

Gap Analysis Report: Board Policy Alignment & Regulatory Compliance (2026–2027)

1. Executive Summary

The strategic purpose of this Gap Analysis is to conduct a formal audit of the *Caregiver Handbook 2026–2027* against the *TLS Board Policies & Bylaws* to ensure institutional stability and regulatory adherence. While the current Handbook effectively communicates the "relational and restorative spirit" of The Leadership School (TLS), it possesses significant regulatory vulnerabilities that undermine its efficacy. This report serves as a governance tool to rectify discrepancies that threaten the school's legal standing and charter viability.

The high-level findings indicate that the Handbook contains critical regulatory misalignments, direct policy conflicts, and the omission of board-mandated requirements. These gaps—ranging from civil rights compliance failures to unauthorized financial penalties—expose the institution to litigation, procedural due-process errors, and financial risk. Addressing these misalignments is a fundamental fiduciary responsibility of the school's leadership. The following sections provide a detailed compliance review and a prioritized roadmap for immediate revision.

2. Critical Legal & Compliance Gaps

Aligning student handbooks with federal and state civil rights mandates is a non-negotiable requirement for institutional protection. Failure to provide specific legal and medical exceptions within school-level policies creates an environment of discriminatory enforcement and violates the school's core mandate to provide equitable access to all student populations.

2.1 Cell Phone Policy Exemptions & Civil Rights Compliance

The Handbook's "Cell Phone Policy (SB 2025)" is in direct conflict with the Board's "Electronic Communications Device Policy" (Section 4, Page 237), which is anchored in **§ 160.405, RSMo** of the Statutory Crosswalk. The Handbook currently enforces a flat prohibition on device use, requiring surrender to the teacher. This blanket ban fails to incorporate the mandatory legal and medical exceptions established by the Board and federal law.

To maintain compliance with the "Equal Educational Opportunity Policy" (Section 4, Page 197), the Handbook must explicitly state exceptions for:

- **IEPs and 504 Plans:** Where devices are required as assistive technology.
- **Individualized Emergency/Health Care Plans:** Necessary for students with chronic medical conditions.
- **Federal Civil Rights Protections:** Mandates under the Americans with Disabilities Act (ADA), the Civil Rights Act of 1964, and the Equal Educational Opportunities Act of 1974 for English language learners.

The "So What?": By failing to state these legal carve-outs, the school risks a "discriminatory enforcement" claim. Such omissions constitute a violation of federal civil rights protections, exposing the school to intensive federal oversight and jeopardizing its charter standing.

2.2 Title IX Coordinator Designation Requirements

A review of the Handbook's staff directory reveals a failure to comply with the transparency mandates of the Board's "Title IX Sexual Harassment Policy" (Section 4, Page 180). **Federal law and Board policy require that the Title IX Coordinator's name or title, office address, email, and phone number be prominently displayed.** The current Handbook provides only general staff emails, which is a specific point of failure in notice requirements. Without this identified point of contact, the institution remains vulnerable to claims of non-compliance with federal harassment reporting standards.

3. Direct Policy Conflicts: Instructional & Reporting Standards

Consistent communication standards with caregivers are essential to maintain academic accountability and public trust. When school-level handbooks deviate from board-approved instructional reporting frequencies, it compromises the school's regulatory integrity.

3.1 Reading Progress Reporting Frequency

A critical numerical conflict exists between the Board's "Reading Assessment Policy" (Section 5, Page 336) and the Handbook's "Reading Success Plans (RSP)" section. **The Board policy mandates parental notification regarding reading progress no less than four times a year. The Handbook currently promises this collaboration only three times per year.**

This discrepancy represents a direct violation of the **Reading Instruction Act Policy (Section 5, Page 335)**. Beyond the regulatory breach, this gap undermines parental rights to timely academic data and delays critical interventions for at-risk readers, potentially impacting the school's annual performance targets.

4. Omissions of Board-Mandated Requirements

The omission of specific Board rules in the Handbook leads to operational inconsistency and complicates the enforcement of school-wide standards. Governance relies on the Handbook being a comprehensive and accurate reflection of Board-mandated operations.

4.1 Chronic Absenteeism and the 'Ten-Absence' Doctor's Note Rule

The Handbook is silent on a critical enforcement mechanism found in the Board's "School Attendance Policy" (Section 4, Page 231). **Board policy requires that for every absence beyond**

ten (10), students **MUST** provide an excuse from a medical professional, health center, or court to be considered "excused."

