



OKLAHOMA STATE
DEPARTMENT *of* EDUCATION

December 22, 2022

VIA EMAIL ONLY

Sovereign Community Schools (SCS) Board of Education
Head of Schools Alison Black
12600 N. Kelley Ave.
Oklahoma City, OK 73131

Re: List of Required Reporting and Documentation

Dear Honorable Members of the Sovereign Community School (“SCS”) School Board and SCS Head of School,

At its January 26, 2023, Oklahoma State Board of Education (“State Board”) Regular Board Meeting, the State Board has requested that the SCS leadership present its plans and actions to date to address serious areas of concern highlighted during its last meeting held December 15, 2022.

To support the State Board in its review of SCS’s charter contract performance, the Oklahoma State Department of Education (“the OSDE”) relies on SCS to submit timely and accurate reports and documentation. It has failed to consistently meet this accreditation requirement over the past 3+ years, and it received a deficiency for failing to submit mandated reports in a timely manner on its FY22 Accreditation Compliance Review.

The types of reports and documentation to be submitted to the OSDE are as follows:

- Reporting required by individual OSDE’s departments (Assessment, Financial Reporting, Audit, State Aid, Special Education, Child Nutrition, Accreditation, etc.). Deadlines can be found on the Accreditation page of the OSDE’s website, www.sde.ok.gov/reporting-requirements-calendar
- Documents and reports required by the charter contract including financial reports, board member information, and SCS governance by-laws
- Terms of SCS’s accreditation probation have reporting requirements which include monthly financial documents and bank statements, board meeting documentation provided to board members, and a written financial plan to repay outstanding debt obligations



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- Additional reporting requirements have been made by the OSDE as part of a performance or compliance review such as the April 2022 State Board Quarterly Report

Because Ms. Black is new to SCS and new to being the role of Head of Schools, the OSDE is providing a list of required reporting. Below you will find reports and documents that need to be submitted via email to the OSDE's Legal Services team:

- Brad Clark, General Counsel: Brad.Clark@sde.ok.gov
- Rebecca Budd, Chief of High-Performance Systems and Operations: Rebecca.Budd@sde.ok.gov
- Stormie Honeysuckle, Legal Assistant: Stormie.Honeysuckle@sde.ok.gov

Governing Board Documents

- Board meeting materials for every school board meeting held since November 10, 2022, and all board meetings going forward
 - OSDE should receive materials at the same time they are provided to board members (materials should be sent in multiple emails unless board members receive everything in one email) per SCS's November 2020 Terms of Probation
 - Examples of documents to include
 - Official posted agenda
 - Board minutes
 - All materials given to board members via any method (email, mail, at meeting)
- Most recent version of SCS Bylaws (please include date of last revision)
 - Required as part of board meeting documentation, no later than 10 days of SCS board approval of revision
- List of current School Board members and contact information (email, primary residence address, primary phone number)
 - Due within 10 days of board member status change per contract
- Resignation letters from SCS Board Members submitted since July 1, 2022
 - Due within 10 days of board member status change per contract



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SCS Financial Management

- Update Accreditation reporting online to reflect new assignments for encumbrance clerk, minutes clerk, and activity fund custodian and email names of assigned individuals to Legal Services
 - Due upon change of personnel
- SCS Written financial plan including debt repayment
 - Past Due. Repeatedly requested since March 2022
 - Components requested
 - Organizational chart to address segregation of financial-related duties
 - Projected revenue and expenditures by category
 - Plan to repay outstanding debts including SFS Development and Chickasaw Community Bank
- Monthly and YTD Financial Reports starting with November 2022
 - Monthly and YTD Reports packet created by Jeff Jenkins of Oklahoma Consulting & Accounting Services
 - YTD Encumbrance Report for General Fund, Activity Fund, and Gift Fund including purchase order number, vendor, brief description, amount encumbered, amount remaining
 - YTD Payments Made Report
 - YTD Outstanding Checks/Payment Report
 - YTD Expenditure Analysis Report with OCAS coding
- Financial Account Monthly Statements from July 1, 2022 to present and going forward
 - General Fund bank account
 - Including debit card statement if separate document
 - Activity Fund bank account
 - Gift/Donation account
 - Chickasaw Community Bank line of credit
- IRS Tax Returns (990s) for the following years: FY19, FY20, FY21, and FY22
 - Past Due. Not included in board materials the OSDE received from board meeting at which returns were approved



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School Personnel Records

- Superintendent/Head of Schools Contract for Alison Black
 - Due within 15 days of board approval; board meeting documents
- Resignation letter and severance documentation (if applicable) for Dr. Delso
 - Due within 10 days of board approval; board meeting documents
- Update FY23 SCS's School Personnel Records via Single-Sign On. Please notify Legal Services once completed and re-certified

Accreditation Corrective Action Plan

- OSDE requests that SCS revise the Accreditation Corrective Action Plan (some actions are no longer valid) and submit to Legal Services no later than January 19, 2023, via email

This list of reporting may not include every requirement. It is possible that an individual OSDE department has required reporting/documentation that Legal Services is unaware of.

Should you have questions or want to discuss further, please do not hesitate to contact the OSDE Office of Legal Services, at 2500 North Lincoln Blvd. Suite 500, Oklahoma City, OK 73105; Phone: 405-522-6551; Email: Rebecca Budd, Chief of High-Performance Systems and Operations, Rebecca.Budd@sde.ok.gov

On behalf of the OSDE's Legal Services team,

Rebecca Budd

Chief of High-Performance Systems and Operations
Office of Legal Services, Oklahoma State Department of Education

Cc: Travis Jett, Counsel to the State Board of Education (via email)
Brad Clark, OSDE General Counsel (via email)
Stormie Honeysuckle, Legal Assistant, OSDE Office of Legal Services (via email)



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Ryan Pieper, Executive Director, OSDE Office of Accreditation (via email)
Katherine Black, Ex Director of Financial Reporting, OCAS, and Audit (via email)

Enclosures:

1. Sovereign Community School charter contract
2. April 2022 State Board of Education SCS Quarterly Report
3. September 2022 Notice of Accreditation Letter