accrue year to year to a maximum of three percent (3%) of the projected replacement value of the plant; these funds shall be deemed a plant contingency fund and shall not be transferred, spent, or reallocated for any other purpose without prior approval of the board of education.

Interpretation: The following interpretation has changed since the last report.

I interpret:

"shall not fail to fund" to mean: Financial resources shall be allocated annually from the General Fund for the general purpose of maintaining the plant.

"Plant" to mean: All district facilities including, buildings, building systems, utilities, and site improvements.

"maintain the plant with due care" to mean: Financial resources allocated to Facilities Maintenance are expended for preventative maintenance, minor repair, and unscheduled maintenance in a manner that best maintains the Plant.

"in a manner that ensures facilities are open for scheduled student/staff contact days" to mean: The plant is operational and functioning in the capacity necessary at a rate of ninety-nine percent (99%) of the 1,080 hours and 990 hours of annual instructional time for a secondary and elementary school, respectively.

"total deferred maintenance" to mean: The cost of major repair and replacement tasks not performed according to their prescribed lifecycle frequency, plus the compounded costs associated with degradation resulting from maintenance that was unable to be completed due to the lack of human or financial resources.

"funds allocated for the purpose of maintaining the Plant shall accrue year to year," to mean: The remaining balance of funds allocated annually for Facilities Operations and Maintenance in any fiscal year and all prior fiscal years shall be transferred to a Plant Contingency Fund to be used for maintaining the plant with due care, facility program changes, and replacement of capital equipment.

Data Reported: *“Shall not fail to fund, annually, preventative maintenance, minor repair, and unscheduled maintenance at no less than one percent (1%) of the prior year’s Projected Replacement Value.”*

The FY (2014-15) Projected Replacement Value (PRV) of the Plant was \$1,008.6 million. For the reporting period the adopted budget for preventative maintenance, minor repair and unscheduled maintenance was \$5.99 million or 0.59 percent of the prior year's PRV, which is \$4.1 million deficient of the 1% requirement.

Compliance Statement: The District’s performance did not comply with the standard.

“and maintain the Plant with due care”

The Facilities Maintenance budget was allocated \$5.99 million (1) in the 2014-15 FY budget. A net total of \$6.1 million (2)-(5) was expended for direct labor, indirect labor, employee benefits, supplies, contractors, management and office support for the performance of 17,484 work orders completed during the monitoring period. 5,434 were preventative and minor work orders and 8,964 were for unscheduled maintenance work orders and 947 were for construction/project related work orders and 2,130 other work orders* were performed. 90.2% of all work orders were performed at schools and 9.8% were performed at support facilities.

**Other work orders are for snow removal, graffiti removal, vandalism, etc.*

Accounting for all funds in the 2014-15 FY Facility Maintenance budget:

2014-2015 Budget	Expenditures and Transfers Out	Funding and Transfers In
(1)2014-2015 Budget Allocation		\$ 5,989,800
(3)Funding for Prior Year Encumbrances	\$ (192,400)	\$ 800
(4)Maintenance projects Transfers	\$ (95,100)	
(5)Maintenance Billings for Self-Performed projects		\$ 475,600
(2) 2014-2015 Total Maint. Exp. for W.O. Performance	\$ (6,560,200)	
<i>Funds Remaining</i>		
(6) Funds Over/(Under) Budget in Fund 10	\$ 381,500	
	\$ (6,466,200)	\$ 6,466,200

The maintenance budget ended the year with encumbrances in an amount of \$192,400(3) which were carried forward to 2015-16. Maintenance transferred \$95,100(4) to projects, reducing the funds available to the Facility Operations and Maintenance budget. The maintenance department self-performed projects billed to other budgets in the amount of \$475,600(5). Funds remaining at the end of FY 14-15 equaled -\$381,500(6) in fund 10 and Mill Levy override funds 17 and 18.

Compliance Statement: The District’s performance complied with the standard.

“in a manner that ensures facilities are open for scheduled student/staff contact days”

The District’s Communication Center call and maintenance records indicated 0.5 (one half) facilities-related school closure(s) on scheduled student/staff contact days during the monitoring period.

