### PARAMOUNT COLLEGIATE ACADEMY

### SBE APPEAL PACKET

### **Enclosure 2**

District Board Minutes (Evidence of Charter Denial) District Board Findings of Fact for Denial Charter School Response to District Findings of Fact for Denial



### San Juan Unified School District Board of Education 3738 Walnut Avenue, Carmichael, California 95608

### Board of Education Minutes November 18, 2014

Regular Meeting Board of Education 5:15 p.m.

#### Call to Order

The November 18 regular meeting was called to order by the president, Lucinda Luttgen.

#### Roll Call

Present: Lucinda Luttgen, President Pam Costa, Vice President Saul Hernandez, Clerk Greg Paulo, Member Absent: Larry Masuoka, Member

#### Recess: Closed Session

The meeting was immediately recessed with the Board convening in closed session to consider student expulsions in five cases (Education Code §48918[f]); one personnel matter; and discussion with Negotiator Jim Shoemake regarding CSEA Chapter 127 general/operations support, Chauffeurs/Teamsters Local No. 150 transportation, Supervisors, SJTA, and SJPEC (Government Code §54957.6).

### Pledge of Allegiance

At 6:30 p.m., four members of the Casa Roble Fundamental High School Air Force Jr. ROTC led the group in the Pledge of Allegiance.

#### Minutes Approved

It was moved by Mr. Paulo, seconded by Ms. Costa, that the minutes of the October 28 regular meeting be approved. MOTION CARRIED UNANIMOUSLY [Luttgen, Costa, Hernandez, Paulo].

#### Recognition (E-1 a)

Mr. Kern read resolution A-337 honoring Dr. Larry Masuoka for serving two terms on the Board of Education and his many contributions to San Juan Unified School District. Dr. Masuoka has also received a resolution from the California State Senate and a Certificate of Recognition from California State Assembly. It was moved by Mr. Hernandez, seconded by Ms. Costa, that the adoption of Resolution A-337, honoring Larry Masuoka, for his two terms of service to the San Juan Unified School District Board of Education be approved. MOTION CARRIED UNANIMOUSLY [Luttgen, Costa, Hernandez, Paulo].

### Board/Staff Reports (E-2)

Mr. Paulo reported that he visited Golden Valley Charter School campus.

Ms. Costa attended the Measure N High School Signature Project forums, and the Barrett Middle School production of Motown. Ms. Costa also attended a presentation by Myron Dueck at Mesa Verde High School on Saturday November 15. Mr. Dueck spoke on using sound assessment strategies to implement Common Core. Mr. Dueck will be speaking in the Sacramento area again in May, 2015, and Ms. Costa encouraged board members to attend.

### District High School Student Council (E-3)

High School Student Council representatives William Mendoza and Stevie Brown from Encina Preparatory High School, and Jazlyn Diaz and Eric Tassev from San Juan High School updated the Board on the goals, activities, and achievements at their respective schools.

#### Board-appointed/District Committees (E-4)

Mr. Yniguez, Chairman, of the Facilities Transportation and Finance Committee, reported that the Committee met on November 4. Mr. Yniguez stated that a presentation detailing the Sylvan Middle School facility needs was presented by the Community Architecture firm. The committee unanimously agreed to support the recommendation of the Superintendent, but had two additional recommendations: 1) The District utilize the Strategic Plan to guide the planning process and that the Division of Teaching and Learning become involved immediately, and 2) all Sylvan Middle School students remain at the existing Sylvan Campus until all renovations are complete at the Citrus Heights Elementary campus. The Facilities, Transportation & Finance Committee feels that the Superintendent's recommendation is the best of many unenviable alternatives. Mr. Yniguez stated that with the anticipation of new members being appointed, the committee feels it is time to revisit the Brown Act, and rules and regulations that govern collective bargaining. The Committee will look to district staff to educate them on these matters.

Mr. Eric Bakke, Chairman of the Citizens Oversight Committee, reported the activities from the Committee's meetings on July 22, September 16, and November 6. The committee has worked with Brett Mitchell, Bond Manager, to develop a system of reviewing "Project Scope Statements" prior to Board approval. This will allow the Citizens Oversight Committee to have an opportunity to review the expenditure of bond funds in advance of any contract being signed. Mr. Bakke stated that the purpose and function of the Citizens Oversight Committee is to ensure that bond funds are spent in compliance with the bond language authorized by the voters and are spent in accordance with the Proposition 39 statutes. The Committee believes the proposed recommendation is an eligible use of Measure N bond funds and reflects a prudent use of bond funds. Mr. Bakke reported that the Committee has added new member, David Wolfe. Mr. Kip Skidmore has been re-elected to serve as vice-chair for another one-year term, and Mr. Eric Bakke was re-elected to serve another one-year term as chair in July.

#### Closed Session: Expulsions (E-7)

It was moved by Mr. Hernandez, seconded by Mr. Paulo, that the hearing panels' recommendation be accepted as written, that the stipulated agreements be accepted as written, expelling students in case nos. S-08 and S-11; and that the stipulated agreements be accepted as written, suspending the expulsion of students in case nos. S-09 and S-16; and enrolling a student in case no. OS-14. MOTION CARRIED UNANIMOUSLY [Luttgen, Costa, Hernandez, Paulo].

#### Visitor Comments (F)

Amanda Bersamin, parent, spoke of a concern regarding the security of the San Juan student portal system and the potential for being hacked by other students. Carl Fahle, Senior Director of Technology Services will follow up with Ms. Bersamin.

#### Consent Calendar Approved (G-1/G-6)

After pulling item G-1, it was moved by Mr. Hernandez, seconded by Mr. Paulo, that the consent calendar items G-2/G-6 be approved. MOTION CARRIED UNANIMOUSLY [Luttgen, Costa, Hernandez, Paulo].

Purchasing Contracts Report (G-2) - purchase orders, service agreements, change orders, and construction bids, - approved as submitted.

Business/Financial Report (G-3) - notices of completion - approved as submitted.

#### Gifts (G-4)

Acceptance of gifts to the following schools: Cambridge Heights K-5, Encina Preparatory High School, Mission Avenue Open School, San Juan High School.

#### Student Body Donations (G-5)

Approval of the following student body donations: Casa Roble Fundamental High School – Student Body Dance Team - \$140.88 to the Amyotrophic Lateral Sclerosis (ALS) Association.

### 2014-2015 Single Plan for Student Achievement (G-6)

Approval of the 2014-15 San Juan Unified School District school sites' Single Plan for Student Achievement.

#### Consent Calendar (continued) (H)

Personnel (G-1) - appointments, leaves, separations, and job descriptions - all approved as submitted.

Ms. Costa recused herself, due to conflict of interest, from the vote. It was then moved by Mr. Paulo, seconded by Mr. Hernandez, that consent calendar item G-1 be approved. MOTION CARRIED.

AYES: Luttgen, Paulo, Hernandez NOES: None ABSTAINED: Costa

### Sylvan Middle School Facility Recommendation (I-1)

Public Comment:

Two people spoke in support of the Superintendent's recommendation and one person spoke against the Superintendent's recommendation.

Mr. Kern presented an overview of the Sylvan Middle School facilities analysis and the recommendation that the Board approve the following recommendation: (1) Consolidate Citrus Heights Elementary School with Carriage Drive Elementary K-5 School beginning with the 2015-16 school year and assign the current Citrus Heights Elementary boundary area to the new combined school. (2) Authorize modernization of the Citrus Heights Elementary School campus to provide the community of Citrus Heights with a quality middle school facility. (3) Move Sylvan Middle School to the modernized Citrus Heights Elementary School facility beginning with the 2016-17 school year.

Mr. Hernandez stated that he and Ms. Costa met with two Citrus Heights Elementary autism preschool teachers. The teachers indicated that it is important that the autism program have separate bathrooms. Staff addressed this concern and affirmed that there will be a separate bathroom exclusive to that program. Restrooms will be inside the classroom for the preschool and autism program that will move to Arlington Heights Elementary School.

Mr. Paulo stated that the Board has had numerous opportunities to hear many points of view and evaluate the information collected. Mr. Paulo stated that he favored another option. He stated that by maintaining underutilized facilities, the District is depleting general funds and unable to support many programs. Mr. Paulo recommended a zero cost option: move Sylvan Middle School students to Mesa Verde High School, and move Mesa Verde High School students to San Juan High School. This option would take two under-enrolled high schools and utilize the facility more efficiently, while allowing the District to support programs in the arts, sports, and academics, and improve enrollment. Mr. Paulo stated that he will support the Superintendent's proposal, but it is not his first choice. Putting off this decision for another year puts the Sylvan students in a grossly substandard facility. This is a compromised solution that will make some people happy and displease others.

Ms. Luttgen stated that she spent a great deal of time evaluating why she will be voting the way that she will be voting this evening. The Board is responsible for the entire district balancing the needs of all 45,000 students against the needs of each of the smaller communities. Board members are elected to hear the voices of not only individual taxpayer and parents, but the collective voice of each community and the interest of the San Juan District at-large. The Board has spent a year of thoughtfully discuss and evaluating what the most prudent use of money, resources, and people will be regarding the children at Citrus Heights Elementary School, Sylvan Middle School, and Carriage Drive Elementary School. Ms. Luttgen stated that she does not contemplate closing Sylvan, but moving the school 100 feet to a modernized, up-to-date campus that will promote 21st century learning for all students. Ms. Luttgen noted that the school name and staff will not change. The staff and students deserve a facility that is safe and will allow for academic programs that will prepare students for success. Citrus Heights Elementary and Carriage Drive Elementary seem compatible for a merger. The two schools are similar in their enrollment capacity and their API scores show a similar pattern of achievement. The state considers an API of 800 the achievement benchmark for all schools; Citrus Heights Elementary and Carriage Drive are close to reaching that level of achievement. Moving the Carriage sixth graders to a middle school or a K-8 will put Carriage Elementary more in-line with the rest of San Juan elementary K-5 schools. Running too many different versions of the elementary system makes for a difficult alignment of resources. Special education classrooms will be kept intact with teachers and students moving together. Ms. Luttgen stated she will be voting to support the Superintendents recommendation.

