

Rules of the Road:

How Board Rule Supports the Strategic Plan

Law & Licensing September 2026

Rules of the Road

Connecting Board Oversight to the Strategic Map

Today's Objective:

Provide committee members with a 4-part system
(Establish -> Identify -> Verify -> Rectify) in order to:

1. evaluate rule effectiveness, and
2. locate operational bottlenecks.

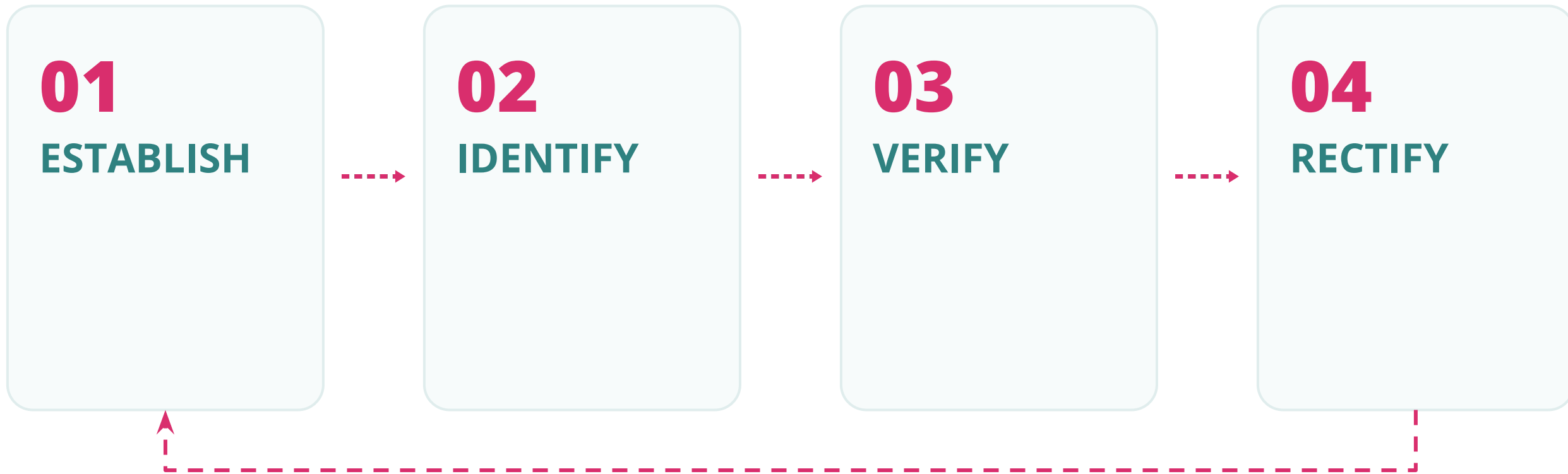
Connecting Board Oversight to the Strategic Goals and Priorities



Optimize Oversight & Accountability

- Clearly communicate required expectations.
- Strengthen risk assessment and mitigation processes to improve internal controls.
- Support and monitor entities under the Board's supervision to ensure compliance.
- Direct performance improvement steps.

