DIVISION OF ELEMENTARY & SECONDARY EDUCATION

Charter Amendment Request From

The Charter Amendment Request Form and all required documentation must be received via email (ade.charterschools@arkansas.gov) at the Arkansas Department of Education at least 35 days prior to the Charter Authorizing Panel meeting.

Charter Name:	West Memphis High School
LEA Number:	(1803000)
Superintendent or Director:	Jonathan Collins
Email:	collins@wmsd.net
Phone:	(870) 735-1915

All open-enrollment amendment requests must include evidence that the request was contemporaneously sent by the applicant to the superintendent of the school district where the charter is located.

Type of Amendment(s) Requested

☐ **Add a New Campus** (Must also submit the map of current location, map of proposed location, Facilities Utilization Agreement and desegregation analysis)

Address: _____

School District: _____

☐ **Relocate Existing Campus** (Must also submit the map of current location, map of proposed location, Facilities Utilization Agreement and desegregation analysis)

Campus Name: _____

Current Address: _____

Proposed Address: _____

School District: _____

☐ **Increase Enrollment Cap**

Current Cap: _____

Proposed Cap: _____

☐ **Change Grade Levels Served**

Current Grade Levels Served: _____

Proposed Grade Levels Served: _____

☐ **Name Change**

New Name of Charter: _____

X **Add a Digital Learning Program**

Schools	Grades/Courses	Interaction	Delivery	Platforms
West Memphis High School	10-12/ All	☐ Asynchronous ☐ **Synchronous** Asynchronous & Synchronous	X Virtual (online) ☐ Blended (hybrid)	X LMS X CMS
		☐ Asynchronous ☐ Synchronous ☐ Asynchronous & Synchronous	☐ Virtual (online) ☐ Blended (hybrid)	☐ LMS ☐ CMS
		☐ Asynchronous ☐ Synchronous ☐ Asynchronous & Synchronous	☐ Virtual (online) ☐ Blended (hybrid)	☐ LMS ☐ CMS

Waiver Topic	Standard for Accreditation	Division Rules	Arkansas Statutes	Indicate if the school is applying for the waiver and explain how the waiver will be utilized.
Attendance			6-18-213(a)(2)	We do not plan to use this waiver. Our daily record of student attendance will be maintained in the same manner in both virtual and onsite models.
Class Size	1-A.5	DESE Rules Governing Class Size and Teaching Load	6-17-812 (a)(2)	We do not request this waiver.
Teaching Load Teacher of Record provides virtual instruction to only students who are remote. Please note that 100% virtual (online) or remote (distance) classes are considered large group instruction courses as per DESE Rules for Distance and Digital Learning and teaching load would not apply as per DESE Rules Governing Class Size and Teaching Load.	1-A.5	DESE Rules Governing Class Size and Teaching Load	6-17-812	We do not plan to use this waiver. Teaching loads for grade levels 9-12 who teach both virtual and onsite classes can have 15 additional students per digital period, not to exceed 150 students total. Although this would be considered the maximum number of students for a teaching load, current projections indicate numbers much lower than the maximum.
Six Hour Instructional Day Waiver applies to virtual/remote students only	1-A.4.2		6-16-102; 6-10-126	Although learning synchronously, virtual students may have more control over the pace of coursework than those engaged in onsite instruction. This may mean that the 6-hour school day may not need to be live to master the course standards. The district will not be required to provide a school day that averages six (6) hours per day or thirty (30) hours per week for 100% virtual learners due to the fact that technology-based approaches are the primary instructional delivery and students will be doing some independent work outside of the live instruction.
Clock Hours	1-A.2			Students in a virtual setting where learning is synchronous will have some flexibility in doing their coursework at their own pace when not engaged in active live instruction. This may mean that 120 hours of seat time or clock

				hours per credit may not be needed to master the course standards.
Recess Waiver applies to virtual/remote students only	1-A.4.3	DESE Rules Governing Nutrition and Physical Activity Standards and Body Mass Index, Section 7.11	6-16-102(a)(5)	Does not apply to 10-12

Digital Model

Please complete the following application with complete responses describing the school digital programming.