Ms. Costa stated that this decision is a no win situation. Some people will feel like their voice wasn't heard. The Board and staff have made every effort to look at any number of possible options. Ms. Costa stated that her decision became apparent after walking the campus at Sylvan Middle School, and hearing from staff that the conditions of the facility were not conducive to learning, and that this decision cannot be postponed any further. Ms. Costa stated that the Board has a responsibility to the Sylvan Middle School students to provide a facility that will allow 21<sup>st</sup> century learning. Ms. Costa noted that when the DRL Group graded the schools, it was clear that Citrus Heights Elementary and Arlington Elementary were in better repair, and for that reason, she will vote to support the Superintendent's recommendation.

It was moved by Ms. Costa, seconded by Mr. Hernandez, that the following recommendations by the Superintendent be approved: (1) Consolidate Citrus Heights Elementary School with Carriage Drive Elementary K-5 School beginning with the 2015-16 school year and assign the current Citrus Heights Elementary boundary area to the new combined school. (2) Authorize modernization of the Citrus Heights Elementary School campus to provide the community of Citrus Heights with a quality middle school facility. (3) Move Sylvan Middle School to the modernized Citrus Heights Elementary School facility beginning with the 2016-17 school year. MOTION CARRIED UNANIMOUSLY [Luttgen, Costa, Hernandez, Paulo].

### Paramount Collegiate Academy Charter School Petition (I-2)

Visitor comments:

Thirteen people spoke in favor of supporting the Paramount Collegiate Academy Charter School petition.

Donna O'Neil, Ed.D., Associate Superintendent of Schools and Student Support, reported that the Paramount Collegiate Academy Charter School has petitioned the District to approve its operation as a college preparatory STEM 6-12 independent charter school. A public hearing was held on September 23 and discussion by the Board on October 28. The Paramount Collegiate Academy Charter School petition has been reviewed by the District's charter review team. The District's charter review team is recommending that the petition be denied.

Mr. Hernandez asked Dr. O'Neil if the staff has considered any conditional opportunities for Paramount Collegiate Charter Academy. Staff responded to Mr. Hernandez's questions stating that the review of a charter petition is driven by state law; it requires that a team analyze each part of the educational program to assure that the program can show measureable student outcomes. Paramount Collegiate Academy Charter School did not meet the criteria to demonstrate a sound program.

Ms. Costa stated that she had read the charter petition, agreed with the District's charter review team findings and their recommendation to deny the petition.

Mr. Paulo stated that item three and four are contained by California Education Code and very descriptive. Mr. Paulo asked staff to discuss item 1 and 2. Staff stated that while the District's charter review team highly commends Paramount Collegiate Academy Charter for their vision, the review team had to send fifty-five clarifying questions, which indicates that the petition, across the board, had a number of areas that lacked sufficient detail to assure that he program would be successfully implemented. The review team did not get the responses back to provide assurance that these areas of deficiencies would be clarified. The review team had concerns in the following areas: financial, access of special education and English language learners to core curriculum, and measure of student outcomes. The review committee did not find that this program could be successful in the future.

It was moved by Mr. Paulo, seconded by Ms. Costa, to approve the Superintendent's recommendation that the petition of the Paramount Collegiate Academy Charter School be denied.

MOTION CARRIED UNANIMOUSLY [Luttgen, Costa, Hernandez, Paulo].

Golden Valley Charter School of Sacramento II (I-3)

Dr. O'Neil reported that, in compliance with California Education Code section 47605, the Board of Education formally received the Golden Valley Charter School II petition during the October 14, 2014 board meeting, at which time a public hearing was held. The District's charter school review team has evaluated the petition over the past two months. District staff recommends that the Board grant conditional approval of the Golden Valley Charter School II charter petition for a term of two years to begin on June 30, 2015 and end on June 29, 2017, which will allow time for the Golden Valley Charter School II staff to make corrections and improvements to the financial plan. The recommended start date of the charter will allow Golden Valley Charter School II to receive Public Charter Schools Grant Program (PCSGP) funding to assist in financing the new school.

A memorandum of Understanding will be developed between Golden Valley Charter School II Charter and the San Juan Unified School District, to define specific financial and operational relationships between the charter and the District, and resolve other matters of mutual interest not otherwise contained within the terms of the charter.

Visitor comments:

Debbie Lenny, CEO, of Golden Valley Charter School II, requested the Board approve the petition. Ms. Lenny stated that the increase in student enrollment at two schools will not affect San Juan, but allow Golden Valley Charter School access to \$375,000 in public school grants and allow \$450 per ADA for a total of \$77,000 this coming year. She assured the Board that she will work closely with the San Juan financial staff.

Mr. Kern stated that he had a discussion with Ms. Lenny regarding concerns about the Golden Valley Charter, and that there needs to be increased transparency and leadership in the financial area. Mr. Kern thanked the charter school review team for their hard work in reviewing the petitions of the charter schools. Action was scheduled for December 9, 2014.

### State Charter School Funding: California Montessori Project Charter School Certification of Unhoused Pupils (I-4)

Mr. Camarda reported that there are no unhoused students in the San Juan Unified School District.

Following discussion, it was moved by, Ms. Costa, seconded by Mr. Hernandez, to approve the adoption of Resolution No. 2746 authorizing and approving the certification of unhoused pupils related to charter school applications for facilities funding in accordance with applicable law. MOTION CARRIED UNANIMOUSLY [Luttgen, Costa, Hernandez, Paulo].

Tentative Agreements: SJTA, SJPEC, SJSA, and CSEA (I-5 a-d)

Jim Shoemake, Senior Director of Labor Relations explained that tentative agreements have been reached between San Juan Unified School District and the following bargaining groups: San Juan Teachers Association, California

School Employees Association, San Juan Professional Educators Coalition, and San Juan Supervisors Association. For the 2014-15 school year, salaries shall be increased by a total of 4.5 %. Three percent (3.0%) shall be retroactive effective July 1, 2014, and the remaining 1.5% shall begin February 1, 2015. The three percent (3.0%) increase shall be implemented no later than December 19, 2014. The retroactive payment to July 1, 2014 shall be received no later than January 20, 2015. A special board meeting will be held on December 4, 2014 for scheduled action.

Mr. Paulo commended Mr. Shoemake, the negotiating team, and those representing the employee groups for their work on negotiations. Mr. Paulo stated that the matter of total compensation is long overdue in terms of how we bargain, especially, when we are looking to future increases that the District will be responsible for in regards to employees with CalSTERS. Mr. Paulo asked the Board to consider joining him in moving in that direction in terms of bargaining.

Salary Schedule Adjustments: SJAA and the Confidential Group (I-6 a-b)

Jim Shoemake, Senior Director of Labor Relations explained that salary schedules totaling 4.5% are being proposed for the Confidential Group, and San Juan Administrators Association (SJAA). Three percent shall be retroactive effective July 1, 2014, and 1.5% remaining shall begin on February 1, 2015. A special board meeting will be held on December 4, 2014 for scheduled action.

Annual Organizational Meeting (I-7)

It was moved by Ms. Costa, seconded by Mr. Paulo that the date of the annual organizational meeting be set for December 9, 2014 at 6:30 p.m. MOTION CARRIED UNANIMOUSLY [Luttgen, Costa, Hernandez, Paulo].

Board Advisory Committee Membership (I-8)

Mr. Paulo requested that the Board consider revising the number of seats on the board appointed committees for Curriculum, Standards, Instructional and Student Services; and Facilities, Transportation and Finance from fifteen (15) to ten (10). Additionally, it is requested that the newly elected board members be given the option to appoint their own committee members or continue with the current appointments.

Visitor comment:

Felicia Wimberly, chairwoman, Curriculum and Standards Committee, spoke against the proposal to reduce the number of members appointed to a committee.

Ms. Luttgen stated that she was in agreement of aligning the term of an appointed member with the term of the Board member. Ms. Luttgen is not in favor of reducing the number of members appointed to an advisory committee. Mr. Hernandez stated that he has a concern about reducing the number of appointments to ten. Ms. Costa stated that she supports the proposal that Board members appoint their own members.

There was discussion regarding establishing a formalized system for providing direction from the Board on issues to identify and agendize board advisory committee topics. This item will be brought back for further discussion on December 9, 2014.

Allocation of Strategic Plan Funds for Marketing of Schools and Programs (I-9)

Ms. Luttgen requested that the Board consider the allocation of \$100,000 from the Strategic Plan fund to market schools and programs. Action was scheduled for December 9, 2014.

Future Agenda (J)

Mr. Paulo requested an eligibility report from the Division of Teaching and Learning. Mr. Kern stated that this will be sent in a Board Communication.

Adjournment

At 9:05 p.m., there being no further announcements or business, the regular meeting was adjourned.