Compliance Statement: The District’s performance complied with the standard.

“...and total deferred maintenance shall not exceed ten percent (10%) of the Projected Replacement Value.”

The total deferred maintenance (including degradation) estimated by MARS for the reporting period is \$86.3 million or 8.6% of the FY 2014-2015 PRV of \$1,008.7 million. This represents an increase in deferred maintenance of \$2.97 million from FY 2013-14 to FY 2014-15.

Compliance Statement: The District’s performance complied with the standard.

“funds allocated for the purpose of maintaining the Plant shall accrue year to year.”

On June 30, 2015 the balance of FY 2014-15 funds allocated for Facility Operations and Maintenance was \$381,500(6). This amount was transferred to the Plant Contingency fund in the 15/16 FY budget. Current Plant Contingency of \$1.4 million or 0.14% of the PRV does not exceed the stipulated maximum 3.0% of PRV.

Compliance Statement: The District’s performance complied with the standard.

- 3. POLICY PROHIBITION:** *Shall not fail to maintain equipment with due care to provide necessary services for student/staff contact days and essential District operations or to fund said maintenance with adequate resources on an annual basis.*

Interpretation: The following interpretation has changed since the last report.

I interpret: *“Shall not fail to maintain equipment with due care”* to mean: Financial and human resources for the maintenance and upkeep of equipment are expended for personnel, materials, and contract services necessary to maintain, monitor, and repair equipment in a manner consistent with manufacturer requirements.

“equipment” to mean: The following capital assets; (A) student transport vehicles, (B) **Information technology infrastructure** (computer network switches, routers, servers, storage systems, communication systems (email, telephone, website), software (such as PeopleSoft Finance, PeopleSoft HR, IEP System, **Early Warning System, Educator Resource Center, and Infinite Campus**), and **cloud-based Internet applications (such as Google, Educator Effectiveness, SchoolDude, Schoology)**

“to provide necessary services” to mean: Equipment is operational for the support of student/staff contact days and essential District operations.

“student/staff contact days” to mean: Ninety-nine percent (99%) of the 1,080 hours and 990 hours of annual instructional time for a secondary and elementary school, respectively.

“essential District operations” to mean: The District is able to perform its legal and fiduciary duties. i.e. (transport students safely, meet payroll requirements, meet financial and human resource obligations, CDE reporting, communicate critical information to parents, students and staff, and provide fire and intrusion monitoring).

“or to fund said maintenance with adequate resources on an annual basis” to mean: Sufficient financial and human resources are allocated yearly to ensure equipment is operational in the manner necessary to provide services to students/staff without unnecessary interruption.

Data Reported: (A) CDE Annual Student Transport Vehicle Inspections. CDE regulations require all vehicles used for student transportation to receive a comprehensive safety inspection every 365 days. The measure of compliance for annual inspections is 99 percent.

CDE Annual Inspection Reporting Timeframe: July 1, 2014 - June 30, 2015		
Completed on time	141	96%
Completed late	6	4%
Total Inspections	147	100%

96% of all (32+capacity) student transport vehicles met the preventative maintenance standard required by CDE for student transportation. There were no instances of lost instructional time due to insufficient preventative maintenance or equipment failures of student transport vehicles.

Compliance Statement: The District’s performance complied with the standard.

The measure of compliance for preventative maintenance of student transport vehicles is ninety percent (90%) of all vehicles will have preventive maintenance completed within 6 months after the annual CDE inspection. Preventative maintenance schedules are evaluated and adjusted to align with CDE guidelines and manufacturers’ recommendations.

Completion of preventative maintenance: July 1, 2014 - June 30, 2015		
Completed within 6 months after CDE inspection	91	69%
Completed late	41	31%
Total Preventative Maintenance Performed	132	100%

The Fleet Department was unable to meet the 90% standard of the preventative maintenance inspections. No vehicles went more than two days beyond the required completion date and no students were transported until the vehicle inspection was completed.

Compliance Statement: The District’s performance *does not* comply with the standard.