Interaction / Delivery

What are the ways teachers and students will interact with digital content? (Synchronous or Asynchronous) Please describe instructional expectations and participation for students.	The goal of the virtual learning program for the West Memphis School District (WMSD) is to provide a flexible and supportive learning option for families and students who need and desire an equitable alternative to the onsite school experience. The curriculum will offer students a robust digital learning option with the benefit of synchronous "live" instruction coupled with aligned asynchronous courses. This allows for students and teachers to develop relationships, differentiate instruction and provide some level of flexibility with learning. WMSD teachers will provide instruction online through Google Classroom (10-12). Students enrolled in the Alternative Learning Environment (ALE) will be served through the Responsive Ed curriculum. The Responsive Ed curriculum will be used with both onsite

	and virtual students. ALE teachers work collaboratively with general ed teachers. Students will be expected to follow a schedule with synchronous virtual meeting attendance. Students will also be assigned asynchronous learning tasks to be completed when not meeting in large or small groups. CTE courses are offered in various formats which include a conversion partnership with ASU-Midsouth on their campus, onsite at The Academies of West Memphis and virtually through Google classroom. Virtual students will receive the same curriculum instruction as the students receive onsite. Lessons will be created collaboratively, when applicable, with teachers who are teaching onsite students. Teachers will have the flexibility to add to their lessons in order to meet the needs of individual students. All units of instruction, whether purchased or locally developed, will be aligned with Arkansas' Academic Standards. Students interact with teachers to complete learning tasks, both teacher directed and independently. Teachers and students monitor task completion and mastery of the same standards as students in onsite classrooms. Teachers provide feedback through LMS/CMS and live stream sessions.
What delivery approach will the school utilize to meet the needs of both teachers and students? (i.e., virtual (online) / remote (distance) or blended (hybrid)? Please explain.	The district will utilize a virtual/online instructional model. Students will receive direct instruction, complete learning tasks, and receive intervention virtually. Virtual School teachers will provide lessons live with Google Meets as well as a variety of interactive technology tools. Google Classroom is the primary CMS systems employed by the district for frequent communication and delivery of lessons. Lincoln Learning and the LMS Buzz platform will also be used to supplement instruction. Students will come on campus for state testing, health screening, some types of instructional support and intervention, etc. Students in grades 10-12 will be required to come on campus to attend AAA competitive activity classes such as but not limited to art, choir, band, baseball, basketball, and soccer. In addition, students in grades

	10-12 who elect to participate in AP courses will be required to attend those onsite.
Will teachers be dedicated to primarily remote instruction or serving in a dual role, teaching both remote and in-person learners. *If teachers will serve in a dual role, describe whether it will be simultaneously, meaning remote and in-person at the same time with course/schedule specific considerations.	Teachers in 10-12 may teach some classes for virtual students and others for onsite students. Virtual and onsite students will be scheduled in the same class period.
Describe the expectation for teacher instruction, interaction, and frequency with digital learning students.	Teachers will interact live with students daily following a consistent schedule during regular school hours. This schedule will be developed and provided to students/parents before school begins and will also be posted on the district and school websites. Instruction will be provided synchronously. Each student is assigned a West Memphis School District Teacher. The teacher's role is to support the student with their online education in the virtual learning program. This includes monitoring student progress, attendance, and engagement and making recommendations for student intervention when necessary.
If utilizing waivers for **class size**, what supports will the school put in place to support the teacher and students? How will the charter monitor and determine if the supports are adequate for teachers who exceed class size in digital learning settings.	NA
If utilizing waivers for **teaching load**, what supports will the school put in place to support the teacher and students? How will the school monitor and determine if the supports are adequate for teachers who exceed teaching loads in digital learning settings.	We do not plan to use this waiver. We will not plan to exceed the maximum teaching load permitted.
Technology / Platforms	
Identify the learning management system/content management system that will the school will use? (Canvas, Buzz, Google Classroom, etc.)	Google Classroom with district curriculum for students in grade 10-12.