Lucinda Luttgen, President

Kent Kern, Executive Secretary

Approved: 12/09/14

rm

11/18/14



### San Juan Unified School District Division of Teaching and Learning Pupil Personnel Services

3738 Walnut Avenue, Carmichael, California 95608 Telephone (916) 971-7220; FAX (916) 971-7147

Web: http://www.sanjuan.edu

Kent Kern, Superintendent of Schools Donna O'Neil, Ed.D., Associate Superintendent Linda Bessire, Ed.D., Director

November 25, 2014

### HAND DELIVERED

Dawn Contreras Douglas Lead Petitioner/Founder/CEO Paramount Collegiate Academy

Re: Paramount Collegiate Academy Charter Petition

Dear Ms. Contreras Douglas:

The purpose of this letter is to summarize the findings of the San Juan Unified School District's Board of Education denying the Paramount Collegiate Academy ("PCA") Charter Petition.

### Finding 1. Petition presents an unsound educational program for pupils to be enrolled at the charter school.

While the Petitioners' goal is to establish a college preparatory, project-based STEAM (Science, Technology, Engineering, Arts, and Mathematics) middle/high school with a blended learning charter school, the petition fails to demonstrate a sound educational program and that it would not adequately serve students requiring special education services and English learners (EL). The petition lacks sufficient clarity and detail to be considered educationally sound. More specific analyses of the educational program are listed in Finding 3.1, below.

# Finding 2. Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

The Petitioners are unlikely to successfully implement the program presented in the petition because the Petitioners' financial plan is flawed and is not found to be reasonably comprehensive for the following reasons:

- Petition indicates that \$200 is to be spent on each new student each year which does not support the proposed instructional plan.
- Information is lacking to confirm assumptions made in the petition for LCFF State Revenue and the Federal Child Nutrition Program.
- Multi-Year projection reflects a strong reserve but, without confirming revenue, the accuracy of this projection cannot be determined.

Dawn Contreras Douglas Paramount Collegiate Academy Charter Petition November 25, 2014 Page 2

- Cash Flow Statement Projected Revenue Receipt does not align with any known payment schedules.
- Cash Flow Projection shows a positive balance each month, but this is not deemed reasonable, as
  revenue receipts cannot be supported. PCA does not identify potential sources of working
  capital.
- Projected Fund Balance is positive, however, the revenue cannot be confirmed and no source of working capital has been identified to cover any deficits.
- PCA projects an enrollment increase of 75% for year two which is highly unrealistic. The average annual enrollment increase across District schools and charters is 18%.

Based on the above-stated deficiencies and possible lack of understanding of legal budget requirements, the Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

### Finding 3. Petition does not contain reasonably comprehensive descriptions of certain required elements.

The petition does not contain reasonably comprehensive descriptions of three of the sixteen specific required elements set forth in Education Code section 47605(b)(5); specifically, descriptions of the educational program, measureable pupil outcomes, and measurement of pupil progress towards outcomes.

<u>Finding 1:</u> The petition presents an unsound educational program for students to be enrolled in the charter school.

- No timeline or information in the Petition explains how the school will transition to IB
  over time nor does the budget include costs for IB training or for WASC accreditation.
- Measureable student outcomes are generally vague and rely primarily on the STAR model which sunsets on June 30, 2014.
- Few solid targets for acceptable levels of outcomes are described other than for attendance and references to performing "better than the district average."
- Required grading policy and minimum skill levels were not included.

<u>Finding 2:</u> Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

- Proposed budget/cash flow for the first three years is of concern.
- Expenses do not appear reasonable for equipment and books for the start-up.
- Student enrollment and projected growth in ADA seems significantly higher than appears to be reasonable.
- Projected enrollment numbers are not consistent throughout the Petition.
- Petition failed to provide any evidence of parental support.
- Petition does not clearly identify the students' current level of achievement and instructional needs.
- No data was submitted on the current success of the target student group or availability of services.

Dawn Contreras Douglas Paramount Collegiate Academy Charter Petition November 25, 2014 Page 3

<u>Finding 3</u>: The Petition does not contain reasonably comprehensive descriptions of certain required elements.

- Fails to provide a comprehensive description of its educational program.
- Fails to provide a comprehensive description of its student outcomes specific to its projected subgroups and on a school-wide basis.
- Fails to provide a comprehensive description of its budget and the Human Resource personnel requirements of a charter school.

As stated in Finding 1, the petition does not clearly describe the model to be used to meet the needs of students with special needs who qualify for special education services. Three options are proposed, yet the language is confusing and shows a lack of understanding of how special education programs and funding operate within the District.

Petition does not address how students with special needs will access the core curriculum, there are no references to any type of special education program or to the full continuum and program options such as RSP, DIS, SDC, NPS, etc., nor how transportation will be provided in order to access special education services.

No interventions are identified or described for students with special education needs, EL students, or students who are unable to meet the proposed graduation requirements, especially in the area of mathematics.

While there is a description of Specially Designed Academic Instruction in English (SDAIE) strategies, a lack of detail regarding intervention support makes it unlikely that interventions can be successfully implemented.

Petition provides insufficient descriptions about the implementation of Common Core State Standards and ELD standards.

Petition presents information about the initial identification of EL students using the CELDT test; however, there is no elaboration on how the CELDT results will be used to inform the instructional program placement.

Based upon the above listed deficiencies, the petition does not contain a reasonably comprehensive description of the Educational Program.

A. Description of Measurable Pupil Outcomes is not found to be reasonably comprehensive for the following reason:

Petition does not consistently indicate specific goals for each measurable outcome but rather merely states that the measurable outcomes for PCA will be above or higher than similar District schools. No annual goals identify expected increase in students' performance rates and therefore growth expectations cannot be measured. As a result, critical program analysis and changes to instructional practices based upon student needs and performance cannot be made.

Based upon the above deficiency, the petition does not contain a reasonably comprehensive description of the Measurable Pupil Outcomes identified for use by the charter school.

Dawn Contreras Douglas Paramount Collegiate Academy Charter Petition November 25, 2014 Page 4

B. Description of Methods to Assess Pupil Progress towards Outcomes is not found to be reasonably comprehensive for the following reason:

Petition lacks sufficient detail on how outcomes will be measured, at what frequency and, more importantly, how the resulting data will be used in a clear manner to inform teachers and parents about student progress. Without this detail, the impact of student performance on classroom instruction and the overall program quality cannot be determined.

Based upon the above deficiency, the petition does not contain a reasonably comprehensive description of the Measurement of the methods to assess Pupil Progress towards outcomes.

### Conclusion:

Based on the foregoing, the Superintendent recommended the Board of Education deny the PCA petition due to the following:

- 1. The petition presents an unsound education program for pupils to be enrolled in the charter school (Education Code section 47605(b)(1)).
- It is demonstrably unlikely that the Petitioners will successfully implement the program set forth in the petition.
- 3. The petition does not contain reasonably comprehensive descriptions of all the items required by Education Code section 47605(b)(5), including the description of its educational program, measurable student outcomes, and budget requirements of a charter school.

On November 18, 2014, the Board of Education took action to deny PCA's charter petition. The minutes from that meeting will be approved by the Board at its next regularly scheduled meeting on December 9, 2014.

Sincerely,

Linda M. Bessire, Ed.D., Director

Pupil Personnel Services

LMB/dh

c: Kent Kern, Superintendent of Schools

Donna O'Neil, Associate Superintendent, Schools and Student Support

Linda C. T. Simlick, General Counsel



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> Kent Kern, Superintendent of Schools Donna O'Neil, Ed.D., Associate Superintendent Linda M. Bessire, Ed.D., Director

VIA EMAIL October 28, 2014

Ms. Dawn Contreras-Douglas Lead Petitioner Paramount Education 3510 Hazeltine Lane Roseville, CA 95747

Re: Paramount Collegiate Academy Charter School Petition Findings

Dear Ms. Contreras-Douglas:

This letter is in response to your request for the findings of the District's Charter Review Team. The findings are explained below:

According to the Charter Schools Act of 1992, a governing board may not deny a petition unless it sets forth specific facts to support one or more of the following five findings:

- 1. Charter school presents an unsound educational program for the students to be enrolled.
- Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
- Petition does not contain the number of signatures required by Education Code section 47605, (a)(1)(A) or (a)(1)(B).
- Petition does not contain an affirmation of certain specific conditions set forth in Education Code section 47605(d), (e.g., nonsectarian; admit all students; use of public random lottery, if needed, for admission).
- 5. Petition does not contain reasonably comprehensive descriptions of all of the 16 elements listed in Education Code section 47605(b)(5)(A-P).

As of July 1, 2013, charter petitions must include a reasonably comprehensive description of the charter school's annual goals to be achieved in the eight state priorities and the specific annual actions to achieve those goals. (Education Code §§47605(b)(5)(A)(ii) and 52060(d)). To be "reasonably comprehensive," the Review Team considered whether a description includes information that is substantive; includes elaboration; addresses all aspects of the required charter petition elements; is specific to the charter petition being proposed; describes the program to a sufficient degree that improves pupil learning; increases learning opportunities for pupils of all backgrounds and abilities; expands educational opportunities; and for which accountability and legal compliance can be reasonably foreseen and assured. Mere quoting of the law or general statements of educational practices without letailed information of how it will be accomplished by the petitioner do not suffice. (5 Cal. Code Regs., §11967.5.1(g)).

