Introduction
In 2012, Fulton County Schools (FCS) became Georgia’s largest charter system. In the development of its charter system framework, FCS included a process by which schools would develop and submit requests for waivers from district and/or state law or policy. These proposals must be publicly presented to the school community, receive a 2/3 vote of the School Governance Council (Council), and be approved by the Superintendent in order to be implemented. These proposals are known as Requests for Flexibility or RFFs.

The objectives of the RFF proposal process are as follows:

- Ensure the proposed intervention is aligned to the school’s needs.
- Ensure school community support for the proposal:
  - Proposal demonstrates a high likelihood of increased student achievement.
  - School community understands the proposal and its rationale.
  - School community has an opportunity for input on the proposal.
- Ensure district support for the proposal:
  - Proposal demonstrates a high likelihood of increased student achievement.
  - Proposal is legally acceptable within charter system laws and regulations.
  - Implications of the proposal are explored by the school and are reviewed by the district.
  - District departments understand which laws, policies, and/or processes will need to change in order to implement the proposal.

The Five Phases of the RFF Process
Currently, Councils can submit RFFs once per year. Councils can expect a four to six month development and review process, which includes five distinct phases:
Phase 1: Explore a Concept
As the Council reviews/finalizes its strategic plan, the Council should review all of the proposed strategic initiatives and discuss the purpose, goals, anticipated cost, and high-level project plan of each initiative. The Council should use this information to identify initiatives or specific parts of strategic initiatives that may require a waiver of district and/or state law or policy. If the Council is unsure about the policy or legal implications of its initiatives, a Council representative must contact the Governance & Flexibility facilitator assigned to support the school. The facilitator will work with the FCS policy and legal teams to determine the appropriate next steps for the Council.

1) Can be implemented without a waiver in partnership with relevant FCS department(s).
→ The principal contacts the appropriate FCS department(s) to determine the school’s next steps.

2) Laws, policies, and/or practices likely stand in the way of the implementation of the strategic initiative.
→ The Council moves to Phase 2 of the RFF process, which is the submission of an RFF automated form.

Fulton County Schools strongly recommends a thorough review of all strategic initiatives in order to determine which may require waivers. Councils that miss the deadlines outlined in this document will not be able to submit RFF proposals until the next fiscal year.

Below are a few resources for Phase 1:

<table>
<thead>
<tr>
<th>Phase 1 Resource</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appendix A: List of Available Flexibilities</td>
<td>This document lists common ideas that schools can pursue without a waiver in partnership with relevant FCS department staff. This list is not exhaustive.</td>
</tr>
<tr>
<td>School Autonomy Guidebook</td>
<td>This document describes FCS’ approach to school autonomy. It outlines the six guiding principles that FCS uses to determine what schools can and cannot waive. Download this document from the charter system website.</td>
</tr>
</tbody>
</table>
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Phase 2: Submit an RFF Automated Form
When it becomes clear that an initiative likely requires a waiver of district and/or state law or policy, the Council must prepare and submit an RFF automated form. The RFF automated form summarizes an RFF concept. Submission of this form allows district leaders to consider the idea in light of FCS’ framework for school autonomy and to determine which FCS content experts need to provide feedback on the concept.1

The Council has the opportunity to submit an RFF automated form 3 different times this year. The deadlines for the 3 submissions are October 4, 2019, December 13, 2019, or February 7, 2020. The Council may submit any number of RFF automated forms. The Council may submit an RFF by any one of the three deadlines outlined in the 2019-2020 calendar found HERE.

To submit the RFF interest form, take the following steps:
1) Go to the link for the RFF automated form on the charter system website.
2) Complete the form and solicit Council feedback on it. Although Council members are not required to vote on the RFF automated form, they should have the opportunity to discuss and provide feedback on the proposed concept and the form.
3) The council must submit the completed RFF automated form by 4:00 pm before one of the three deadlines outlined above. The Council chair and facilitator must be copied on the submission.

After the submission and review of the RFF automated form, the designated facilitator will provide an update to the Council within one month of the applicable submission deadline.