Describe the digital content that will be available to students, including any digital curriculum and supports that are available to teachers. If the school is using a content management system (CMS), please specify grades levels and subjects that the CMS will address.	In all grades (10-12), the digital content is developed, almost exclusively, by district staff (teachers and dedicated curriculum staff). The digital content is managed by Google Classroom (10-12) and is designed to effectively target state academic standards. Virtual students will receive instruction that is almost identical to what onsite students are receiving. Additional pedagogical supports that will be available to students include: -science resources supplemented by an Elbow to Elbow (E2E) consultant -Discovery Education resources provided for all elementary schools -ResponsiveED will be utilized for ALE students -CTE courses are offered in various formats which include a conversion partnership with ASU-Midsouth on their campus, onsite at The Academies of West Memphis and virtually through Google classroom.
What video communication software is required for any digital learning student? Please describe the video communication software the teacher will use to facilitate live conferences between two or more participants.	Teachers will use Zoom video communication software or Google Meet to communicate with students. Software is included on the teacher and student devices provided by the district. Students in 10-12 are provided Chromebooks. All student and teacher devices also have built in webcams for video communication.
Describe the technology access (device and connectivity) that will be provided to each digital learning student to ensure each student receives a free public education.	The district provides a chromebook to all students in grades 10-12. Teachers are also provided a district owned device for instructional use. Students with limited or no connectivity will be provided a district-owned hotspot or local internet access. Drive-up WiFi is also available at locations within the district (listed on the website) and the community library offers free WiFi for students in the event that students have short-term connectivity issues. Students experiencing temporary internet outages or the inability to connect are instructed to contact the school to establish a plan for missed days of instruction. All district devices are monitored using Go Guardian and filters are in place to meet the provisions outlined in the Children's Information Protection Act.

	The West Memphis Technology Department is available for support to students and families during school hours via phone or email. Parents and students will receive a troubleshooting guide for the most common technology issues in the event a need arises after hours. The technology staff is also able to access district-owned student devices remotely to troubleshoot during regular work hours.
Student Supports	
Describe the manner and frequency the school will use to monitor the wellness and safety (food security, physical, mental health, etc.) of students in a digital learning setting. (This may be in-person, video communication, etc.). Identify supports available within the school to assist students.	It is important for our staff to see and interact with our virtual students in real-time. As a result, 10-12 virtual students are required to be in all core classes via live virtual sessions over the course of each day, with their cameras on. This not only enhances student learning but it also allows staff working with students to note if there is anything amiss with the student or their home environment. It also helps to build relationships between students and teachers as well as students and their peers. Additionally, counseling services that are currently available to students who participate in onsite learning will also be available to virtual students. (example; small group and individual student counseling services; Student Success Plan support, Comprehensive Counseling Plan, grades 10-12 Course Selection, etc) At various times of the year virtual students will be asked to report to a location within the district for state mandated health screenings. Vaccination requirements will be monitored for virtual students as well. Virtual families have the option to participate in our weekly Meal Pick-Up Program on Monday of each week. The meal pick-up is at no cost for students. Parents may pick up five breakfasts and five lunches per child on Monday of each week, at sites throughout the district. Frequent district communication regarding our Meal Pick-up Program is shared with our virtual families. www.wmsd.net Teachers, counselors, and administrators assigned to our 10-12 Virtual school are trained to notice when something may be amiss with a student's physical and/or mental well-being. Should it be determined that a family is in need, quick action will be taken to ensure the

	necessary resources are available to them. Virtual teachers will receive additional training during Back-to-School in-service.
Describe the manner and frequency the school will use to monitor the academic and student engagement in a digital learning setting. Describe the additional supports available for students struggling with engagement.	Weekly progress monitoring will take place utilizing reporting from the learning/content management systems and attendance records of the virtual classroom teachers. Virtual teachers will provide intervention for students not showing progress based on either letter grade or NWEA scores. If interventions are not successful, the student will be referred to the campus intervention team. Interventions may include but are not limited to weekly check-in meetings with the mentor teacher, parent and student meetings with campus administration, or a transition to face-to-face instruction. The Academies of West Memphis also offers tutoring onsite before and after school, as well as Saturday mornings and Sunday afternoons for any student in need of services. Our program contracts also state that a campus administrative team has the discretion to require that a transition back to onsite learning occurs for the best interest of the student related to academic progress, engagement and/or attendance.
Describe the Academic Response to Intervention plan for digital learning students, including additional supports and personnel.	All students are given universal screeners and monitored based on performance to determine if adequate progress is being met toward grade level standards. Students are provided supplemental instruction if they perform below grade level through a tiered structure of support. A blend of synchronous and asynchronous learning opportunities are offered. The Academies of West Memphis also offers tutoring before and after school, as well as Saturday mornings and Sunday afternoons for any student in need of services. If a student is not making the required daily academic progress or is not engaging consistently, the student's teacher will intervene. The interventions may include, but are not limited to: Teacher activity: ○ A phone call to student and parents ○ Create and implement Student Individualized Intervention Plan ○ Academic coaching Student activity:

