

INTERNAL MONITORING REPORT

January 16, 2019

Policy: **2.5 Asset Protection**
Policy Category: **Operating Limitations**
Period Monitored: **July 1, 2017 to June 30, 2018**

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 10, 2019

1. 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 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 policies to replace, repair, or provide financial remuneration for damage to district buildings and their contents exceeding \$25,000 and damage to district vehicles exceeding \$1,000. 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 facilities, fixtures, furniture, equipment and consumable assets (i.e. textbooks, computer components, etc.) owned or leased by the district.

Data Reported: The district is now a member of the Colorado School District Self Insurance Pool (CSDSIP), for General Liability, Auto, Property and Errors and Omissions. Policy limits, deductibles and retention amounts are commensurate with insurance programs at similarly situated school districts.

Other coverages include Employee Dishonesty, Cyber Crime, Acts of Terrorism, School Crisis Act and Pollution and Remediation. Again, these coverages depend on the loss event. The district also has a Foreign Travel Policy to assist employees and students in the event of an adverse incident during out of country travel.

Insurance contracts in place with CSDSIP:

	Limitations	Deductible
Commercial General Liability	\$10,000,000	\$25,000
Auto Liability	\$5,000,000	\$1,000
Property	\$881,170,762	\$25,000

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

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

I interpret “*shall not fail...to insure and indemnify, in a board approved manner, against liability losses to board members, staff and the organization itself*” to mean: Appropriate policies are in place 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 policies and provide coverage in amounts consistent with industry standards. There are certain acts that are not insurable.

Data Reported: The district is now a member of Pinnacle Assurance for Workers' Compensation and CSDSIP for Errors & Omissions insurance, which is a coverage under the General Liability policy. Policy limits are consistent with industry standards and deductibles and retention amounts are commensurate with insurance programs at similarly situated school districts.

In addition to the General Liability coverage, policies in place include:

	Limitations	Deductibles
Worker's Compensation	\$1,000,000 per claim	No deductible
Errors & Omissions Insurance (E&O)	\$10,000,000	\$25,000

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 not changed since the last report.

I interpret: "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" 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.

Data Reported: The FY (2017-18) Projected Replacement Value (PRV) of the Plant was \$1,012.23 million. For the reporting period the adopted budget for preventative maintenance,

minor repair and unscheduled maintenance was \$5.85 million or 0.58 percent of the prior year's PRV, which is \$4.27 million deficient of the 1% requirement.

Compliance Statement: The district's performance did not comply with the standard.

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

I interpret: "maintain the plant with due care in a manner that ensures facilities are open for scheduled student/staff contact days" 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, such that 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.

Data Reported: The Facilities Maintenance budget was allocated \$5.85 million in the 2017-18 FY budget. A net total of \$6.50 million was expended for direct labor, indirect labor, employee benefits, supplies, contractors, management and office support for the performance of:

Facilities Maintenance Budget \$5.85 million	
Planned and scheduled (preventive maintenance)	\$2.18 million
Corrective (Unforeseen maintenance)	\$2.96 million
Other (i.e. contracted, indirect and benefit expenses)	\$1.37 million
Net Total	\$6.51 million

Labor Breakdown:

- **17,012** work orders completed during the monitoring period.
 - **4,925** were preventative and minor work orders
 - **8,532** were for unscheduled maintenance work orders
 - **1,158** were for construction/project related work orders
 - **2,397** were other work orders*
 - **92.89%** of all work orders were performed at schools
 - **7.11%** were performed at support facilities.
- * Other work orders are for snow removal, graffiti removal, vandalism, etc.

Accounting for all funds in the **2017-18** FY Facilities Maintenance budget:

2017-18 Budget	
2017-18 Budget Allocation	\$5,852,329
Billings for non-required projects performed by maintenance staff (revenue)	\$508,294
2017-18 Total Maintenance Expenditures	\$(6,506,352)
Funds Over/(Under) Budget in Fund 10	\$(145,729)

The maintenance department expended all funds allocated for FY 2017-18 and performed billable projects in the amount of \$508,294. Funds remaining at the end of FY 2017-18 FY totaled \$(145,729) in the General Fund. The \$(145,729) overage was funded from general fund savings.

The district's Communication Center and maintenance records indicate zero 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.

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

The district now contracts with CostLab to forecast deferred maintenance because CostLab acquired MARS (previous contractor). CostLab has removed asset degradation from their model. Degradation is an assumption that one deferred maintenance item would impact multiple-facility components and accelerate their failure rate. This assumption is no longer included in the CostLab forecasting model.