Compliance with this standard is expected to be met within the next reporting period. Non-compliance is attributed to the fact that during the monitoring period the Fleet Maintenance team had two Sr. Technicians out for extended periods due to medical issues. Fleet does not have additional funds available to hire temporary or substitute mechanics during these absences. Additionally some delays were attributed to abnormal parts delays by manufacturers. Fleet Maintenance is now fully staffed and we anticipate compliance with 2.5.3 during the 15/16 monitoring period.

(B) Information technology infrastructure (computer network switches, routers, servers, storage systems, communication systems (email, telephone, website), software (such as PeopleSoft Finance, PeopleSoft HR, IEP System, Early Warning System, Educator Resource Center, and

Infinite Campus), and cloud-based Internet applications (such as Google, Educator Effectiveness, SchoolDude, Schoology).

Data Reported: (B) *Shall not fail to maintain equipment with due care to provide necessary services for student/staff contact days and essential District operations or to fund said maintenance with adequate resources on an annual basis.*

With the completion of many of the milestones in regard to the ongoing improvements to our datacenters and network, the standard of 99% uptime during instructional time with these systems was exceeded, with one exception*, the majority of service interruptions occurring in a planned manner (to ensure ongoing maintenance) outside of instructional time. (Please see the section dealing with Policy Prohibition 5 in this report, as it sheds more light on how this uptime is achieved.)

*The phone system, which is well beyond end-of-life, was the only system in this list that did not meet the standard of 99% uptime, due to the unplanned interruptions or outages (resulting from equipment failures) that occurred during instructional time. The failures have been mitigated for the time being and the phone system is stable, and the IT department has been working on a pilot for replacement system that can be scaled up for full district implementation once funding is available. It is due to the phone system's extended failures that we will not be in compliance with this standard.

Compliance Statement: The District's performance does not comply with the standard.

- 4. POLICY PROHIBITION:** *Shall not make any purchase: (a) wherein normally prudent protection has not been given against conflict of interest; (b) of any material amount without having obtained comparative prices and quality; or without a stringent method of assuring the balance of long term quality and cost.*

Interpretation: The following interpretation has changed since the last report.

I interpret "Shall not make any purchase: (a) wherein normally prudent protection has not been given against conflict of interest; (b) of any material amount without having obtained comparative prices and quality; or without a stringent method of assuring the balance of long term quality and cost" to mean: The district has superintendent policies and procedures that expenditures meeting or exceeding \$5,000 for any transaction are subject to a competitive bid process. The competitive process includes the development of product/service specifications to ensure the level of quality required. The purchasing process incorporates the appropriate competitive process, an Invitation to Bid, a Request for Proposal (RFP), phone quote, competitive negotiation, email quote or fax quote. A minimum of three qualified bidders are required for each purchase except for sole source, *single source and emergency purchases (if approved by the signature authorities on the Procurement Deviation Justification (PDJ) Form)* or items that have less than three qualified vendors, which typically are service related or specialized products such as proprietary software.

***New Federal rules went into effect on July 1, 2015, with regards to purchasing guidelines for federally funded/grant funded purchases. As a result, Superintendent Policy 3320 was updated in August of 2015 to specify the new changes. The bid threshold for federally funded/grant funded purchases greater than \$3,000 must follow the District's threshold*

guidelines and competitive processes outlined in the policy. These changes will be reflected on the 2.5 Monitoring Report next year.

Data Reported: Superintendent Policies (3300 – 3340) regarding conflicts of interest and competitive bidding/acquisition are in place, available through the District website, the Purchasing Webpage, the Purchasing SharePoint Page, and employees are trained. Training occurs at Support Our Staff Group (SOS Group) meetings periodically throughout the year, as well as other departmental training, including a Purchasing 101 course that was offered Fall 2015 through Business Services University (BSU). Policies are consistent with the National Institute of Governmental Purchasing (NIGP) code of ethics and procurement standards for governmental purchasing. The District’s Purchasing Department maintains records regarding all district purchases using purchasing cards, requisitions and purchase orders. Purchasing staff review transactions greater than \$5,000 for compliance with the policy requirements. The performance standard is that 99% of all transactions meet the purchasing policy requirements. *There were 885 transactions either by Purchase Card, Declining Balance Card or by Purchase Order that met or exceeded the \$5,000 threshold and thus required bid or other competitive process. There were nine (9) known violations equaling 1.02% of all transactions reported during this time period.*

Compliance Statement: The District’s performance does not comply with the standard.