	○ Specific completion of daily and/or weekly goals determined by the teacher and accomplished by the student. ○ Mandatory in-person or virtual meetings with the teacher, student and/or parent to monitor progress. ○ Increased time spent on coursework ○ Remediation with a teacher to ensure success on assignments If intervention data does not show improvement or gains in student learning, the student will be referred to the campus intervention team. Interventions may include but are not limited to weekly check-in meetings with the mentor teacher, parent and student meetings with campus administration, or a transition to face to face instruction. The campus administrators coordinate with county support services in order to meet student and family needs when deemed necessary. Students may continue or elect to enroll in school-based counseling services on campus or remotely. All services provided by support programs, including Special Education, English Language Learner, or 504 plans, will be provided remotely as available. Students may be required to meet onsite for specific services and assessments. Support Personnel Include (but not limited to): Social Worker Counseling Gifted and Talented Personnel Virtual Learning Coordinator Special Education Coordinator English Language Learner Coordinator District Content Area Specialists Great Rivers Educational Service Center Specialists
Describe the school's formative assessment plan to support student learning.	The District virtual teachers will use the current formative assessment plan in place which is embedded in the district curriculum. All course curriculum is aligned with state standards. The district curriculum specialists and building level PLCs develop formative assessments that measure student understanding and drive instruction. PLCs will review formative assessment data to determine next instructional steps based on student needs. Instructional support will also be provided by the campus and district academic coaches and specialists as needed. The

	Virtual Program will utilize the district Multi-Tiered System of Support Process (Intervention Process) to monitor and support student growth.
	Instructional decisions will be made using multiple data points, including assessment results- formative and summative, classwork, as well as student engagement data. Student engagement data includes attendance, discipline, and mobility in the current school year and in previous school years.
	Students in grades Kindergarten-10th grade onsite and virtually will complete NWEA MAP Growth multiple times per year on-site. Students will be asked to reflect on their progress and set growth goals in Reading and Math after each MAP Growth Assessment. The ACT assessment is also offered to 11th grade students which takes place onsite.
Describe how dyslexia screening and services will be provided to digital learning students.	Screening Process: Universal and Level 1 screenings are done virtually based on the procedure of the assessment. Level II screeners are completed in person.
	Services are provided based on the students grade level:
	7-12: Students in grades 7-12 will participate in dyslexia intervention in person at their zoned campus or virtually.
	The district will ensure all requirements of the dyslexia law are met for onsite and remote learners.
Describe how Gifted and Talented supports and services will be provided to digital learning students.	Full-time virtual GT students receive 210 minutes of asynchronous and synchronous instruction via Google Classroom per week. The GT facilitators interact with students through Google Meets. Their schedules have alternating Google Meet times with live interaction and instructions from teachers followed by brief periods of time to work either independently or with teammates. The GT teachers keep the Google Meet open even while students are working independently in case someone needs assistance; the students just call the teacher's name and she is available to answer questions. GT teachers provide optional enrichment activities and extension activities for students that may complete their work ahead time and need something additional.

	The GT Facilitators provide at least one lesson each month The classroom teachers provide the other lessons per month so students receive one 30 minute enrichment lesson per week. The GT facilitators share a Google folder with a Google Sheet where the classroom teachers document their observations and upload any work samples. This shared folder allows the GT teacher and the classroom teacher to view and discuss students. Virtual students that are referred for testing, must come onsite to be tested. Pre-AP courses for grades 7-9 will be offered virtually as well as on site. AP courses for 10-12th graders will require onsite attendance. All requirements from GT Program Approval Standards will be met for the K-12 gifted program for remote learners.
Describe how English for Speakers of Other Languages (ESOL /ESL) supports and services will be provided to digital learning students.	ESOL services are provided for identified English Language Learners (ELLs) in grades K-12. ESOL services will be provided remotely utilizing the ESOL teacher through Google Classroom and Google Meets for small groups and individually as needed three times a week for 30 minutes during a scheduled time. The ELPA21 standards, test data, and Rosetta Stone are used to guide each student's instruction. Accommodations are provided by the general education teacher for core instruction. The ESOL teacher works with the general education teacher to make sure scaffolding and differentiation are used based on each individual student's language proficiency. Frequent communication is used by the ESOL teacher to ensure our families' needs are being met. We utilize TalkingPoints for quick communication methods as well as TransACT to send home notices in their native language. During conferences, translation devices are used to communicate in their native language if a translator is not available. Our district is committed to our ESOL students and families and we adjust to meet their needs accordingly. The district will ensure LPAC plans are met for virtual students.