Dawn Contreras-Douglas
Re: Paramount Collegiate Academy Charter School
October 28, 2014
?age 2

It is recommended that the Board adopt the Review Team's findings of fact as its own findings and deny the petition on the following grounds, pursuant to Education Code section 47605:

- Charter school presents an unsound educational program for pupils to be enrolled in the charter school (Education Code section 47605(b)(1)).
- Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition (Education Code section 47605(b)(2)).
- 3. Petition does not contain reasonably comprehensive descriptions of certain required elements set forth in Education Code section 47605, subdivisions (b)(5)(A-P).

The specific findings of fact that support the aforementioned grounds for denial are as follows:

### Finding 1. Petition presents an unsound educational program for pupils to be enrolled at the charter school.

The Review Team concludes that while the petitioners' goal is to establish a college preparatory, project-based STEAM (Science, Technology, Engineering, Arts, and Mathematics) middle/high school with blended learning charter school, the petition fails to demonstrate a sound educational program and that it would not adequately serve students requiring special education services and English Learners (EL). The petition lacks sufficient clarity and detail to be considered educationally sound. More specific analyses of the educational program are listed in Finding 3.1, below.

# Finding 2. Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

The Review Team concludes that the petitioners are unlikely to successfully implement the program presented in the petition because the petitioners' financial plan is flawed and is not found to be reasonably comprehensive for the following reasons:

- Petition indicates that \$200 is to be spent on each new student each year which does not support the proposed instructional plan.
- Information is lacking to confirm assumptions made in the petition for LCFF State Revenue and the Federal Child Nutrition Program.
- Multi-Year projection reflects a strong reserve but, without confirming revenue, the accuracy of this
  projection cannot be determined.
- Cash Flow Statement Projected Revenue Receipt does not align with any known payment schedules.
- Cash Flow Projection shows a positive balance each month, but this is not deemed reasonable, as
  revenue receipts cannot be supported. PCA does not identify potential sources of working capital.
- Projected Fund Balance is positive, however, the revenue cannot be confirmed and no source of working capital has been identified to cover any deficits.
- PCA projects an enrollment increase of 75% for year two which is highly unrealistic. The average annual enrollment increase across District schools and charters is 18%.

Based on the above-stated deficiencies and possible lack of understanding of legal budget requirements, the petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

Dawn Contreras-Douglas Re: Paramount Collegiate Academy Charter School October 28, 2014 'age 3

## Finding 3. Petition does not contain reasonably comprehensive descriptions of certain required elements.

The Review Team concludes that the PCA petition does not contain reasonably comprehensive descriptions of three of the 16 specific required elements set forth in Education Code section 47605(b)(5); specifically, descriptions of the educational program, measureable pupil outcomes, and measurement of pupil progress towards outcomes.

# 1. <u>Description of the Educational Program is not found to be reasonably comprehensive for the following reasons:</u>

- As stated in Finding 1, the MYP-IB program is listed in the PCA Curriculum Matrix as a course option
  for grades 6-12. However, the MYP-IB program is designed for middle years, not high schools. There
  is an apparent lack of understanding of the International Baccalaureate (IB) program as this requires a
  multi-year application and approval process and is implemented school wide, not for individual student
  needs as written by the petitioners. Additionally, there are no funds designated for the required staff
  training or IB program expenses, which should be expected when implementing the IB program.
- As stated in Finding 1, the petition does not clearly describe the model to be used to meet the needs of
  students with special needs who qualify for special education services. Three options are proposed, yet
  the language is confusing and shows a lack of understanding of how special education programs and
  funding operate within the District.
- Petition does not address how students with special needs will access the core curriculum, and there are
  no references to any type of special education program or to the full continuum and program options:
  RSP, DIS, SDC, NPS, etc., nor how transportation will be provided in order to access special education
  services.
- No interventions are identified or described for students with special education needs, EL students, or students who are unable to meet the proposed graduation requirements, especially in the area of mathematics.
- There is a description of Specially Designed Academic Instruction in English (SDAIE) strategies; however a lack of detail regarding intervention support makes it unlikely that intervention can be successfully implemented.
- Petition provides insufficient descriptions about the implementation of Common Core State Standards and ELD standards.
- Petition presents information about the initial identification of EL students using the CELDT test.
   However, there is no elaboration on how the CELDT results will be used to inform the instructional program placement.

Based upon the above listed deficiencies, the petition does not contain a reasonably comprehensive description of the Educational Program.

# 2. <u>Description of Measurable Pupil Outcomes is not found to be reasonably comprehensive for the following reason:</u>

Petition does not consistently indicate specific goals for each measurable outcome but rather merely
states that the measurable outcomes for PCA will be above or higher than similar District schools. No
annual goals identify expected increase in students' performance rates and therefore growth expectations
cannot be measured. Therefore critical program analysis and changes to instructional practices based
upon student needs and performance cannot be made.

Dawn Contreras-Douglas Re: Paramount Collegiate Academy Charter School October 28, 2014 Dage 4

Based upon the above deficiency, the petition does not contain a reasonably comprehensive description of the Measurable Pupil Outcomes identified for use by the charter school.

- 3. Description of Methods to Assess Pupil Progress towards Outcomes is not found to be reasonably comprehensive for the following reason:
  - Petition lacks sufficient detail on how outcomes will be measured, at what frequency and, more importantly, how the resulting data will be used in a clear manner to inform teachers and parents about student progress. Without this detail, the impact of student performance on classroom instruction and the overall program quality cannot be determined.

Based upon the above deficiency, the petition does not contain a reasonably comprehensive description of the Measurement of the methods to assess Pupil Progress towards outcomes.

### Conclusion:

Based on the foregoing, it is recommended that the Board deny the PCA petition due to the following:

- 1. Charter school presents an unsound education program for pupils to be enrolled in the charter school (Education Code section 47605(b)(1)).
- 2. It is demonstrably unlikely that the petitioners will successfully implement the program set forth in the petition.
- 3. Petition does not contain reasonably comprehensive descriptions of all the items required by Education Code section 47605(b)(5), including the description of its educational program. measurable student outcomes, and budget requirements of a charter school.

Please do not hesitate to contact me in the future with questions.

Sincerely.

levida M. Benne Linda M. Bessire, Ed.D., Director

Pupil Personnel Services

Kent Kern, Superintendent

Donna O'Neil, Ed.D., Associate Superintendent

# Paramount Collegiate Academy

Petitioner(s)' Responses to
Ny Office of Education Findings for Denial

Review Team & Governance Board

Written Findings

Written Findings

Submitted on Appeal to the Sacramento County Office of Education December 17, 2014

accs-apr15item09 Attachment 7 Page 15 of 259 \*NOTE:

Petitioner(s) requested all findings used in the District Review Team's recommendation to deny the Paramount Collegiate Academy Charter. A letter dated October 28, 2014 was emailed to Petitioner(s), listing District Review Team Findings. The Petitioner(s) later requested a letter from the District showing evidence of the Governing Boxer's action to deny the PCA Petition to satisfy requirements for an appeal packet submission to the Sacramento County board of Education (SCOE). A letter dated November 25, 2014, was provided to the Petitioner(s), which included the evidence of denial statement needed for an appeal submission. This letter included additional findings not previously shared with Petitioner(s).

The table on the following pages includes the Petitioner(s)' Responses to all findings provided to the Paramount Collegiate Academy Petitioner(s):

- Modified District Findings provided to Petitioner(s) on November 25, 2014, are in blue

Petition Presents an Unsound Educational Program for Pupils to be Enrolled at the Charter School Finding 1.

### Column A. District Finding Statement Verbatim

"The Review Team concludes that while the petitioners" goal is to establish a college preparatory, project-based STEAM (Science, Technology, Engineering, Arts, and Mathematics) middle/high school with blended learning charter school, the petition fails to demonstrate a sound educational program and that it would not adequately serve students requiring special education services and English Learners (EL). The petition lacks sufficient clarity and detail to be considered educationally sound. More specific analyses of the educational program are listed in Finding 3.1, below." "While the Petitioners' goal is to establish a college preparatory, project-based STEAM (Science, Technology, Engineering, Arts, and Mathematics) middle/high school with a blended learning charter school, the petition fails to demonstrate a sound educational program and that is would not adequately serve students requiring special education services and English learners (EL). The petition lacks sufficient clarify and detail to be considered educationally sound. More specific analyses of the educational program are listed in Finding 3.1, below."

### Column B. Clarification/Correction of Finding Assumption

The Lead Petitioner, Dawn Contreras, wrote 2 District English Learner Master Plans (Coalinga-Huron Unified School District, Gateway Community Charters) and implemented those instructional and monitoring plans, in preparation for District Federal Program Monitoring Reviews for ELs. Mrs. Contreras coordinated a Federal Program Monitoring Review-site visit (Visalia Unified School), which resulted in program commendations for serving ELs from the California Department of Education, Mrs. Contreras is trained as a Language Development Specialist, who has provided teacher, staff, and principal/administrator trainings in second language acquisition and instructional service for ELs for over 20 years. Petitioner(s) also include credentialed special education teachers. James Clemmer and Heidi Speiss; former Director of Student Services for Sacramento City Unified School District, Rob Gerig, and licensed School Counselor, Catherine Kaslan.