I interpret: *"The projected cost of total deferred maintenance shall not exceed ten percent (10%) of the projected replacement value"* to mean: 10% of deferred maintenance is the cost of major repair and replacement tasks not performed according to their prescribed lifecycle frequency, resulting from maintenance that was unable to be completed due to the lack of human or financial resources.

Data Reported: The total deferred maintenance estimated by CostLab for the reporting period is \$76.90 million or 7.60% of the FY 2017-2018 PRV of \$1,012.23 million. This represents a increase in deferred maintenance of \$3.97 million from FY 2016-17 to FY 2017-18.

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

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

I interpret: *“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”* to mean: The remaining balance of funds allocated annually for Facilities 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: On June 30, 2018 the accrued balance of the Plant Contingency Fund was \$1.38 million or 0.14% of the PRV. This does not exceed the stipulated maximum of 3.0% of PRV in the Plant Contingency Fund. Facilities Maintenance was \$(145,729) for FY 2017-18. No balance was transferred to the Plant Contingency Fund for the 18/19 FY.

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 not 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, 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.

(A) Student Transport Vehicle Inspections

Data Reported: (A1) 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 100 percent.

CDE Annual Student Transport Vehicle Inspections: July 1, 2016 - June 30, 2017		
Completed on time	147	96%
Completed late	6	4%
Total Inspections	153	100%

Two inspections were late due to the engine replacement at the vendor. One inspection was late due to warranty issues at the dealer. Three inspections were late due to vehicles not added to PM schedule at purchase. Buses that had inspections completed late were not on the road or transporting students during this time.

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

Data Reported: (A2) 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 manufacturer's recommendations.

Completion of Preventative Maintenance: July 1, 2016 - June 30, 2017		
Completed within 6 months after CDE inspection	145	95%
Completed late	7	5%

Total preventative maintenance Performed	152	100%
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The Fleet Department was able to meet the 90% standard of the preventative maintenance inspections by completing 95% of required preventative maintenance inspections within six months of the CDE inspection. 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.

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.

This year all core services have met or exceeded the standard of 99% uptime during instructional time. The majority of service interruptions have been moved to planned service windows on the weekend, or in the evenings when necessary. (Please see the section dealing with Policy Prohibition 5 in this report, as it sheds more light on how this uptime is achieved.) Some service availability is lower than last year. This is in part due to an increase in diligence in our incident documentation processes.

Services Category *	% Availability During Instructional Hours
Student Information System	99.852%
Human Resources Systems	99.954%
Financial Systems	99.954%
Internet Availability*	99.573%
Phone System **	99.16%*
Google GSuite (including Gmail)	99.927%
Average	99.737%

* The category “Internet Availability” tracks network availability (including internal network stability) as measured from the District Internet connection, through the District regional network and to users connecting through wireless access points.

**The old phone system had one full day of District-wide down time during instructional hours that suggested internal instability attributed to the age of the system. This led to the acceleration of the VoIP project that has now been implemented across the District.

Compliance Statement: The district's performance does 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 district policies and procedures that expenditures meeting or exceeding \$5,000 (non-grant funded purchases) or \$3,000 (grant funded purchases/fund 22) 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, provided that at least (3) responses are obtained. A Procurement Deviation Justification Form (PDJ) must be completed and approved for sole source, single source and emergency purchases which typically are service related or specialized products such as proprietary software. For capital construction, bid limits were raised in FY16-17. Projects up to \$15,000 require no bid, \$15,000 - \$50,000 prices may be solicited via email or other written means provided there are at least three (3) proposals obtained.

Data Reported: District 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 employee training. Training occurs at Support Staff/Office Manager meetings, as well as other departmental training. Policies are consistent with the National Institute of Governmental Purchasing (NIGP) code of ethics and procurement standards for governmental purchasing. The district's Purchasing and Finance Departments maintain records regarding district purchases using purchasing cards, requisitions and purchase orders. Purchasing staff review transactions greater than \$5,000 (non-grant funded purchases) or \$3,000 (grant funded purchases/fund 22) for compliance with the policy requirements. The performance standard is that ninety-nine percent (99%) of all transactions meet the purchasing policy requirements. Between July 1, 2017 and June 30, 2018, there were 787 transactions either by Purchase Card, Declining Balance Card or by Purchase Order that met or exceeded the bid thresholds and thus required bid or other competitive process. There were four (4) known policy or process violations equaling .005 or less than one percent (>1%) of transactions reported during this time period.