Describe how all special education services and supports will be provided to digital learning students, including the process for special education evaluations and conferences.	Special education services and supports will be determined by the student's IEP Committee. This committee will determine the method for delivery of services that best meets the needs of the child and agreed upon by all parties, including district and parents/guardians. Accommodations may be provided through the learning management system when necessary. Students will be scheduled onsite for special education evaluations. Conferences can be conducted by choice of parent-either virtually or onsite. Staffing ratios for Special Education services will be based on program standards, and time will be scheduled in the day for providing virtual services proportional to student enrollment. One resource teacher per grade level will be responsible for providing synchronous instruction to students attending virtually at a scheduled time each day to meet the requirement of the IEPs. Students who qualify for self-contained services and whose parents have opted for virtual instruction will be served using TeachTown. The district will ensure all Special Education rules and regulations will be followed for virtual students..
Describe common and frequently used digital accommodations that the school has provided to general education teachers to assist students in digital learning classes.	Digital accommodations include, but are not limited to: digital copies of notes, text to speech embedded in the learning platform, internet browser text reader, extended time on assignments, flexible assignments, and adaptive intervention resources. Student services committees may determine additional accommodations based on individual student need.
Teacher Supports	
Describe school supports to provide on-going digital content and instructional supports for teachers.	Teachers in the virtual program will receive initial preservice training, updated training on a regular basis, as well as additional training as the need arises. Training will support the use of the learning management systems, effective virtual instruction methods, and strategies for maintaining effective student engagement in the virtual classroom. Virtual teachers will receive additional instructional support through the PLC process led by the Virtual Program Coordinator and cooperating teachers.

Identify the daily or weekly amount of time teachers will need to develop and plan for instruction based on interaction and delivery options selected and digital supports provided. How will the school support teachers with digital content and planning?	The district provides a minimum of 200 minutes of scheduled planning time each week which is equivalent to district face-to-face staff. A Professional Learning Community (PLC) of teachers enjoys the collaborative support of their PLC meeting on a regular basis as scheduled at each campus.

The district employs specialists and coaches in various subject areas who can assist individuals or teams of teachers as needed. These specialists have come out of the ranks of our teaching staff and are well-utilized throughout our grade-bands, campuses, and subject areas.

The district will also have Virtual School teachers function as a PLC with regular meetings. Those same teachers will still participate in a subject area-specific PLC of teachers who might be in any instructional model. |

School Supports

Describe how the school will ensure equitable access to opportunities for success for digital learner's needs (poverty, homelessness, migrant, foster care, and military connected students) A link (URL) to the school equity plan may be acceptable if it meets this criteria.	The West Memphis School District does not discriminate on the basis of race, color, sex, national origin or disability in any of its policies, practices or procedures.
The district will use the following measures to ensure equitable access:
● The budgeting and use of state and federal funds to provide equitable access to educational services
● Equal access to technology devices and support in connectivity
● Coordination with district support service programs, including Special Education, 504, ESL, GT
● Utilization of the district MTSS Process for student support and intervention
All students are expected to test (statewide summative assessments) onsite as per DESE guidance. Provide an overview of how the school may communicate to parents and test digital learning students at a school site.	The district will conduct statewide assessments onsite.

Parents will be notified of the onsite testing requirement:
● during initial enrollment and acceptance in the virtual learning environment
● via district communication for all students leading up to each test administration

The district will utilize DESE guidelines when testing virtual students, which includes:
● testing virtual students as a separate cohort from their grade-level group |

	● organizing small group virtual testing rooms to accommodate the need for additional social distancing as set forth by the Arkansas Department of Health

If parents are non-compliant regarding ensuring that students are onsite for required assessments, they will have violated the contractual agreement and the student will be required to return to onsite instruction. In the event that the parent refuses to return the student to onsite instruction, a FINS (Families in Need of Service) report will be filed with the juvenile department. |
| Provide a detailed explanation of how the school will monitor and evaluate the effectiveness of the digital option(s) and the fidelity of implementation as described within this application. | The district will monitor the effectiveness of digital options with daily monitoring of attendance and grades as well as MAP testing of reading and math skills multiple times each year.