5. POLICY PROHIBITION: *Shall not fail to protect intellectual property, information and files from loss or significant damage.*

Interpretation: The following interpretation has not changed since the last report.

I interpret “*shall not fail to protect intellectual property, information and files from loss or significant damage*” to mean: The district shall employ industry standard measures to protect district data and other information assets both on-premises as well as in the cloud (Internet). This includes not only data sitting on drives, but also data that is in transmission on the district network, and on the Internet. The measures include firewalls, backup systems, virus protection, content filtering, encryption, and other generally accepted best practices for Information Assurance such as security audits and penetration testing.

Data Reported: No loss or damage with regard to District’s intellectual property, information or files has been reported in this period. The District went through a significant external security audit conducted by a national consulting firm that critiques the security posture of organizations in the public and private sectors.

While the challenge in this space is enormous, the District has many solutions in play to help address the challenge, including:

No.	Item	Description	Benchmarks / Benefits
1.	Active/Active Datacenters	Primary and Secondary Data-Centers process and store the vast majority of district data. Redundant power systems are deployed at both	All in-district data resources can operate fully from one or the other data center providing high availability in physically

		datacenters. Redundant cooling systems are deployed in the Primary Datacenter.	secured and climate-controlled environments
2.	Next Generation Firewall	Protects in-district assets from internet-based attackers. Observes, alerts, and blocks threats both into and out of the district.	Approximately 40,000 attacks per month defended.
3.	Enterprise Backup	Redundant backup architecture backs up all in-district data housed in the data-center.	45 Terabytes of active data (each night) and 340 Terabytes of raw data are backed up. Encrypted off-site backup tapes are sent to a third party vault on a weekly basis.
4.	Virtualization	The majority of all in-district servers (400+) are virtualized resulting in reduced costs in physical hardware, as well as heating and cooling.	Virtualization allows the expanded use of server hardware and storage at the two data-centers, allowing us to meet peak demand and provide real-time disaster recovery in a cost-effective manner.
5.	Digital Review of Applications	Educational applications to be used in classrooms (and office applications) are reviewed for security vulnerabilities.	250+ applications have been approved, and many more are pending review at this time.
6.	Automated Patch Management	Patching allows us to reduce security vulnerabilities on a regular basis with the tens of thousands of district computers and servers.	Over 20,000 managed systems are automatically patched via these two systems.
7.	Continuous monitoring	Servers and services are monitored 24 x 7 x 365 by automated systems that alert personnel to events requiring attention.	This covers 631 servers and 3600 services.
8.	Coordinated Incident Response	Incidents causing service interruptions are rapidly managed and controlled under the management of a Certified Incident Handler	All Incidents are documented and logged, including symptoms, remediations, and root cause(s).
9.	Antivirus	All servers and workstations operate with a current, auto-updating, enterprise-class Antivirus solution	This covers 20k+ computers and 600+ servers.
10.	Encryption	District web services that process Personally Identifiable Information (PII) use industry-standard encryption technologies, to reduce the ability of hackers to get such data.	SQL and off-site backups are encrypted with a currently unbreakable encryption scheme.
11.	Reverse Proxy/Load Balancers	External access to in-district resources is filtered through a Reverse Proxy/Load balancer.	This reduces the attack surface of these resources, and makes them less vulnerable to hackers.

12.	Log Aggregation	Major servers, services and system logs are regularly aggregated to facilitate incident response	This allows access to large amounts of historical and real-time data on our systems, for process improvement purposes.
13.	Network Access Controls	Employee access to network and district resources is strictly authenticated, accounted and audited	This ensures that we can keep track of who is doing what on our network.
14.	Regular Maintenance	There are multiple windows each month when the datacenters are shut down partially or completely to ensure all systems are up to date in terms of security protocols and maintenance parameters, and new software updates can be applied to help enhance district productivity.	This has been a major contributor in ensuring that recent investments in this infrastructure are kept up to date, and in minimizing / eliminating any interruptions during the school day.

