

Monitoring Report: Executive Limitation

Report Date: March, 2025

Policy E.L. 11 (Asset Protection) - *The Superintendent shall not cause or allow District assets including tangible, intangible, and data assets, to be unprotected, inadequately maintained, inappropriately and/or inequitably used, or unnecessarily risked.*

Accordingly, the Superintendent shall not:

- 1. Permit the organization to insure its property with inadequate valuation and limits and for damage due to an insufficient scope of perils.
 - 1.1. Neglect to obtain insurance coverage against theft, casualty losses, institutional liability, and Directors and Officers liability to at least 80% of replacement value and against liability losses to Board members, staff, or the District itself in an amount that is reasonable for school Districts of similar size and in accordance with law.*
 - 1.2. Permit the Board members, staff, and individuals engaged in activities on behalf of the organization, or the organization itself, to have inadequate liability insurance.**
 - 2. Neglect to take reasonable steps to ensure that the facilities and equipment are not subject to improper wear and tear or insufficient maintenance.*
 - 3. Knowingly or recklessly expose the District, its Board, or staff to a substantial risk of legal liability.*
 - 4. Make purchases inconsistent with the requirements of Board Governance Policy DJ, including failing to request Board approval for purchases or expenditures over \$500,000.*
 - 5. Neglect to use a competitive bidding procedure for all contracted services and for all purchases of supplies, materials, and equipment in the amount of \$50,000 or more.*
 - 6. Neglect to administer measures to assure the protection of intellectual property, information, and files from loss or significant damage.*
 - 7. Neglect to preserve and dispose of all records related to the affairs or business of the District in accordance with state and federal law.*
 - 8. Receive, process, or disburse funds under controls which are insufficient under generally accepted accounting procedures.*
 - 9. Invest in securities that breach legal guidelines.*
 - 10. Acquire, encumber, or dispose of real property in a manner inconsistent with Board Governance Policies DN, DN-R, and DJ.*
 - 11. Permit the District to enter into a contract in which a Board member has an interest unless one of the statutory exceptions applies.*
-

Accordingly, the Superintendent shall not:

- 1. Permit the organization to insure its property with inadequate valuation and limits and for damage due to an insufficient scope of perils.*

Compliance Statement: Compliance will be demonstrated when the organization ensures that its property insurance covers at least 80% of replacement value and includes coverage for a broad scope of perils, in alignment with standard risk management practices for entities of similar size and scope.

Rationale: Adequate insurance coverage protects the organization from financial loss in the event of property damage or destruction. It is essential that coverage is aligned with industry standards to prevent underinsurance, which can lead to financial distress.

Evidence: The district's insurance policy documents, including the valuation clauses, scope of coverage, and proof of compliance with industry standards for property insurance.

1.1. Neglect to obtain insurance coverage against theft, casualty losses, institutional liability, and Directors and Officers liability to at least 80% of replacement value and against liability losses to Board members, staff, or the District itself in an amount that is reasonable for school districts of similar size and in accordance with law.

Compliance Statement: Compliance will be demonstrated when the District obtains comprehensive insurance coverage, including theft, casualty losses, institutional liability, and Directors and Officers liability, meeting at least 80% of replacement value (which is the general standard for property insurance) and ensuring the coverage amount is reasonable for similar-sized districts. (The "80% rule" for commercial property coverage refers to a clause in most commercial property insurance policies called "coinsurance," which requires the policyholder to insure property for at least 80% of its total value to receive full compensation for a claim; if property is insured for less than 80%, owners may face a penalty on claims, meaning the owner will only receive a portion of the payout for a loss.)

Rationale: This ensures protection from financial risks that may arise from unexpected losses or lawsuits. Having appropriate coverage aligns with legal requirements and industry standards.

Evidence: Insurance policy documents that specify the coverage types, limits, and alignment with industry standards, along with legal review to confirm compliance with applicable laws.

1.2. Permit the Board members, staff, and individuals engaged in activities on behalf of the organization, or the organization itself, to have inadequate liability insurance.