Below are a few resources for Phase 2:

<table>
<thead>
<tr>
<th>Phase 2 Resource</th>
<th>Purpose</th>
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</thead>
<tbody>
<tr>
<td>RFF Automated Form (Required)</td>
<td>This one-page document summarizes an RFF concept (one that requires a waiver of district and/or state law or policy). Fulton County Schools’ leaders and staff use this document to understand the proposed concept and provide initial feedback to Councils. Download this document from the charter system website.</td>
</tr>
<tr>
<td>School Autonomy Guidebook</td>
<td>This document describes FCS’ approach to school autonomy. It outlines the six guiding principles that FCS uses to determine what schools can and cannot do. Download this document from the charter system website.</td>
</tr>
</tbody>
</table>

1 In some cases, the Council may be asked to modify the concept because it would affect a key district strategy, compliance, or district-wide economies of scale.
Phase 3: Revise your RFF Proposal

FCS and area superintendents will provide feedback and other guidance, in which the principal, in conjunction with the Council, may need to revise the RFF proposal. School Governance Councils are strongly encouraged to convene a committee to commit to overseeing the development of the RFF proposal and to designate one Council member as the RFF point person who can keep the Council updated on the status of the RFF proposal.

The RFF proposal includes the following elements:

- Demonstrated alignment with the strategic plan;
- Any revisions based on feedback or guidance from FCS leadership;
- A thorough concept summary;
- A description of the waiver(s) requested;
- A description of the anticipated impact on students and families, personnel, departments, processes, and schools; and
- A budget.

During the RFF revision process, the Council can expect to discuss and review the proposal several times over multiple full Council and Committee meetings. Whenever the Council plans to discuss a document during a meeting, the Council chair or parliamentarian should make every effort to send the document one week in advance of the meeting, so Council members can come to the meeting with questions and/or comments.

After the Council has reviewed, discussed, and revised the document, the Council must vote to post the document for a mandatory 30-day Public Comment period. This action requires a majority vote. In other words, once a quorum is established, the majority of voting members present at that meeting must vote to make the RFF proposal public. Please refer to the 2019-2020 calendar to review the various deadlines to post your RFF for public comment.

Below are a few resources for Phase 3:

<table>
<thead>
<tr>
<th>Phase 3 Resource</th>
<th>Purpose</th>
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<tbody>
<tr>
<td>Previous RFF Proposals</td>
<td>Review previously submitted RFF proposals to get a sense of what information must be included in the RFF proposal, approximately how long the RFF proposal should be, and how to build a case for your request. Download all RFFs from the charter system website.</td>
</tr>
<tr>
<td>RFF Proposal (Required)</td>
<td>In this document, the Council explains the proposed concept in detail. The Council will share the RFF proposal with its school community during the 30-day Public Comment period and submit a final version of it to FCS for review. Download it from the charter system website.</td>
</tr>
</tbody>
</table>
Phase 4: Gather and Respond to Public Comment
The Council must gather input from the school community about the RFF proposal through a mandatory 30-day Public Comment period. (Note that comments must be accepted for 30 calendar days, not business days.) The Outreach & Communications Committee is responsible for carrying out the following actions during the Public Comment period on behalf of the Council:

1) Posting the RFF proposal and the school strategic plan on the front of the school webpage and the Council webpage;
2) Placing a comment box in a visible location at the school to collect input from stakeholders;
3) Placing the RFF proposal and the strategic plan in the main office; and
4) Accepting public comments regarding the RFF proposal during at least one Council meeting within the 30-day Public Comment period.

The Public Comment period officially begins once the Council completes 1, 2 and 3 above. Please refer to the 2019-2020 calendar to review the various deadlines to post your RFF for public comment.

At the conclusion of the 30-day Public Comment period, the Outreach & Communications Committee must collect and synthesize the feedback collected during the Council meeting(s), from the comment box, and through email. This should take place during a Committee meeting. Soon after that Committee meeting, members of the Outreach & Communications Committee should present their findings at a Council meeting. At its discretion, the Council may decide to modify the RFF proposal to incorporate the feedback gathered during the Public Comment period. The Council, or its designee, then completes questions one through four of the RFF post public comment form.