“Optimizing Oversight & Accountability” in Board Rule



01: Establishing Expectations

Clearly communicate required expectations

01
ESTABLISH

02
IDENTIFY

03
VERIFY

04
RECTIFY

UNIVERSAL EXPECTATIONS

R277-113: LEA Fiscal Governance

R277-484: Data Standards

R277-419: Pupil Accounting

R277-217: Educator Standards and Local Education Agency (LEA) Reporting

R277-328: Equal Opportunities in Education

DOMAIN-SPECIFIC EXPECTATIONS

R277-929: State Council on Military Children

R277-731: Applied Professional Education Experience (APEX) Grant Program Policy

R277-730: Kindergarten Programs

R277-911: Secondary Career and Technical Education

02: Identifying Noncompliance

Support and monitor entities under the Board's supervision to ensure compliance

01
ESTABLISH

02
IDENTIFY

03
VERIFY

04
RECTIFY

UNIVERSAL DETECTION

R277-108: Assurance Document

R277-114: Oversight, Accountability, and Compliance

R277-104: ADA Complaint Procedure

R277-123: Public Hotline

R277-217: Educator Standards and Local Education Agency (LEA) Reporting

DOMAIN-SPECIFIC DETECTION

R277-477-8: School Land Trust Annual Expenditure & Plan Reviews

R277-461: Elementary School Counselor Grant Program

R277-473: K-12 Computer Science for Utah Grant

R277-407: School Fees

R277-462: Comprehensive School Counseling Program

03: Verifying Noncompliance

Support and monitor entities under the Board's supervision to ensure compliance

01
ESTABLISH

02
IDENTIFY

03
VERIFY

04
RECTIFY

UNIVERSAL VERIFICATION

R277-116: Audit Procedures

R277-123-9: Hotline Escalation

R277-104-5: ADA Complaint Procedure

R277-210 to -217: UPPAC Tracks

R277-750: Education Programs for Students with Disabilities

DOMAIN-SPECIFIC VERIFICATION

R277-477-8: School Land Trust Annual Expenditure & Plan Reviews

R277-609: Standards for LEA Discipline Policy

R277-488-7: Dual Language Immersion Program

R277-727: School Meals Program

04: Rectifying Noncompliance

Direct performance improvement steps

01
ESTABLISH

02
IDENTIFY

03
VERIFY

04
RECTIFY

UNIVERSAL REMEDIATION

R277-114: Corrective Action & Appeal

R277-215 & 216: UPPAC Action

R277-750: Education Programs for Students with Disabilities

R277-484-9: Data Standards

R277-113: LEA Fiscal Governance

DOMAIN-SPECIFIC REMEDIATION

R277-555: Corrective Action Against Charter School Authorizers

R277-407: School Fees

R277-462: Comprehensive School Counseling Program

R277-477: Distributions of Funds from the Trust Distribution Account and Administration of the School LAND Trust Program.

Spotlight Example: Rule R277-608 in Action

01: ESTABLISH EXPECTATIONS

- **§ R277-608-3 & 11:** Mandates written LEA policies prohibiting corporal punishment, chemical restraints, and unapproved mechanical restraints.
- **§ R277-608-4:** Sets 2-tier mandatory training: Foundational for all student-supervising staff and Comprehensive ESI for key identified staff.
- **§ R277-608-7:** Establishes physical build standards for seclusion rooms (e.g., push panels, door requirements, retrofitting timelines by 2032).



02: IDENTIFY NONCOMPLIANCE

- **§ R277-608-5(5), (7), (13):** Mandates immediate parent/admin notification (15 minutes) and required logging in SIS records following any physical restraint or seclusion.
- **§ R277-608-10:** Requires annual LEA safety inspections of all seclusion rooms and annual board assurances to USBE.
- **§ R277-608-12:** Mandates annual collection and submission of LEA-wide ESI incident data to the Superintendent.



03: VERIFY NONCOMPLIANCE

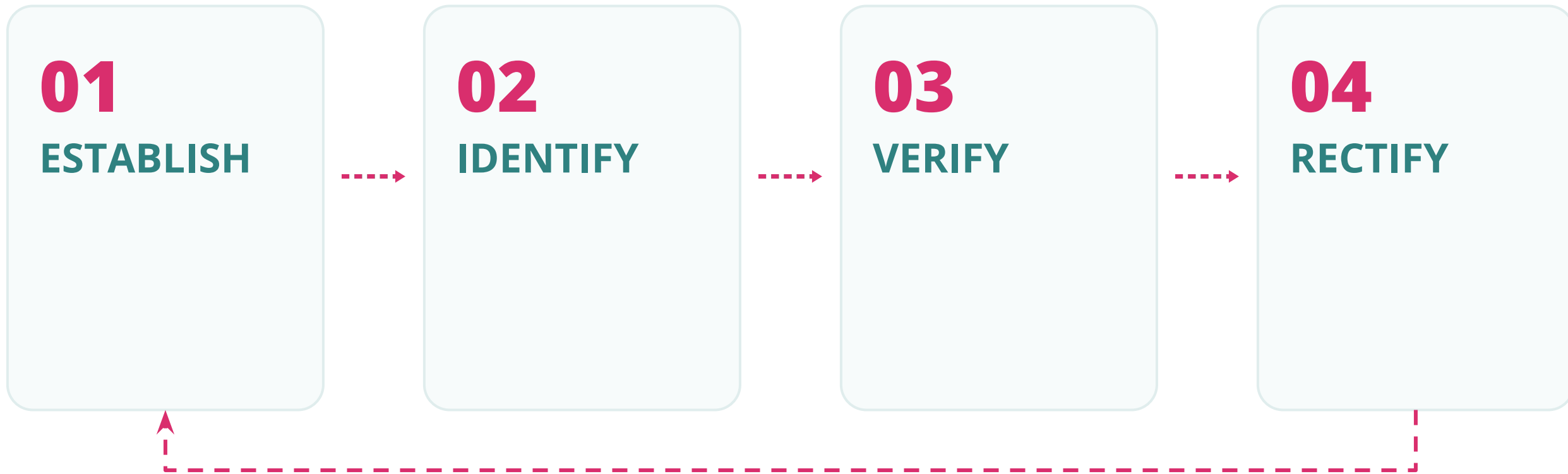
- **§ R277-608-6:** Requires every LEA to establish an ESI Committee (admin, behavior specialist, educator, parent) to regularly review incident documentation.
- **§ R277-608-13(2), (4):** Mandates Superintendent periodic reviews of submitted ESI data, physical room compliance, and special behavior plans under R277-750 and R277-609.