The "So What?": Omitting this rule hampers the administration's ability to combat chronic absenteeism. Furthermore, per the "Annual Operating Budget Policy" (Section 2, Page 69), mismanaging attendance carries "significant budget impacts." Unaddressed absenteeism is not only an operational hurdle but a direct threat to the school's fiscal health and per-pupil funding stability.

4.2 Board Meeting Public Comment Protocols

The Handbook's "Public Comment Procedure" omits two vital governance rules established in Section 1, Page 58 of the Board Policy:

1. The **two-minute individual speaking limit**.
2. The requirement for **remote speakers to keep cameras on** while addressing the Board.

These omissions invite disruption during public governance sessions and compromise the Board's ability to maintain an orderly and transparent meeting environment as required under the Missouri Sunshine Law (Chapter 610, RSMo).

5. Operational Adjustments & Board Authorizations

For school operations to be legally anchored, daily practices must be explicitly authorized by official Board policy and recorded in the minutes of the governing body.

5.1 Multitiered Grievance Procedure Realignment

There is a procedural discrepancy between the Handbook's 4-level grievance process and the Board's official 3-level "Parents and Student Complaints and Grievances Policy" (Section 4, Page 236). The Handbook adds an unauthorized layer (Level 2: Managing Director of Student Supports / Assistant Principal).

Risk Assessment: If a stakeholder follows the Handbook's unauthorized 4-level process and subsequently appeals to the Board, any final decision could be vacated in a court of law due to a **procedural due-process error**. The institution must either revert to the authorized 3-level chain or obtain a formal Board amendment to Section 4, Page 236.

5.2 Authorization of Late Pick-Up Fee Schedules

The Handbook lists a \$5 per 15-minute fine for late pick-ups. Under the "Student Fees Policy" (Section 4, Page 242), all fee schedules must be approved by the Board annually. Furthermore, the "Annual Operating Budget Policy" (Section 1.4, Page 69) requires Board adoption of all expenditures and revenue protocols "before the expenditure of any funds." Without a formal minute-entry specifically authorizing this fee, it is currently legally unenforceable and constitutes a fiscal management risk.

6. Actionable Alignment Checklist

The following table serves as a prioritized roadmap for the immediate revision of the Handbook to ensure total alignment with the *TLS Board Policies & Bylaws*.

Handbook Section	Board Policy Reference	Gap/Conflict Identified	Recommended Revision (Specific Text to Add/Modify)
Cell Phone Policy (SB 2025)	Electronic Communications Device Policy (§ 160.405, RSMo)	Missing mandatory legal/medical exemptions for civil rights compliance.	Modify text: "Exceptions to the device surrender rule will be made for students with documented IEPs, 504 plans, or medical emergency plans, and for English Language Learners as required by § 160.405, RSMo."
Administrative Staff Directory	Title IX Sexual Harassment Policy (S4, P180)	Missing required Coordinator contact details (Address, Phone).	Insert full contact block: "Title IX Coordinator: [Name/Title], [Office Address], [Phone Number], [Email Address]." Ensure this is prominently displayed.
Reading Success Plans (RSTitP)	Reading Assessment Policy (S5, P336)	Reporting frequency conflict (3 vs. 4 times per year).	Update text: Change "three times per year" to "no less than four times a year" to comply with the Reading Instruction Act.
Attendance & Absences	School Attendance Policy (S4, P231)	Omission of the 'ten-absence' medical documentation requirement.	Add text: "Per Board policy, for every absence beyond ten (10), students MUST provide an excuse from a medical professional, health center, or court to be considered excused."
Public Comment Procedure	Public Comments During Board Meetings (S1, P58)	Missing speaker limits and remote participation rules.	Add text: "Speakers are limited to two minutes. Remote speakers must keep cameras on while addressing the Board."
Grievance Process	Parents and Student Complaints Policy (S4, P236)	Unauthorized 'Level 2' layer creates due-process risk.	Action: Revert to the 3-level process (Teacher -> Principal -> Board) or obtain a formal Board amendment to Section 4, Page 236.

Late Pick-Up Fees	Student Fees Policy (S4, P242); Annual Operating Budget (S1.4, P69)	Fee not authorized by minute-entry; currently unenforceable.	Action: Present the \$5 per 15-minute fee schedule for formal Board approval and record the authorization in the official meeting minutes.
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