Compliance Statement: The district’s performance complied 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 “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. Based on a series of earlier audits, the district has continued to devoted significant resources to enhancing controls to our security posture, particularly layers of control in front of core District services.

While the challenge in this space is significant every year, the district continues to have many solutions in play to help address the challenge, including items listed below:

No.	Item	Description	Benchmarks / Benefits
1.	Business Continuity and Data Backup	Primary and Secondary Data-Centers process and store the vast majority of district data and provide stability and resilience in the face of various disruptive events including weather-induced disruption in the regional power grid. A redundant, multi-site backup architecture protects all data housed in district data-centers. During this year, full encryption of all monthly off-site, off-line backups was enforced and data recovery requests within retention guidelines were fulfilled regularly.	At least one data center was up 100% of the instructional time, providing continuous expected service continuity with scheduled service interruptions after hours. 100% success was reported with multi-site backup of 50+ Terabytes of active transactional data each night. Business transactional systems are additionally backed up multi-site at 10 minute intervals 24/7.
2.	Multi-Layer Firewalls	Protects in-district assets from internet-based attacks, internal attackers, and malware. Logs, alerts, and blocks threats both into and out of the district. Towards the end of the year, key district resources received additional customized security filtering.	Hundreds of thousands of attacks per month were stopped by using multi-layer firewall technology, based on monitoring of activity and statistics from these systems.

3.	Virtualization	The majority of all in-district servers are virtualized, resulting in reduced costs in physical hardware, and improving uptime.	Virtual infrastructure supported 550+ virtual machines and key server systems were operational 100% of the time.
4.	Digital Review of Applications and Websites	New educational applications to be used in classrooms (and office applications) are reviewed for security vulnerabilities upon request and as initiated through the purchasing, and web filter review processes.	280+ new educational applications have been approved and whitelisted after a security review, and many more are pending review at this time. Thousands of websites and apps have been blocked (blacklisted) based on their security profile, and/or their noncompliance with regulations.
5.	Configuration Management	Patching vulnerabilities, updating antivirus, and ensuring security configuration and encryption levels allows the district to reduce security vulnerabilities on a regular basis with the tens of thousands of district computers and servers. Disruptive maintenance events are scheduled outside the instructional day based on a Change Management Review process.	Approximately 41,000 managed systems are automatically patched with updated virus protection, via multiple configuration management systems. Key data is encrypted in motion and in off-site off-line storage.
6.	Continuous monitoring, logging, and incident response.	Servers and services are monitored 24 x 7 x 365 by automated systems that alert personnel to events requiring attention. Major servers, services and system are continually logged, and logs are cross-reviewed during analysis and incident response. Significant incidents are rapidly managed and controlled under the management of a Certified Incident Handler.	Log accumulation from 720 devices and 1968 services, and alerts from 1006 devices and 7073 services allows access to large amounts of historical data on our district systems, for process improvement and incident response purposes.
7.	Access Controls	Employee access to district systems is authenticated, accounted and audited based on district-wide directories, major server user account systems, and local permissions.	The district maintains a centralized security account directory (system) with over 43,000 central user accounts after a large stale account cleanup this year in addition to specialized account databases for parents, etc.

8.	System Test Environments	The district continues to use a dedicated hardware-based environment to supplement the existing software testing environments that are extant on the production network.	The District has 60 dedicated testing systems in the software testing environment.
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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: There were no acquisitions or dispositions that met the above thresholds between July 1, 2017 and June 30, 2018.

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: There were no acquisitions or dispositions that met the above thresholds between July 1, 2017 and June 30, 2018.

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 “*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 time period from July 1, 2017 through June 30, 2018.

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 time period from July 1, 2017 through June 30, 2018.

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 time period from July 1, 2017 through June 30, 2018.

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 time period from July 1, 2017 through June 30, 2018.

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 time period from July 1, 2017 through June 30, 2018.

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 relinquish any property ownership during the time period from July 1, 2017 through June 30, 2018.

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: (1-9 above)*

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 16, 2019, for the period July 1, 2017 through June 30, 2018, of the Superintendent concerning Board Policy 2.5 Asset Protection and found the superintendent's interpretations were reasonable and that his conclusions were reasonably supported by data that was relevant, justified and complete.