04: RECTIFY NONCOMPLIANCE

- **§ R277-608-9(2), (4):** Requires a formal LEA Compliance Plan for non-compliant rooms and 30-day mandatory reporting of reported room violations to USBE.
- **§ R277-608-9(6) & 608-13(6), (7):** Unresponsiveness or unmitigated violations trigger formal escalation to
 - R277-114 (CAPs),
 - R277-123 (Hotline),
 - R277-211 (UPPAC), or
 - R277-750 (Special Education).

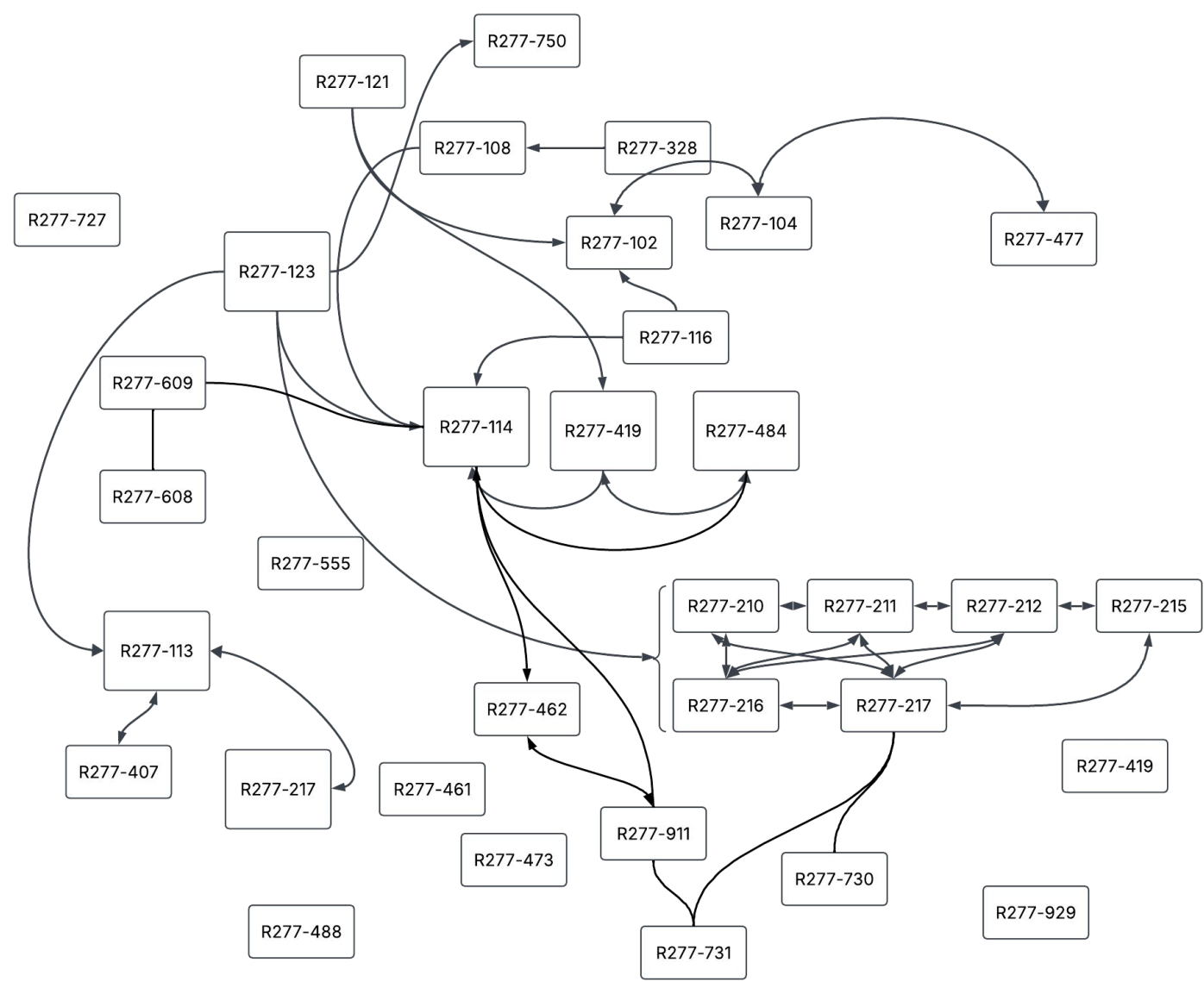
Four Parts of Optimizing Oversight & Accountability