Compliance Statement: The District’s performance complied with the standard.

6. POLICY PROHIBITION: *Shall not fail to timely apprise the board of any contemplated property (real or otherwise) asset acquisition of \$250,000 or disposition in excess of \$100,000.*

Interpretation: The following interpretation has not changed since the last report.

I interpret “*shall not fail to timely apprise the board of any contemplated property (real or otherwise) asset acquisition of \$250,000 or disposition in excess of \$100,000.*” to mean: The district shall provide notification to the board through regular correspondence from the Superintendent at the time when district staff engages in the due diligence process in the event of a potential acquisition of property (real or otherwise) of \$250,000 or a disposition of property (real or otherwise) in excess of \$100,000.

Data Reported: The Board of Education was apprised in writing on 3/11/2015 that the district was contemplating the acquisition of the Stargate Charter School. After due diligence and program capacity evaluation were completed the decision was made to not move forward with the acquisition.

Compliance Statement: The District’s performance complied with the standard.

7. POLICY PROHIBITION: “*shall not fail to gain board approval of property (real or otherwise) asset acquisition of \$250,000 or disposition of \$100,000.*”

Interpretation: The following interpretation has not changed since the last report.

I interpret “*shall not fail to gain board approval of property (real or otherwise) asset acquisition of \$250,000 or disposition of \$100,000.*” to mean: The district shall gain

approval of the board through board action prior to acquisition of property (real or otherwise) of \$250,000 or a disposition of property (real or otherwise) in excess of \$100,000.

Data Reported: The District did not acquire or dispose of any property real or otherwise meeting the requirement during the monitoring period.

Compliance Statement: The District's performance complied with the standard.

- 8. POLICY PROHIBITION:** *Shall not acquire—including acceptance of any gift of, purchase or lease of, or improvement to—real estate, or act as surety for any of the foregoing: (a) in excess of the market value of the property; (b) in violation of a comprehensive, current build-out plan; (c) without appropriately considering the needs and preferences of local school communities, cities, counties, fire districts and related entities; (d) without prior professional due diligence of the highest quality similar to that of organizations engaged in commercial real estate activities; (e) that, after that level of due diligence, subjects the District to any unanticipated or unintended on-site, off-site, operating, or other costs; (f) if the transaction is financially infeasible; or (g) that is not safe, accessible or functional thereafter.*

Interpretation: The following interpretation has not changed since the last report.

I interpret “a) *Shall not acquire – including acceptance of any gift of, purchase or lease of, or improvement to – real estate, or act as surety for any of the foregoing: (a) in excess of the market value of the property;*” to mean: The district does not acquire property without assurance that the value is considered at market value defined as being consistent with appraised value provided by a Colorado certified appraiser or through negotiations using real estate and legal professionals who primarily practice or specialize in the area of real estate brokerage, sales, development, planning or law. This is consistent with best practices used by professionals in the real estate industry. The district does not acquire property in excess of market value, or without using professionals who primarily practice or specialize in the area of real estate, unless these exceptions are disclosed to and approved by the Board of Education.

Data Reported: The district did not acquire any property during the monitoring period.

Compliance Statement: The District's performance complied with the standard.

Interpretation: The following interpretation has not changed since the last report.

I interpret “(b) *in violation of a comprehensive, current build-out plan; (c) without appropriately considering the needs and preferences of local school communities, cities, counties, fire districts and related entities;*” to mean: The district does not acquire real estate that does not provide a current or future benefit to the district consistent with the district build out plan. The build out plan projects future needs for schools and facilities based upon growth in student enrollment. *Furthermore*, the District does not acquire or improve real estate without providing timely notice of such proposed acquisition/improvement to the appropriate city manager, planning commission, city council, fire chief, and/or chief executive of a special district and *without* making good faith efforts to address items of concerns identified by such persons.

Data Reported: The district did not acquire any property during the monitoring period.

Compliance Statement: The District's performance complied with the standard.