Compliance Statement: Compliance will be demonstrated when the organization ensures that Board members, staff, and any individuals acting on behalf of the organization are covered under adequate liability insurance, appropriate to their roles and risks associated with their activities.

Rationale: Ensuring adequate liability insurance for all parties involved in the district’s activities helps mitigate the risk of legal actions and financial liabilities that could affect the district or its members.

Evidence: Insurance certificates, policy documents showing adequate coverage limits, and documentation confirming that coverage extends to Board members, staff, and relevant individuals.

- Board Policy EI: [Insurance Management](#)
- DCSD utilizes a broker for insurance lines and annually evaluates those lines for the best coverage.
- DCSD has [policies](#) in the following areas through the DCSD Risk Department:
 - Property Insurance
 - SEL (School Entity Liability Coverage to include E&O)
 - School Auto
 - [Crime & Excess Coverage](#)
 - Pollution & Remediation Legal Liability Coverage
 - [Cyber Insurance Policy](#) - As a compliant member of the pool, DCSD is provided the maximum cyber coverage allowed by Gallagher of \$1,000,000 for each and every claim and in the aggregate. As opposed to the non compliant members who were offered a maximum of \$250,000 for each and every claim and in the aggregate. Because DCSD brokers insurance lines, this was the maximum amount we were able to secure, due to the volatile cyber market.
 - [Cyber Compliance Listing](#)
 - Employee Benefits Policy
 - Nuclear, Chemical, Biological, Biochemical Acts of Terrorism Policy
 - School Crisis Act Policy
 - Limits of coverage is \$250,000 (annual aggregate)
 - Covers - Reasonable costs (crisis expense (w/in 72 hrs), essential services incurred by the victim who sustained “bodily injury”, mental health services incurred by DCSD for the benefit of the school community.
 - Does not cover obligations that should be covered by work comp, salaries, wages or other employment related expenses, but will cover OT, temporary labor in connection to “school crisis”, things that should be covered under EAP plan.
 - No cost to the District for this coverage, added
 - [Fiduciary Policies](#)
 - [Equipment Breakdown Policy](#)
 - [Foreign Liability Coverage](#)
 - [AD&D Coverage](#)
 - [Excess Workers Compensation Policy](#)

Accordingly, the Superintendent shall not:

2. *Neglect to take reasonable steps to ensure that the facilities and equipment are not subject to improper wear and tear or insufficient maintenance.*

Compliance Statement: Compliance will be demonstrated when the District implements and follows a preventive maintenance program that ensures proper care of facilities and equipment to prevent excessive wear and tear.

Rationale: Routine maintenance is necessary to extend the life of district property, reduce emergency repair costs, and provide a safe environment for students and staff.

Evidence: Maintenance logs, preventive maintenance schedules, and inspection records showing regular and documented efforts to maintain facilities and equipment.

- [2024 Bond Plan](#)
- [Master Capital Plan](#)
- Work Orders
- Fire Department Inspections
- Capital Improvement Plan

Accordingly, the Superintendent shall not:

3. *Knowingly or recklessly expose the District, its Board, or staff to a substantial risk of legal liability.*

Compliance Statement: Compliance will be demonstrated when the District adopts policies and procedures that proactively manage legal risk and ensure that actions taken do not expose the District, Board, or staff to undue legal liability.

Rationale: Managing legal risks is essential to safeguard the district's resources and ensure compliance with applicable laws and regulations. Minimizing exposure to liability protects the district's reputation and financial standing.

Evidence: Risk management policies, legal counsel advice, and documented risk assessments showing measures taken to avoid exposure to substantial legal risks.