Below are a few resources for Phase 4:

<table>
<thead>
<tr>
<th>Phase 4 Resource</th>
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</thead>
<tbody>
<tr>
<td>Appendix B: Public Comment</td>
<td>Use this checklist to prepare for and manage the 30-day Public Comment period.</td>
</tr>
<tr>
<td>Checklist</td>
<td></td>
</tr>
<tr>
<td>Appendix C: Public Comment</td>
<td>This document is a sample script that can be used at the meeting during which the Council plans to accept public comments on the RFF proposal. Adjust this sample language as appropriate for your specific school.</td>
</tr>
<tr>
<td>Script</td>
<td></td>
</tr>
<tr>
<td>Appendix D: Public Comment</td>
<td>The Council can distribute this handout before and/or during Council meetings where the Council will accept public comments. We encourage you to adjust this document as appropriate for your specific school.</td>
</tr>
<tr>
<td>Handout</td>
<td></td>
</tr>
<tr>
<td>RFF Post Public Comment Form</td>
<td>In this document, Councils record the activities that they carried out during the 30-day Public Comment period. Download this document from the charter system website.</td>
</tr>
<tr>
<td>(Required)</td>
<td></td>
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</tbody>
</table>
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<table>
<thead>
<tr>
<th>Phase 4 Resource</th>
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</thead>
<tbody>
<tr>
<td>Sample Public Comment FAQs</td>
<td>If the Council wishes to address particular concerns or questions that were raised/they anticipate being raised during the Public Comment period, the Council should consider creating an FAQ document for the school community. Shakerag Elementary School and Centennial High School created RFF FAQ documents for their school communities during the 2013-14 RFF process. These documents can be downloaded from the charter system website.</td>
</tr>
<tr>
<td>Sample Public Comment Announcements/Information</td>
<td>It is important to get the word out regarding the public comment period and how citizens can provide feedback to the Council. Some examples from previous years can be found on the charter system website.</td>
</tr>
</tbody>
</table>
Phase 5: Final Submission of an RFF

Once the Council completes the 30 day public comment window, they will now determine whether to submit the revised final RFF for FCS approval. It is best practice for the Council chair to send the RFF to all members of the Council in advance of the Council meeting during which the vote regarding the final submission will occur. During the Council meeting, the Council should discuss any proposed changes and then cast a vote on the RFF. Requests for Flexibility must be approved by a 2/3 affirmative vote of all voting members then in office no later than one of the 3 deadlines: December 13, 2019, March 11, 2020, or April 20, 2020.

The following must occur before the Council submits the RFF to FCS:

- Complete the questions of the RFF post public comment form found in the automated form.
- Secure the signature of the Council chair.

The Council must submit the RFF automated form by one of the 3 dates listed above. The final submission includes the RFF proposal, the RFF post public comment form. Late RFF submissions will not be accepted.

The RFF submission must receive the recommendation of the school’s Area Superintendent before being submitted to the Superintendent for final review and decision. The Council chair and principal will receive a verbal and written response from FCS based on the timeline for submission of the 3 dates.

Below is a resource for Phase 5:

<table>
<thead>
<tr>
<th>Phase 5 Resource</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>RFF Post Public Comment Form</td>
<td>In addition to summarizing how the Council managed the 30-day Public Comment period, this document also is where Councils record the final Council vote on the RFF. This form is embedded in the automated RFF form and will unlock once the SGC has received approval for public comment from FCS leadership.</td>
</tr>
</tbody>
</table>
Appendices

A. List of Available Flexibilities
B. Public Comment Checklist
C. Public Comment Script
D. Public Comment Handout for School Community
A. List of Available Flexibilities

There are many practices and strategies that schools can pursue without a waiver by collaborating with FCS central office staff. We’ve listed a few of these flexibilities below:

- Creating new courses\(^2\)
- Determining staffing priorities (e.g., TAG)
- Selecting custodial or other building support services
- Bringing in non-certified volunteers to augment the school’s instructional staff
- Implementing the Schoolwide Enrichment Model
- Offering foreign language instruction in elementary schools\(^3\)
- Converting funds within a school’s cost center budget

\(^2\) New course additions must be submitted to and approved by the State Board of Education. These proposals are due by June 1 each year.

\(^3\) Depending on the grade levels and course, this might require a new course proposal. Consult your Facilitator or the district’s Learning and Teaching staff.
B. Public Comment Checklist

During the 30-day Public Comment period, the Council must share the RFF proposal with the school community and gather feedback on the proposal by carrying out the following actions:

☐ The Council votes to post the RFF proposal for the mandatory 30-day Public Comment period (please refer to the 2019-2020 RFF calendar for dates). This action requires a majority vote.

  The Council initiates the 30-day Public Comment period by completing the following:
  1) Posting the RFF proposal and the strategic plan overview on the front of the school webpage and the Council webpage;
  2) Placing a comment box in a visible location at the school to collect input from stakeholders; and
  3) Placing the RFF proposal and the strategic plan overview in the main office.