Interpretation: The following interpretation has not changed since the last report.

I interpret “*d) without prior professional due diligence of the highest quality similar to that of organizations engaged in commercial real estate activities; (e) that, after that level of due diligence, subjects the District to any unanticipated or unintended on-site, off-site, operating, or other costs;*” to mean: The district contracts with professionals licensed in the State of Colorado, if applicable, to provide professional due diligence including but not limited to, ALTA surveys, geotechnical reports, title policies, property legal descriptions, zoning maps, environmental assessments, traffic reports, utility reports, investigation for the presence of wetlands, and other analyses as required by unique site conditions. The district maintains checklists to ensure a comprehensive due diligence process is followed.

Data Reported: The district did not acquire any property during the monitoring period.

Compliance Statement: The District's performance complied with the standard.

Interpretation: The following interpretation has not changed since the last report.

I interpret “*(f) if the transaction is financially infeasible; or (g) that is not safe, accessible or functional thereafter;*” to mean (f) the cost to acquire property is not in the best economic interest of the district because the cost would outweigh the benefit of the acquisition and/or the district would not have sufficient financial resources for the acquisition. (g) The condition of the property would preclude the property from being developed in a manner consistent with all applicable safety and state building codes necessary for Certificate of Occupancy or other appropriate designations for the safe usage of property.

Data Reported: The district did not acquire any property during the monitoring period.

Compliance Statement: The District's performance complied with the standard.

- 9. POLICY PROHIBITION:** *Shall not dispose of—including any gift of encumbrance of or granting of title exceptions to-any real estate owned, leased, or used by the District, or for which the District acts as surety; (i) for compensation less than the sum of the market value of the property interest disposed plus any reduction in the market value of property or operations retained; (ii) if items 8(b)-8(e) above are not observed; (iii) or if any remaining District property and operations become financially infeasible, unsafe, inaccessible or dysfunctional thereafter.*

Interpretation: The following interpretation has not changed since the last report.

I interpret “*Shall not dispose of—including any gift of encumbrance of or granting of title exceptions to-any real estate owned, leased, or used by the District, or for which the District acts as surety; (i) for compensation less than the sum of the market value of the property interest disposed plus any reduction in the market value of property or operations retained;* to mean: The district does not relinquish property ownership without assurance that the

value received is considered to be at market value unless a proposed purchase in excess of market value is disclosed to and approved by the Board of Education. Market value is defined as being consistent with appraised value provided by a State of Colorado certified appraiser or through negotiations using real estate and legal professionals who primarily practice or specialize in the area of real estate brokerage, sales, development, planning, or law. In addition, the disposal of said property must not reduce the market value of any remaining district property retained.

Data Reported: The district did not dispose of any property during the monitoring period.

Compliance Statement: The District's performance complied with the standard.

Interpretation: The following interpretation has not changed since the last report.

I interpret "(iii) or if any remaining District property and operations become financially infeasible, unsafe, inaccessible or dysfunctional thereafter" to mean: The district does not relinquish property ownership if conditions cause remaining property to have an economic disadvantage to the district. The district does not relinquish property ownership if conditions cause remaining property conditions that pose hazards for the District's use of the property that are financially infeasible to remedy. Property disposed of by the district will provide an equal value or a net economic advantage.

Data Reported: The district did not acquire or dispose of any property during the monitoring period.

Compliance Statement: The District's performance complied with the standard.

Global Policy: *The Superintendent shall not allow assets to be unprotected, inadequately, maintained or unnecessarily risked. Further, without limiting the scope of the foregoing by this enumeration, he or she shall not:*

I submit that the Board's policy is comprehensively interpreted in the preceding provisions. This is reasonable because my interpretations, data reported and compliance statements are presented with those provisions above.

Compliance Statement: The District's performance complied with the standard.

The Board acknowledged receipt of a monitoring report as of January 20, 2016, for the period July 1, 2014 through June 30, 2015, of the Superintendent concerning Board Policy 2.5 Asset Protection and found the superintendent's interpretations were reasonable and that his conclusions are reasonably supported by data that was relevant, justified and complete.