Research questions used by the district include but are not limited to those listed below.
What is the comparison of virtual and on-site achievement on MAP?
How does virtual student performance differ at various grade levels?
How many students do we have who disengaged in each learning model?
What are we doing for those who disengaged in Virtual School?
How many students are in identified intervention programs in Virtual School compared to other models or past years?

Campus and district administrators actively monitor online instruction in the LMS and CMS (Lincoln Learning, See Saw and Google Classroom postings) and grading feedback in our virtual model. Campus and district administrators can "walk in" to online classes throughout any day to monitor instructional delivery and student needs. A survey will be sent to parents of virtually attending students in the fall and spring semester to assess their views on the effectiveness of their digital choice. Monthly meetings will be held to obtain feedback from teachers serving virtual learners. This feedback will be used to make adjustments as needed. |
| Describe how the teacher(s) will engage families into the digital learning process. (School may link the District Engagement Plan if digital learning is included. The plan must address how the school will support parents/students with digital tools and resources) | Communication of virtual school activities, student support options, and daily events are shared by the administrators and teachers via email, robocalls, social media, and videos linked in many of these formats. Tutorial videos to teach parents about access, lessons, and student monitoring are provided to equip parents as partners in the education of |

	their children.
	Parents and families without internet access will be given mobile hotspots or will be provided local internet. There are also wifi hotspots located within the school district. Locations can be found on the district website at www.wmsd.net
	Our Technology Department will be available 8:00-4:00 Monday-Friday by phone and an email address will also give parents/students the option to ask questions and/or report problems after regular working hours.
Provide a URL to evidence of the local school board's approval of the waiver request(s).	Board approval on the minutes from the April 20, 2021 meeting will occur during the May 18, 2021 board meeting. https://www.wmsd.net/apps/pages/index.jsp?uREC_ID=1829112&type=d&pREC_ID=1985676
Provide a URL to evidence of stakeholder feedback regarding the waiver request(s) and the school communication plan regarding digital learning program(s).	http://www.wmsd.net/digital_learning/
Policies	
Please provide a link (URL) to the attendance policy for digital learning students.	Digital learning students will follow the same attendance policy as that for the onsite students. The URL for our student handbooks is https://drive.google.com/drive/folders/1WEH1twf5eFuN1vxWcPMezS8GLSKWqtZk
Please provide a link (URL) to the discipline policy for digital learning students.	Digital learning students will follow the same discipline policy as that for the onsite students. The URL for our student handbooks is https://drive.google.com/drive/folders/1WEH1twf5eFuN1vxWcPMezS8GLSKWqtZk
Please provide a link (URL) to the grading policy for digital learning students.	Digital learning students will follow the same grading policy as that for the onsite students. The URL for our student handbooks is https://drive.google.com/drive/folders/1WEH1twf5eFuN1vxWcPMezS8GLSKWqtZk
Charter	
Describe how the addition of a virtual program is in line with the mission or model of the school.	The Academies of West Memphis is committed to educating all students to the highest standards of excellence by providing a rigorous and varied curriculum in a safe and respectful environment. Due to the global pandemic, the Academies of West Memphis's virtual program will continue to move our students forward academically in a safe

	environment. Our partners, ASU Midsouth, will use Canvas as its digital platform to allow our career/technical students to stay on task and receive credits and certifications.

☐ **Additional Waiver(s)**

Waiver Topic #1	
Arkansas Code Annotated	
Standard for Accreditation	
ADE Rules	
Rationale for Waiver	

Waiver Topic #2	
Arkansas Code Annotated	
Standard for Accreditation	
ADE Rules	
Rationale for Waiver	

Waiver Topic #3	

Arkansas Code Annotated	
Standard for Accreditation	
ADE Rules	
Rationale for Waiver	

Waiver Topic #4	
Arkansas Code Annotated	
Standard for Accreditation	
ADE Rules	
Rationale for Waiver	

Waiver Topic #5	
Arkansas Code Annotated	
Standard for Accreditation	
ADE Rules	
Rationale for Waiver	