PCA's original Petition stated PCA would operate as a public school of the SJUSD for the purposes of providing special education and related services under the IDEA, pursuant to Ed. Code Section 47641(b), in accordance with Ed. Code Section 47646 and 20 U.S.C. 1413, as noted on page 111. SJUSD would

### Column C. New Information

The project based STEAM educational model put forth in the Paitlan will serve every student, including ELs and Special Education students. Integrated teaching and learning, through application of individualized hands-on, integrated, and projectbased techniques is best practice for second language acquisition and for teaching students with disabilities. (Hill, 2006; Hadaway, N., Vardell, S. Young, T., 2009; Haynes, J., 2007). All students can achieve high standards. This finding implies a program with less rigor is more suitable for students with disabilities and English learners.

#### (See SJUSD District Data below.)

During the petition review, the District Review Team provided the Petitioner(s) at least 8 questions about special education services. In response, the Petitioner(s) made it clear that pages 111-122 of the Petition addressed plans for Special Education and in their responses dated September 25, 2014, reaffirmed the Charter School Would be a 'School of the District' for Special Education services for the first two years of operations prosument to Ed. Code Section 47641 (b). Question responses to the District Review Team repeatedly stated the Petitioner(s)' desire to work

provide special education services for students enrolled in PCA to the extent required by law. PCA anticipated developing a Memorandum of Understanding (MOU) which would delineate the specific responsibilities and actions of PCA and the District for ensuring Least Restrictive Environment (LRE) and Free and Appropriate Education (FAPE) for all special education students enrolled at PCA. SJUSD would hold ultimate responsibility for providing Special Education services. As outlined on pages 111-122, PCA pledged to work in cooperation with the District to ensure a FAPE in the LRE, described on page 111.

PCA's proposed daily schedule of 8 a.m. - 5 p.m. will provide approximately 2 hours per day of additional instructional time, which translates into 244 annual hours for each student at PCA. This is a significant support for ELs and students with disabilities.

cooperatively with the District to develop a MOU that will ensure FAPE and LRE for students with disabilities. The Petition contains all necessary requirements under the law and is compliant with all aspects of IDEA, pursuand of Ed. Code Section 47641 (b), in accordance with Ed. Code Section 47646 and 20 U.S.C. 1413. The language used in the Petition for special education was reviewed by experts at California Chaper Schools Association (CCSA) and attorneys from coung, Minney & Corr, LLP (Legal Counsel) who confirmed the Petition contained all required language regarding plans for ELs and students with disabilities.

Various staff development activities outlined in the Petition that support the teaching and learning of every student including, ELs and students with disabilities is included on pages 74, 75, 109-110, and 123 of the Petitor

Finding 2. Petitioners are Demonstrably Unlikely to Successfully Implement the Program Set Forth in the Registion

Column A. District Finding Statement Verbatim	Column B. Clarification/Correction of Finding Assumption	Column C. New Information
"The Review Team concludes that the petitioners are unlikely to successfully implement the program presented in the petition because the petitioners' financial plan is flawed and is not found to be reasonably comprehensive for the following reasons:" "The Petitioners are unlikely to successfully implement the program presented in the petition because the Petitioners' financial plan is flawed and is not found to be reasonably comprehensive for the following reasons:"	This conclusion is incorrect due to the following:	This conclusion is incorrect, as it does not reflect the New State Budget Act of 2014 guidelines and LCFF regulations, specifically outlined in Regulation Section 15496.
"Petition indicates that \$200 is to be spent on each new student each year which does not support the proposed instructional plan."	This finding is not correct. Noted costs allocated for new students each year are inaccurate <u>as the Petitioner(s)</u> have allocated \$505 per new student as noted in the Petition Budget. These costs were based on assumptions from CCSA's Budget Experts as well as research from other authorized public charter school budgets, including Gateway International School's (GIS) Budget (authorized by SJUSD). GIS allocated \$170 per student for textbooks and supplies, which is well below PCA's \$505 estimate. With regard to instructional technology, PCA plans to take full advantage of the myriad of free instructional technology/digital software	1A. This finding implies that textbooks are central to the New Standards-CCSS/NGSS. To the contrary, CCS and NGSS explicitly make textbooks an ancillary resource so technology, teacher-designed lessons, and original documents are central to teaching critical-thinking skills of the CCSS.  1B. The Petitioner(s) in glude Tom Montgomery, a Technical Solutions Architect for Cisco Systems, who reviewed and incomplete the control of the contro

"Information is lacking to confirm assumptions made in the petition for LCFF State Revenue and the Federal Child Nutrition Program."

- "Multi-Year projection reflects a strong reserve but, without confirming revenue, the accuracy of this projection cannot be determined."
- conservative \$505 per pupil projection.

  2. This statement is inaccurate. Petitioner(s) provided budgets based on the new Local Control Funding Formula (LCFF) State Revenue process outlined in Senate Bill (SB) 852; Budget Act of 2014; SB 858; and SB 859 for charter schools. The Petitioner(s) followed the new legislative guidelines to establish a base funding

rate for new charter schools, using SJUSD's Second Interim Budget of 2013-14 per pupil funding rate of \$7,293 per Title 5, California Code of Regulations (5)

CCRI Section 15496.

available through online sites such as Edmodo, the

Buck Institute, and Edutopia. Using free instructional

resources, will keep instructional costs below PCA's

3A. The statement that revenue is not confirmed is inaccurate. As stated in answer 2 above, Petitioner(s) used the process outlined in law to determine the per pupil ADA rate and payment schedules as well as including sources of revenue such as PCSGP and the State Revolving Loan. This finding does not acknowledge revenue projections included in the Petitioner(s)\* Multi-Year Projections, specifically the

Federal Public Charter School Grant (PCSGP).

3B. The Petitioner(s) provided financial requirements well-above the standard for charter petitions.

Petitioner(s) provided 3 separate Multi-Year Budget Scenarios, detailing how PCA will achieve startup and operations.

reasonable educational and instructional technology and infrastructure expenditures for the 21st century.

- 2. Petitioner(s provided the CCSA LCFF Calculator and Federal Child Nutrition Program assumptions to the District Review Team in their September 24, 2014 response. These CDE Child and Adult Care Food Program (CACFP parates are as follows: a) Breakfast-Free = \$1.58, Reduced-Price=\$1.28; b) Lunch/Supper-Free=\$2.93, Reduced-Price=\$1.28; b) Lunch/Supper-Free=\$2.93, Reduced-Price=\$2.53. As noted on page 2 of the Budget Natrative, PCA used figures from SJUSD's P-2 20 4 Budget Report to arrive at its Free and Reduced Puesch (FRPL) percentage of 50.82%, which translates \$101.64 Average Daily Attendance (ADA) for FRPL rand 98.36 ADA for Paid Lunches.
- 3A. The Petition of state Petition of the Federal Public Charter Chool Grant (PCSGP) passed State Peer Review of October 22, 2014, confirming the Charter Schools Details and 2015/16-\$200,000) upon Petition approach

for Den

- 3B. Governor wown signed AB 948 into law on September 30, 2014. As of January 1, 2015, the new threshold for SB740 Facility Grant qualification decreased from 70% FRPL to 60%. PCA will apply for these revenues based upon new qualifications, which will add to PCA's strong working capital created by the PCSGP.
- 3C. At the recommendation of the Superintendent, the Petitioner(s) reached out to the San Juan Director of Facilities and Property Management to prepare its Proposition 39 Facility Request, to make wise use of facility dollars. The Director of Facilities and Property Management never responded to the Petitioner's email of October 20, 2014, a third request to conduct a Creekside facility Malkthrough with the PCA Board.
- 3D. Petitioner was also apply for federal <u>E-Rate</u>
  <u>Funding</u>, which was also apply for federal <u>E-Rate</u>
  <u>Funding</u>, which was also period to receive discounted telecommunication previous, Internet access, internal connections, and posic maintenance of internal

- 4. "Cash Flow Statement Projected Revenue Receipt does not alian with any known payment schedules."
- 4. This is an inaccurate finding. Petitioner(s) used the Fiscal Crisis & Management Assistance Team's (FCMAT) payment schedules and cash flow projections from the Budget Explorer (Version 5.1) program, located on the FCMAT online website at: http://fcmat.org/budgetexplorer/. This information was provided to the District Review Team in the Petitioner(s)' response dated September 24, 2014.
- 5. "Cash Flow Projection shows a positive balance each month, but this is not deemed reasonable, as revenue receipts cannot be supported. PCA does not identify potential sources of working capital."
- 5. This finding is incorrect. The Petitioner(s) provided the Federal Public Charter School Grant in their Petition Budget, as working capital.
- 6. "Projected Fund Balance is positive, however, the revenue cannot be confirmed and no source of working capital has been identified to cover any deficits."
- This statement of finding is inaccurate. Other sources of capital are outlined in the PCA Budget, such as the Charter School Revolving Loan (CSRLF). It is not necessary for PCA to apply for any loans, including the CSRLF due to ample working capital via the Federal PCSGP. However, the CSRLF is available, if the Petitioner(s) choose to use it.
- 7. "PCA projects an enrollment increase of 75% for year two which is highly unrealistic. The average annual enrollment increase across District schools and charters is 18% "
- 7. The 75% enrollment increase stated in this finding is misleading. The presented statistic of 75% enrollment increase is realistic in Year Two, since it accounts for adding a single new grade level (10th) and additional classes in grades 6-9. (San Juan USD Example-Cottage Elementary School opened with Grades K-1 only. In Year Two, Cottage had a 50% enrollment increase due to adding Grade 2.1