- DCSD follows procedures and policies that minimize legal risk and reduce exposure to risk of legal liability. DCSD follows these policies and procedures while actively engaging in practices to minimize legal risk.
- Examples of recent Policy Revisions:
 - [Policy JICJ and JICJ-R: Student Use of District Information Technology - Second Reading \(10-Minute Discussion\)](#)
 - [Proposed Revisions to Policy IKF: Graduation Requirements - First Reading \(10-Minute Discussion\)](#)
 - [Proposed Revisions to Policy JKA: Use of Physical Intervention and Restraint - First Reading \(INFO\) \(15-min presentation | 15-min Q&A\)](#)
 - [Proposed Revisions to Policy LBD-R-1: Douglas County School District Charter School Manual - First Reading \(10-Minute Discussion\)](#)
 - [Proposed Revisions to Policy JCA-JFB: Assignment of Students to Schools, School Choice and Open Enrollment - First Reading \(10-Minute Discussion\)](#)
 - [Policy Revisions-JIH Third Reading \(15-Minute Discussion\)](#)
 - [Proposed Policy Updates for Artificial Intelligence - First Reading \(10-Minute Discussion\)](#)
 - [Proposed Revisions to Policy AC, Nondiscrimination/Equal Opportunity - Second Reading \(20-Minute Discussion\)](#)
 - [Proposed Revisions to Policy GBAA, Sexual Harassment Under Title IX and Other Prohibited Misconduct of a Sexual Nature - Second Reading \(5-Minute Discussion\)](#)
 - [Proposed Revisions to Policy JBA, Nondiscrimination/Non-Harassment of Students - Second Reading \(5-Minute Discussion\)](#)
 - [Proposed Revisions to Policy JBC, Sexual Harassment Under Title IX and Other Prohibited Misconduct of a Sexual Nature - Second Reading \(5-Minute Discussion\)](#)
 - [Proposed Revisions to Policy JIH, Student Interviews, Searches and Arrests - Second Reading \(10-Minute Overview | 20-Minute Q&A\)](#)
 - [Proposed Revisions to Policy GBAA, Sexual Harassment Under Title IX and Other Prohibited Misconduct of a Sexual Nature - First Reading \(5-Minute Discussion\)](#)

- [JCA-JFB: Assignment of Students to Schools, School Choice and Open Enrollment \(Second Reading\) \(10-Minute Discussion\)](#)
- [JKA: Use of Physical Intervention \(Second Reading\)\(10-Minute Discussion\)](#)
- [JKA-R: Use of Physical Intervention \(First Reading\)\(15-Minute Discussion\)](#)
- [Policy Revisions-JIH Third Reading \(15-Minute Discussion\)](#)
- [Proposed Revisions to Policy BG-E, Policy Process Delegation of District Policies - Second Reading \(5 Minutes\)](#)
- [Proposed Revision to Policy BG, Policy Process \(5 Minutes\)](#)

Accordingly, the Superintendent shall not:

4. *Make purchases inconsistent with the requirements of Board Governance Policy DJ, including failing to request Board approval for purchases or expenditures over \$500,000.*

Compliance Statement: Compliance will be demonstrated when the District ensures all purchases and expenditures over \$500,000 are approved in accordance with Board Governance Policy DJ, and proper documentation is maintained.

Rationale: Adhering to Board Governance Policy DJ ensures that large expenditures are scrutinized and approved in a transparent manner, reducing the risk of mismanagement or improper use of funds.

Evidence: Board meeting agenda items showing approval for purchases or expenditures over \$500,000, along with supporting documentation per Board policy. All purchases or expenditures over \$500,000 have been taken to the Board for approval. Jana Schleusner, Chief Financial Officer has confirmed that internal operating procedures require that all proposed expenditures or purchases in an amount exceeding \$500,000 be taken to the Board for approval prior to acquisition.

- [2024-2025 SY Supplier Spend Estimated to Surpass Board of Education Threshold Specified in Policy DJ](#)
- [2024-2025 Supplier Spend Estimated to Surpass Board of Education Threshold Specified in Policy DJ](#)
- [Approval of SY 2024-2025 Supplier Spend Estimated to Surpass Board of Education Threshold Specified in Policy DJ](#)
- [Approval of Construction Agreement for Highlands Ranch High School Synthetic Turf Replacement](#)
- [2024-2025 SY Supplier Spend Estimated to Surpass Board of Education Threshold Specified in Policy DJ](#)

Accordingly, the Superintendent shall not:

5. Neglect to use a competitive bidding procedure for all contracted services and for all purchases of supplies, materials, and equipment in the amount of \$50,000 or more.