☐ Within the 30-day Public Comment period, the Council must accept public comments on the proposal during at least one Council meeting. Accepting public comments during the Council meeting is an opportunity to gain input from the public, not for immediate responses by the Council.

☐ The Council may do the following:
  ▪ Post the RFF proposal on school social media sites such as Facebook and Twitter.
  ▪ Encourage members of the school community to email their feedback to all Council members.
  ▪ Send informational letters or flyers about the RFF proposal and the RFF process to the school community.

☐ As appropriate, the Council incorporates comments from the 30-day Public Comment period in the RFF proposal.
  ▪ Council completes questions one through four of the RFF post public comment form.

☐ During a Council meeting, the Council votes to decide whether to submit the RFF to FCS for consideration. The RFF must be approved by a 2/3 affirmative vote of all voting members then in office.
  ▪ The Council, or its designee, completes questions five and six of the RFF post public comment (embedded in the automated form) before submitting the RFF.
  ▪ The final updated RFF automated proposal form must be submitted by the principal or his/her designee no later than the dates outline above.

Note: The Outreach & Communications Committee is responsible for managing the Public Comment period.
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C. Public Comment Script
The following is a sample script for the Council to use at the meeting during which public comments on the RFF proposal will be accepted. Feel free to adjust this script for your specific school.

The purpose of this part of the meeting is to collect input from our school community on the Request for Flexibility proposal that our school plans to submit to Fulton County Schools. Through the Request for Flexibility process, our school can request a waiver from district and/or state law or policy in order to implement a school-based solution to meet our students’ needs.

<Insert School Name> would like to <Insert Brief Concept Description>. We hope to address <Describe the Need> by implementing this concept. Our school is requesting a waiver from <Insert Applicable FCS and/or State Law or Policy>. A copy of the RFF proposal and supporting documentation, which includes an in-depth description of the proposed concept, is available at <Insert URL> and at <Location of Print Copies>.

Please note the following procedures for this meeting:

✓ Individuals who wish to address the Council should place their names on the sign-up sheet.
✓ The window for public comments will end after <Insert Time Window>, or when all speakers who signed up to speak have been heard, whichever occurs first.
✓ Speakers will be heard in the order in which they signed up.
✓ Speakers should begin by stating their name and connection or interest in the school.
✓ Each speaker will have <Insert Time Window> minutes to speak.
✓ We will <Insert Signal> when your time is up. (Possible signals include a raised hand, a sign, colored cards, etc. Consider providing speakers with a one-minute warning.)
✓ This period is designed to gain input from the public, not for immediate responses by the Council.

**Accept Public Comments**

We would like to thank all of the speakers for taking time to be here tonight.

Please remember the period for public comments is designed to gain input from the public, not for immediate responses by the Council. While the Council cannot assure each speaker of a specific or individualized response, the Council will consider the comments and any materials provided by the speakers. Where appropriate, the Council may revise the RFF proposal to reflect input from the school community before submitting the RFF to the school’s Area Superintendent for review.
If there are questions or information that you have for the Council, you may contact one or more of the Council members after this meeting. In addition, you can find our contact information as well as meeting dates and agendas on the Council webpage of the <Insert School Name> website.
D. Public Comment Handout for School Community
The following is a handout that the Council can distribute before and/or during Council meetings with a public comment period. Feel free to adjust this document for your specific school.

Thank you for joining us. The Council welcomes and encourages members of the school community to attend its meetings to remain abreast of the Council’s work and to provide input on the Council’s decisions. The Council reserves time to allow members of the school community to provide public comments, subject to the following procedures:

- Individuals who wish to speak should place their names on the sign-up sheet at the meeting site.
- The window for public comments will end after <Insert Time Window>, or when all speakers who signed up to speak have been heard, whichever occurs first.
- Speakers will be heard in the order in which they signed up.
- Speakers should begin by stating their name and connection or interest in the school.
- Each speaker will have <Insert Time Window> minutes to speak.
- We will <Insert Signal> when your time is up. (Possible signals include a raised hand, a sign, colored cards, etc. Consider providing speakers with a one-minute warning.)
- Speakers may not address confidential student or personnel matters.
- Speakers will not be denied the opportunity to speak based on their viewpoint.
- Speakers should be courteous and professional. The Council chair may terminate comments that are profane, vulgar, or defamatory.
- Speakers are encouraged to provide the Council with a written copy of their comments and other appropriate supporting documentation.

Please remember that the public comment period is designed to gain input from the public, not for immediate responses by the Council.