- connections, adding to its healthy working capital created by the PCSGP.
- FCMAT is a leading financial authority in the state, established pursoant to AB 1200. FCMAT provides auidance to digricts and local education agencies (LEA's) across Chilifornia for financial audits, business and financial management. The District Review Team was provided with FCMAT's Cash Flow Module, a standard payment schedule used by the Petitioner(s) of: July-5.00% Aggust-5.00%, September-9.00%, October-9.00%, November-9.00%, December-9.00%, January-9.00%, Tebruary-9.00%, March-9.00%, April-9.00%, May-9.00%, and June-9.00%.
- 5. Federal PCSGP was confirmed by CDE on October 22, 2014. The Petitioner(s) application passed State Peer Review and All receive \$375,000 for 2014/15 planning (\$200.50\sqrt{9}n 2015/16) upon approval of the Charter Petition
- 6. In addition to the \$375,000 Federal PCSGP award PCA will receive upon Charter approval, PCA has the ability to utilize Beschift's program, established in California Ed. Code sections 41365, 41366.5, 41366.7, and 41367. CSIQF was specifically created to provide low-interest loans of up to \$250,000 to new charter schools for start@p and initial operating capital, PCA will also fundraise to increase additional amounts of working capital.
- 7A. The Petitioner(s) understand parent choice dictates enrollment and future growth. As such, the Petitioner(s) have conducted outreach in Arden Arcade, including collaboration with the Cottage Park/Creekside Neighborhood Association, the Country Club Alliance of Neighborhoods, and charter schools in the region such as the California Montessori Project and Aspire-Alexander Twilight. Based on needs from other public charter schools, PCA's enrollment projections are reasonable and will be continually monitored and adjusted, as foundational data continues to be collected.
- 7B. The example on the next page presents a possible Growth Option of the Charter School:

  6 that by 15 to 19 of the charter School:

		PCA Growth Option A								
		Year	Grade 6	Grade 8 S	Grade 9	Grade 10	Grade 11	Grade 12	TOTAL	% Increase
		1	50	50 0 50	50				200	
		2	75	50 0 50	50	50			250	37.5
		3	75	75 350	50	50	50		350	27.3
		4	75	75 975	50 50 50	50 50 50 50 75 75	50	50	425	21.4
		5	100	75 0750	75 75	50	50	50	475	11.8
		6	100	100 075	75	75	50	50	525	10.5
		7	100	100 0100	75	75	50 50 50 50 75 75	50	575	9.5
		8	100	100 =10	100	75		75	625	8.7
		9	100	100 < 100	100	100	75	75	650	4
		10	100	100 Q00	100	100	100	75	675	3.8
"Based on the above-stated deficiencies and possible ack of understanding of legal budget requirements, he petitioners are demonstrably unlikely to successfully mplement the program set forth in the petition."	This conclusion of findings is incorrect. The Petitioner(s) provided the District Review Team FCMAT standard cash flow schedules, reasonable sources of working capital from the CDE, CCSA, and other approved charter schools, addressed new CCSS/NGSS instructional resources, as well as adhered to the new finance requirements of LCFF.	0	100	Anified School Distri	100	100	100	100	700	3.7

Finding 3. Petition Does Not Contain Reasonably Comprehensive Descriptions of Certain Required Elements and a second seco

Column A. District Finding Statement Verbatim	Column B. Clarification/Correction of Finding Assumption	Column C. New Information
"The Review Team concludes that the PCA petition does not contain reasonably comprehensive descriptions of three of the 16 specific required elements set forth in Education Code section 47605(b) (5); specifically, descriptions of the educational program, measureable pupil outcomes, and measurement of pupil progress towards outcomes." "The petition does not contain reasonably comprehensive descriptions of three of the sixteen specific required elements set forth in Education Code section 47605(b)(5); specifically descriptions of the educational program, measurable pupil outcomes, and measurement of pupil progress towards outcomes."	These conclusions are not based on objective criteria. The items listed, as supports for the finding, are inaccurate and display an apparent lack of understanding of new CCSS/NGSS standards (adopted August 2, 2010 by the State Board of Education) and of the Petition presented for approval.	CCSS and NGS require a shift in thinking. This pedagogical shift appears to have led to confusion and is problematic in these inaccurate findings.
"Description of the Educational Program is not found to be reasonably comprehensive for the following reasons:" "The petition presents an unsound educational program for students to be enrolled in the charter school.	This conclusion is incorrect due to the following:	accs-apr15 Attach Page 20

A. "As stated in Finding 1, the MYP-IB program is listed in the PCA Curriculum Matrix as a course option for grades 6-12. However, the MYP-IB program is designed for middle years, not high schools."

"No timeline or information in the Petition explains how the school will transition to IB over time nor does the budget include costs for IB training or for WASC accreditation."

B. "As stated in Finding 1, the petition does not clearly describe the model to be used to meet the needs of students with special needs who qualify for special education services. Three options are proposed, yet the language is confusing and shows a lack of understanding of how special education programs and funding operate within the District."

"Measureable student outcomes are generally vague and rely primarily on the STAR model which sunsets on June 30, 2014.

A. This statement of finding is not correct. MYP-IB is not listed as a course option for any grade level in the Petition. MYP-IB, is listed in the Curriculum Standards Matrix on page 96. As noted standards matrix, IB standards, may be incorporated with the Common Core State Standards (CCSS) and Partnership for 21st Century Skills (P21) Standards for English, Math, and Social Studies.

This finding is inaccurate as the PCA educational program is NOT an IB (International Baccalaureate) Program. PCA's STEAM program is comprehensively outlined as a college preparatory program with integrated teaching using project based and blending learning methodologies on Petition pages 31-139, PCA has no intention of operating as an IB program or school. PCA will be a STEAM school. Therefore, no IB transition timeline or budget items are necessary. The budget does include \$3,500 in instructional consultants in all three Multi-year Budget Scenarios, for WASC accreditation in Year 1.

B. This finding is incorrect. The Petition's language with reaard to special education is clearly outlined on pages 111-122 and the Petition states in 3 separate areas that PCA will be a "School of the District" for special education services. As stated previously, several state experts in special education and attorneys reviewed the Petition and noted it was strong, clear and meets all legal requirements for special education.

This finding is erroneous. The Petition relies heavily on multiple measures rather than state-mandated tests (such as the STAR model). PCA's multiple assessments, which include formative, summative, and benchmark assessments are detailed in a chart of assessments on Petition pages 135-136. Petition Element B discusses the Measurable Student Outcomes, which is what we expect students at PCA to learn. Element C describes Methods of Assessment for all learners. As an additional assistance, Petitioner(s) included a chart within the Petition, demonstrating how the outcomes and assessments of the program align with the 8 state priorities. This chart of pupil outcomes is listed on pages 125-130, and demonstrates fulfilling requirements, as described in Ed. Code Section 52060 (d), which apply for the grade levels served and the nature of the program operated by PCA. Student achievement and

A. This finding confuses "standards," with a "course". Standards are-what students need to know versus a course, which is-a series of lectures or lessons in a particular subject.

A. This finding suggests a lack of understanding for integrated teaching models, including STEAM, project-based learning and blended learning technologies, which will be utilized in PCA's education model.

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B. PCA had inter led to work collaboratively with SJUSD to draft a morandum of Understanding (MOU), which would specify special education services provided by the District and those provided by the Charter School. This information was repeatedly provided to the District Review Team in its September 25, 2014 responses.

The Petition relies on the use of the new CAASP models on pages 109, 124, and 132, rather than the outdated STAR model. Page 124 of the Petition notes that PCA's measurable student outcomes were developed in relation to the current Assembly Bill (AB) 484, which took effect January 1, 2014. The California Assessment System of Student Performance and Progress (CAASPP) was defined and outlined in AB484 and was used in the formulation of PCA's measurable outcomes and goals.

The STAR testing modects not described anywhere in the PCA Petition Page 21 of 2

C. "Petition does not address how students with special needs will access the core curriculum, and there are no references to any type of special education program or to the full continuum and program options: RSP, DIS, SDC, NPS, etc., nor how transportation will be provided in order to access special education services."

performance goals are outlined on pages 125-130, describing the measurable Schoolwide and subgroup outcome goals as defined in the newly adopted Assembly Bill (AB) 484, Ed. Code 52060 (d) and Ed. Code Section 47607. Taken in its entirety, Elements B, Elements C and the included charts together fulfill the required descriptions.

C. This finding is not correct. Petitioner(s) described all necessary special education program requirements for charter petitions and explained on pages 110-122 that the MOU between PCA and the District would incorporate School and District arrangements to serve special education students in an independent charter school, with PCA as a "school of the district."

C1. PCA reiter ted 8 times that it would operate as a "School of the District" for Special Education Services in its September 23, 2014 response to the District Review Team. Bristincludes arrangements, per Ed. Code and IDEX By RSP, DIS, SFC, NPS, etc.

C2. Petitioner spindlude several career educators with decades of experimental decades and programs, including Petitioner(s) named in Finding 1 response above as well as Dr. Sharing October-Retired Superintendent, Fairfield-Suisun and Visalia USD, who also served as Deputy Superintendent and Assistant Superintendent decades and Instruction at Pomona USD. Sherts currently Senior Program Associate at Westerd, where she also works with the California Department of Education, providing district support for all soldent subgroups and populations.

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"Few solid targets for acceptable levels of outcomes are described other than for attendance and references to performing 'better than the district average."

D. "No interventions are identified or described for students with special education needs, EL students, or students who are unable to meet the proposed graduation requirements, especially in the area of mathematics."