Compliance Statement: Compliance will be demonstrated when the District follows a competitive bidding process for all services and purchases exceeding \$50,000 consistent with Colorado Law and District policy, ensuring fairness and cost-effectiveness in procurement.

Rationale: Competitive bidding promotes transparency, fairness, and ensures that the District gets the best value for its expenditures, reducing the risk of favoritism or inefficient spending.

Evidence: Procurement records, including public bids and contracts for purchases and services over \$50,000 support the District's compliance with Colorado Law and District policy. Jana Schleusner, Chief Financial Officer has confirmed that internal operating procedures require that all proposed expenditures or purchases in an amount exceeding \$50,000 is properly bid using public bid process. For construction/operation and maintenance purchasing, that threshold is increased to \$100,000.

- [Rocky Mountain Bidnet](#) - DCSD uses Rocky Mountain Bidnet to post Requests For Proposals (RFP)
 - [Electrical and Lighting Parts and or Installation](#)
 - [Data Center Colocation](#)
 - [Ergonomic Assessment](#)
 - [K-12 Child Care Management System](#)
 - [Foodservice Lines](#)
 - [Investment Advisory Services](#)
 - [RFIDistrictIT Asset Disposition](#)
 - [RFIDistrictEmergency Management Application](#)
 - [Playground Engineered Wood Fiber \(EWF\) Installation and Maintenance](#)
 - [Fencing](#)
 - [Glass Repair and Maintenance](#)
 - [024-24 RFO - Aerial Lift Inspection Services](#)
 - [018-24 RFP DCSD Planning Consultant](#)
 - [Subcontractors](#)
 - [019-24 RFOQual Security Window Film Pre-Qualifications](#)
 - [020-24 RFP - Janitorial Services](#)
 - [Ice Cream Novelties](#)
 - [Playground Inspectors and Installers](#)
 - [Ropes Course Inspectors](#)
 - [Direct Delivery of Commercial and Commodity Foods](#)
 - [Prime Vendor- Nutrition Services](#)
 - [014-24 RFP IT Staff Augmentation](#)
- All suppliers are required to sign a Master Services Agreement, Master Provider Agreement, or Independent Contractor Agreement. These documents contain the District's insurance requirement along with a background check verification.

Accordingly, the Superintendent shall not:

6. *Neglect to administer measures to assure the protection of intellectual property, information, and files from loss or significant damage.*

Compliance Statement: Compliance will be demonstrated when the District implements a comprehensive information security program that ensures the protection of intellectual property, sensitive data, and records from loss, theft, or damage.

Rationale: Protecting intellectual property and sensitive information is crucial to maintaining operational integrity and safeguarding the privacy of stakeholders, including staff and students.

Evidence: Information security policies, incident response plans, audit trails, and security infrastructure (e.g., firewalls, encryption) supporting data protection measures.

- Student Data Privacy - JRCB: [Privacy and Protection of Confidential Student Information](#)
- Procedures for Responding to Breaches - JRCB-R: [Privacy and Protection of Confidential Student Information Regulation](#)
- [Student Data Privacy Webpage](#)
- [Student Data Privacy Addendum](#)
- [Primary Cyber Liability Policy](#)
- [Cyber Compliance Listing](#)

Accordingly, the Superintendent shall not:

7. *Neglect to preserve and dispose of all records related to the affairs or business of the District in accordance with state and federal law.*

Compliance Statement: Compliance will be demonstrated when the District follows state and federal guidelines for record retention and disposal, ensuring records are properly archived and destroyed when appropriate.

Rationale: Proper record management ensures compliance with legal requirements and minimizes the risk of storing unnecessary or outdated information that could be subject to privacy laws.