Rules Mapped to Role in Internal Controls

Rule & Policy Description	Establish	Identify	Verify	Rectify
R277-113 LEA Fiscal & Auditing Policies	●	●	●	
R277-114 Oversight, Accountability & Compliance	●	●	●	●
R277-116 Audit Procedure		●	●	●
R277-123 Reporting Violations (Hotline)		●	●	●
R277-102 Adjudicative Proceedings			●	●
R277-121 Board Waiver of Admin Rules	●			
R277-750 Special Education Programs	●	●		
R277-108 Annual Assurances	●	●		
R277-211 UPPAC Definitions & Jurisdiction	●	●	●	●
R277-212 UPPAC Hearing Procedures			●	●
R277-217 Utah Educator Standards	●	●		
R277-407 School Fees	●	●	●	●

Rules Mapped to Each Other



Moving Forward

Year-Long Project Plan to align program risk assessment, monitoring, and compliance processes

Phase & Timeline	Focus Area	Key Deliverables	Strategic Value to Board
Phase 1 <i>(Completed)</i>	Agency Program Self-Assessments & Leadership Review	• Program Self-Assessment Profiles across all agency teams • Agency Leadership Presentations • Inventory of Statutory/Rule Basis, Funding Sources, & Oversight Frameworks • Initial Roster of Open Questions & Operational Gaps	Establishes a comprehensive, ground-level inventory of all active agency programs, legal authorities, and baseline operational realities.
Phase 2 <i>Report out: April 2026</i>	Data Synthesis, Baseline Audit & Gap Matrix	• Program Statutory Crosswalk • Compliance & Statutory Deficit Matrix • Legislative / Rule Cleanup Recommendations	Synthesizes assessment data to guarantee every program has explicit legal authority, aligned rules, and clear legislative priorities.
Phase 3 <i>Report out: June 2027</i>	Template Development	• Standardized Risk Assessment Tool • Compliance Monitoring Plan Template • Standardized Corrective Action Plan (CAP) Workflow	Establishes R277-114 compliance consistency, predictable LEA oversight, and quarterly Board reporting.
Phase 4 <i>Report out: September 2027</i>	Agency Program Migration & System Rollout	• Program Risk Tiers & Scoring • Document All Active Monitoring Protocols per Program • Integration into Centralized Tracking Database	Provides complete agency-wide visibility into risk profiles, compliance trends, and active corrective actions.
Phase 5 <i>Report out: November 2027</i>	Legislative Ingestion & Onboarding Plan	• Post-Session Legislative Intake Protocol • Agency Compliance Operational Handbook • Annual Program Review Cycle	Ensures newly legislated programs are fully risk-assessed, compliant, and monitored from Day 1.