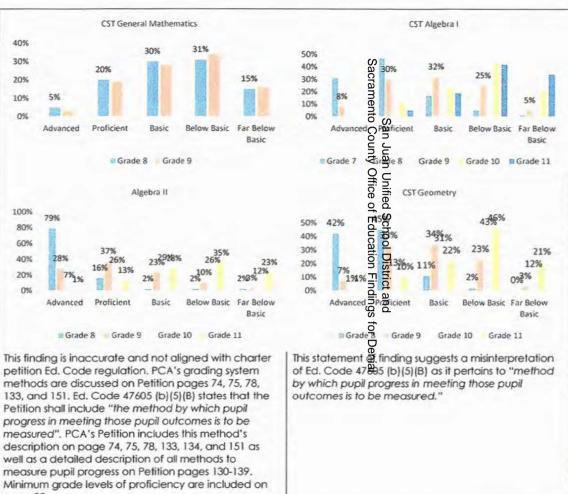
This finding is not accurate and is refuted in 3B response above.

D1. This finding is inaccurate. Comprehensive interventions are described throughout the Petition, including PCA's Student Success Team, Interdisciplinary Teams, and Network of Student Support, described on pages 104-107 and in Petition Appendices.

D2. Mathematics has long been a gatekeeper for college entry and preparation.

SJUSD's 2012/13 California Standards Test (CST)-Mathematics Scores [BELOW AND RIGHT] support the need for PCA, a STEM/STEAM program that utilizes integrated teaching of Mathematics and Science: D1. The Petition outlines all legal procedures for Student Success Team processes on pages 106-107 and Petition Appendices. These are from SB65's California Dropout Prevention Network/CDE publication, detailed in the September 25, 2014 response to the District Review Team. Richard DuFour's intervention processes are also included within these Petition pages from his works such as Professional Learning Communities at Work: Best Practices for Enhancing Student Achievement and Intervention or Special Education? by Richard DuFour in Education Week, Feb. 9, 2011 (Vol. 30, #20, p. C11).

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"Required grading policy and minimum skill levels were not included."

E. "There is a description of Specially Designed Academic Instruction in English (SDAIE) strategies; however a lack of detail regarding intervention support makes it unlikely that intervention can be successfully implemented." page 82.

E. This statement of finding is inaccurate. EL program elements, including intervention and support are explained on pages 108-111.

E1. EL Petition elements are fully detailed and contain all required EL elements. State EL experts reviewed these elements and concur, EL instructional delivery is included in an EL Mañer Plan, not as part of a charter petition.

E2. The Annents of Education's, COI is explained in detail throughout East 106, 131, 134, 136, 137, 138, and 151 and outlines low instructional and

F. "Petition provides insufficient descriptions about the implementation of Common Core State Standards and ELD Standards."

- G. "Petition presents information about the initial identification of EL students using the CELDT test. However, there is no elaboration on how the CELDT results will be used to inform the instructional program.
- F1. This finding is not correct. New mandates provided within the CCSS, ELD and NGSS Standards call for integrated teaching and learning. As mentioned previously, pages 31-139 of the Petition provide detailed descriptions of how CCSS, NGSS, and ELD will be delivered in an integrated approach.
- F2. As a STEM/STEAM college preparatory model, PCA will use integrated teaching, including project-based learning, blended learning, and other differentiated approaches, advocated for teaching the New Standards.
- G. This finding is inaccurate. The Petition fully explains how the CELDT test will be utilized for reclassification and placement on pages 108-111. The Petition also repeatedly discusses the on-going COI process on pages 106, 131, 134, 136, 137, 138, and 151, which is used for all student achievement data. Examples were also provided in the Petition Appendices.

San Juan USD's 3-Year Adequate Yearly Progress Data illustrates the great need for PCA's project based integrated STEM/STEAM program, particularly for <u>EL and Students with Disabilities' Subgroups</u>. [BELOW AND RIGHT]:

achievement data will be analyzed and used to drive classroom teaching and instructional placements, including delivery of English Language Development (ELD). Examples were also provided in the Petition Appendices.

F1. The New CBSS, NGSS, and ELD standards are NOT textbook drivers The new standards promote a pedagogy of teaching and learning that is INTEGRATED and INVILLI-MODAL.

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F2. "Integrate" Exercise renced and cited 31 times in the New CCSS and 33 times in the NGSS. [CCSS-Adopted by the State Bograph Education (SBE), August, 2010; NGSS Adopted by WBE September, 2013.]

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- G1. This finding suggests confusion about what belongs in a charter petition versus what is included within the legal shandates of an English Learner Master Plan.
- G2. The Annenderg Foundation's, COI is explained in detail throughout pages 106, 131, 134, 136, 137, and 151 and outline how all instructional and achievement and a will be analyzed and used to drive classroom teaching and instructional placements. Examples were also provided in the Petition Appendices.

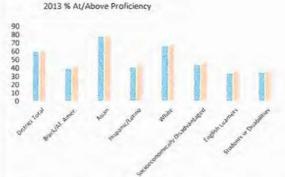
San Juan USD's 3-Year Adequate Yearly Progress Data:

> accs-apr15item09 Attachment 7 Page 24 of 259

placement."

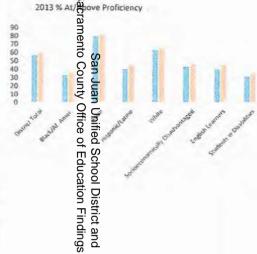
SJUSD Adequate Yearly Progress English Language Arts

2011 % At/Above Proficiency 2012 % At/Above Proficiency



SJUSD Adequate Yearly Progress Mathematics

2011 % At/Above Proficiency 2012 % At/Above Proficiency



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Denial

"Based upon the above listed deficiencies, the petition does not contain a reasonably comprehensive description of the Educational Program."

- 2. "Description of Measurable Pupil Outcomes is not found to be reasonably comprehensive for the following reason:" "Petitioners are demonstrably unlikely to successfully implement the program set forth in the petition."
- A. "Petition does not consistently indicate specific goals for each measurable outcome rather merely states that the measurable outcomes for PCA will be above or higher than similar District schools. No annual goals identify expected increase in students' performance rates and therefore growth expectations cannot be measured. Therefore critical program analysis and changes to instructional practices based upon student needs and performance cannot be made."

This conclusion is incorrect. The Petition does not contain deficiencies. It contains a comprehensive description that meets all requirements of the law for students with disabilities. This inaccurate finding is refuted in the analysis presented above.

This conclusion is not accurate due to the following:

A1. This finding is incorrect. Petition Element B discusses the Measurable Student Outcomes, which is what we expect students at PCA to learn. Element C describes Methods of Assessment for all learners. As an additional assistance. Petitioner(s) included a chart within the Petition, demonstrating how the outcomes and assessments of the program align with the 8 state priorities. This chart of Pupil outcomes is listed on pages 125-130, and demonstrates fulfilling requirements, as described in Ed. Code Section 52060 (d), which apply for the grade levels served and the nature of the program operated by PCA. Student achievement and performance goals are outlined on pages 125-127 and 130, describing the measurable Schoolwide and subgroup outcome goals as defined in the newly adopted Assembly Bill (AB) 484, Ed. Code 52060 (d) and Ed. Code Section 47607. Taken in its entirety,

A1. During a phone call on October 1, 2014, at 3:48 p.m., the District Review Team solicited, "any other changes or amendments that you want to make or some way you want to modify" the document, "you can submit in the next 1 to 2 weeks." The Petitioner(s) were responsive, providing more specific measurable goals to the District Review Team on the morning of October 14, 2014. However, these clarifying edits were not accepted. According to District Staff, they did not "want to confuse the District Review Team," as stated in a 1 p.m. phone conference on October 14, 2014. A2. The findings are inaccurate regarding charter school finance, new OCSS, NGSS, ELD standards implementation as well as best practices in differentiation. Steppelion, and analysis and use of assessment data.

Flements B. Flements C and the included charts together fulfill the required descriptions. This finding is not correct and was refuted in responses "Proposed budget/cash flow for the first three years is San Juan Unified Schoo Sacramento County Office of Educa to Findings 2.1-2.7 herein above. of concern." "Expenses do not appear reasonable for equipment This statement of findings is not correct and was and books for the start up." refuted in the response to Finding 2.1 herein above. "Student enrollment and projected growth in ADA This finding is inaccurate and was refuted in response seems significantly higher than appears to be to Finding 2.7 herein above. reasonable." "Projected enrollment numbers are not consistent This finding is not correct. Enrollment numbers in the Petition are consistent throughout on pages 49, 199, throughout the Petition" and 200, where enrollment figures are specifically cited. Petitioner(s) submitted a Proposition 39 Facility This statement is erroneous, 9 members of PCA's "Petilion failed to provide any evidence of parental Development Team are themselves, parents Request to the Superintendent of SJUSD on October ".hoggguz 31, 2014 with additional Intent to Enroll forms collected meaningfully interested in having their children attend PCA, who are supporters and active participants in the from additional parents meaningfully interested in having their children attend PCA. The Petitioner(s) crafting of the Charter program and Petition. These parent team members are noted on Petition pages 13continue to collect Intent to Enroll Forms from 28. Petitioner(s) also note on page 51 of the Petition interested paress. that 244 parents signed the Parent Petition Signature Petitioner(s) corumnue to gather Petition parental Pages. Those signature pages are provided in support as evidenced in the recent letter of support Appendix C. submitted by the Cottage Park/Creekside Neighborhood Association. Services for EL's will be further delineated in an EL Master Plan as noted herein Finding Responses 3.1E, 3.1F, and 3.1G above. This statement is not correct. The Petition contains data "No data was submitted on the current success of the of target students on pages 28-30. Student target student group or availability of services." assessments, as provided on pages 135-136 and use of these assessments to determine services, are described on Petition pages 134-138. Specified services through IEP and Section 504 Plans are discussed on Petition pages 111-123. accs-apr15item09 Attachment 7 Page 26 of 259 "Based upon the above deficiency, the petition does There are no deficiencies in the Petition per Ed. Code 47605. These findings include misrepresentations and not contain a reasonably comprehensive description of the Measurable Pupil Outcomes identified for use by do not recognize particular elements presented in the the charter school." PCA Petition.