Evidence: Departments have protocols in place for document retention and disposal. Employee training is provided outlining the legal and regulatory requirements for records management.

- DCSD Registrar training (24-25)
- Student Records Record Management
 - [Graduated Student File](#)
 - [Transferring Student File](#)
 - [Withdrawn Student File](#)
 - [Colorado State Archives](#)
- [DCSD Employee Guide - Employee Records](#)

Accordingly, the Superintendent shall not:

- 8. Receive, process, or disburse funds under controls which are insufficient under generally accepted accounting procedures.*

Compliance Statement: Compliance will be demonstrated when the District maintains and enforces financial controls that comply with Generally Accepted Accounting Principles (GAAP) to ensure the proper handling of funds.

Rationale: Adhering to GAAP ensures that financial operations are transparent, accurate, and protected from fraud or mismanagement.

Evidence: Financial statements, internal audit reports, and financial procedures that demonstrate adherence to GAAP.

- [District Financial Audit](#) (current and prior two years)

Accordingly, the Superintendent shall not:

9. *Invest in securities that breach legal guidelines.*

Compliance Statement: Compliance will be demonstrated when the District adheres to all legal guidelines for investing funds, ensuring investments are made only in legally permissible securities.

Rationale: Compliance with legal investment guidelines ensures that public funds are invested prudently, reducing financial risk and maintaining public trust.

Evidence: Investment policy documents, investment transaction records, and legal review confirming adherence to applicable investment laws.

- DFA: [Cash Management and Investment Policy 03.05.19](#)
- DFA-R: [Cash Management and Investment Regulation 08.08.24](#)
- [Quarterly Financial Statements](#) - Investment Performance
 - [Investment Performance Reports and Statements](#) (Historical)
- Quarterly Financial Statements - Investment Performance given to the BOE
 - [SY 2024-2025 First Quarter Financial Report](#)
 - [SY 2024-2025 Second Quarter Financial Report](#)

Accordingly, the Superintendent shall not:

- 10. Acquire, encumber, or dispose of real property in a manner inconsistent with Board Governance Policies DN, DN-R, and DJ.*

Compliance Statement: Compliance will be demonstrated when all transactions involving real property are conducted in accordance with Board Governance Policies DN, DN-R, and DJ, ensuring proper approval and documentation for any real property actions.

Rationale: Ensuring compliance with Board Governance policies promotes transparency and ensures that decisions regarding real property are made with proper oversight.

Evidence: Board meeting minutes, real property transaction records, and documentation showing compliance with relevant policies.

- Board of Education Real Estate Resolutions and Actions
 - [Approval of Real Estate Contract for 11722 Dransfeldt](#)
 - [Approval of Resolution Declaring 11722 Dransfeldt Road Surplus](#)
 - [Approval of Resolution Regarding Waiver of Bid Requirements Related to Disposition of 11722 Dransfeldt Road](#)
 - [Approval of Purchase and Sale Agreement for 10235 Parkglenn Way \(10-Minute Presentation | 10-Minute Q&A\)](#)
 - [Public Comment on the Purchase and Sale Agreement for 10235 Parkglenn Way \(15 Minutes\)](#)
 - [Purchase and Sale Agreement for 10235 Parkglenn Way \(10-Minute Presentation | 10-Minute Q&A\)](#)
 - [Approval of Exclusive Right-To-Buy Listing Contract with CBRE for 10235 Parkglenn Way](#)

Accordingly, the Superintendent shall not:

- 11. Permit the District to enter into a contract in which a Board member has an interest unless one of the statutory exceptions applies.*

Compliance Statement: Compliance will be demonstrated when the District ensures that contracts involving Board members are reviewed for statutory compliance and Board member interest, with necessary disclosures and approvals.

Rationale: Transparency in contracts involving Board members helps to avoid conflicts of interest and ensures that contracts are awarded fairly and legally.

Evidence: Staff is not aware that the District has entered into any contract in which a Board member has interest.

Compliance: I report compliance with this policy