3. "Description of Methods to Assess Pupil Progress towards Outcomes is not found to be reasonably comprehensive for the following reason:"

"The Petition does not contain reasonably comprehensive descriptions of certain required elements.

"Falls to provide a comprehensive description of its educational program."

"Fails to provide a comprehensive description of its student outcomes specific to its projected subgroups and on a school-wide basis."

Fails to provide comprehensive description of its budget and the Human Resource personnel requirements of a charter school.

"As stated in Finding 1, the petition does not clearly describe the model to be used to meet the needs of students with special needs who qualify for special education services. Three options are proposed, yet the language is confusing and shows a lack of understanding of how special education programs and funding operate within the District.

"Petition does not address how students with special needs will access the core curriculum, there are no references to any type of special education program or to the full continuum and program options such as RSP, DIS, SCD, NPS, etc., nor how transportation will be provided in order to access special education services."

"While there is a description of Specialty Designed Academic Instruction in English (SDAIE) strategies, a lack of detail regarding intervention support makes it This conclusion is not correct due to the following:

This finding is not correct and is refuted throughout the responses to Findings 1, 2, and 3 included herein.

This conclusion is inaccurate. The Petition provides a full and comprehensive description of its education program on pages 31-139 and meets all requirements for charter petitions as set forth by Ed. Code 47605.

This finding is incorrect and is refuted in responses to Finding 3.2 herein above.

This finding is inaccurate as the Petitioner(s) provided financial requirements well-above the standard for charter petitions. Petitioner(s) provided 3 separate Multi-Year Budget Scenarios, detailing how PCA will achieve startup and operations as well as a detailed Budget Narrative and 9 Cash Flow Reports, detailing each of the 3 Budget Scenarios for 3 years. The Petition includes all Human Resource Personnel elements required by Ed. Code 47605. These Human Resource personnel Elements 5, 6, 11, 12, 13, and 15 are fully detailed on Petition pages 144-164, 192-193, and 195.

This finding is inaccurate and is refuted in responses to Findings 1, 3.1B, 3.1C, and 3.1D herein above.

This finding is inaccurate and is refuted in responses to Findings 1, 3.1B, 3.1C, and 3.1D herein above.

This finding is not correct and is refuted in response to Finding 3.1E herein above.

This statement of finding suggests a lack of clear understanding for what constitutes required inclusion in a charter pegation as outlined in Ed. Code 47605.

an Unified So ty Office of Eo

Sacrame

This finding der to a misunderstanding of the Human Resource elements outlined in Ed. Code 47605 and those that confitte required inclusion in a charter petition.

trict and Findings for Denial

accs-apr15item09 Attachment 7 Page 27 of 259 unlikely that interventions can be successfully implemented."

"Petition provides insufficient descriptions about the implementation of the Common Core State Standards and FID standards."

"Petition presents information about the initial identification of EL students using the CELDT test; however, there is no elaboration on how the CELDT results will be used to inform the instructional program placement."

"Based upon the above listed deficiencles, the petition does not contain a reasonably comprehensive description of the Educational Program."

A. "Petition lacks sufficient detail on how outcomes will be measured, at what frequency and, more importantly, how the resulting data will be used in a clear manner to inform teachers and parents about student progress. Without this detail, the impact of student performance on classroom instruction and the overall program quality cannot be determined."

"Description of Measurable Pupil Outcomes is not found to be reasonably comprehensive for the following reason:" Petition does not consistently indicate specific goals for each measurable outcome but rather merely states that the measurable outcomes for PCA will be above or higher than similar District schools. No annual goals identify expected increase in students' performance rates and therefore growth expectations cannot be measured. As a result, critical program analysis and changes to instructional practices based upon student needs and performance cannot be made.

"Based upon the above deficiency, the petition does not contain a reasonably comprehensive description of the Measurement of the methods to assess Pupil Progress towards outcomes." "Based upon the above deficiency, the petition does not contain a reasonably comprehensive description of the Measurable Pupil Outcomes identified for use by the charter school."

This finding is not correct and is refuted in response to Finding 3.1F herein above.

This finding is inaccurate as this EL information is elaborated on in an English Learner Master Plan rather than a charter petition as refuted in response to Finding 3.1G herein above.

This finding is incorrect. The Petition does not contain deficiencies. It contains a comprehensive description that meets all requirements of charter law. This inaccurate finding is refuted in the analysis presented above.

A. This finding is not accurate. The Petition provides a comprehensive description of the six assessment types that will be used including diagnostic, formative, summative, norm-referenced, criterion-referenced, and interim/benchmark, as well as the frequency with which these measures will be administered on pages 130-139 of the Petition.

This finding is not correct and is refuted in responses to Finding 2.A and 3.3 herein above.

This Petition finding is not correct. The Petition is not deficient, rather it presents a comprehensive description of methods to assess Pupil Progress towards outcomes as discussed and presented on pages 130-139 of the Petition and elaborated upon in the responses to findings herein.

Sacramento County Office of Educace of Educa outside provider (as stated on Petition page 132), Northwest Evaluation Association (NWEA), and have made arrangements to use Measures of Academic Performance (AA) summative semester benchmark testing for PCA Quing its initial years of operation. Upon authorization, PCA will finalize this preliminary agreement with Raymond Mitchell, NWEA consultant, as a contract with NWEA for summative benchmarks and accompagying staff professional development for summative and formative assessment

Note: Board Policy 0420.4, approved by SJUSD Board of Education on February 22, 2014 states, "The Board shall ensure that any approved charter contains adequate processes and measures for holding the school accountable for fulfilling the terms of its charter. These shall include, but not be limited to, fiscal accountability systems, multiple measures for evaluating the educational program, and regular reports to the Board." [Outdated Policies for charter schools are currently displayed on the Gamut online as of 11/3/14. Currently the following site: http://gamutonline.net/DisplayPolicy/177790/is displaying the outdand 2006 policies, not charter school policies approped by SJUSD's Board of Education on Face 22, 2014.]

Education on Face 28 of 259

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MAILING: P.O. Box 269003, Sacramento, CA 95826-9003 PHYSICAL LOCATION: 10474 Mather Boulevard, Mather, CA

(916) 228-2500 · www.scoe.net

David W. Gordon Superintendent February 10, 2015

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Via Email

Dawn Contreras Douglas, Lead Petitioner Paramount Collegiate Academy 3510 Hazeltine Lane Roseville, CA 95747

Re: Paramount Collegiate Academy Charter School Petition Appeal

Dear Ms. Contreras Douglas:

We attach a copy of the Sacramento County Board of Education's agenda item for the Paramount Collegiate Academy's charter petition appeal. The item contains the Sacramento County Office of Education's Recommended Findings of Fact. The Paramount Collegiate Academy charter petition is included as a separate enclosure to the agenda item. The full agenda item is accessible at www.scoe.net/board/index.html starting on page 20.

The Sacramento County Board of Education has received a copy of the agenda item, and will consider your charter appeal at its hearing on Tuesday, February 17, 2015 at 6:30 p.m. or thereafter. This Board meeting will take place at the Sacramento County Office of Education, Board Room, at 10474 Mather Boulevard, Mather, CA. As Petitioner, you will be provided 15 minutes to present your petition and respond to questions from the Board.

If you have questions, please contact me at (916) 228-2652.

Sincerely,

Teresa Stinson General Counsel

TS:mr

Attachment

cc: Kent Kern, Superintendent, San Juan Unified School District Linda C.T. Simlick, General Counsel, San Juan Unified School District



### SACRAMENTO COUNTY BOARD OF EDUCATION

10474 Mather Boulevard, P.O. Box 269003 Sacramento, CA 95826-9003

Subject:	Appeal of San Juan Unified School District's Denial of the	Agenda Item No.:	VIII.D.
	Paramount Collegiate Academy Charter School Petition	Enclosures:	63 plus a Separate Enclosure
Reason:	Public Hearing, Discussion, and Action on Appeal of San	From:	David W. Gordon
	Juan Unified School District's Denial of the Charter School	Prepared By:	Teresa Stinson
	Petition	<b>Board Meeting Date:</b>	02/17/15

### BACKGROUND:

The San Juan Unified School District (SJUSD) denied the Paramount Collegiate Academy petition on November 18, 2014. Paramount Collegiate Academy (Petitioner) submitted its completed charter petition appeal to the Sacramento County Board of Education (County Board) on December 19, 2014.

### County Board Review of Charter Petition

Paramount Collegiate Academy seeks to operate a charter school in SJUSD serving 6th through 12th grade (6-12) students. The intention is to offer a college preparatory, project-based Science, Technology, Engineering, Arts, and Mathematics (STEAM) middle/high school with blended learning. The petition envisions enrolling 200 students in grades 6-9 in its first year of operation. At full capacity, Petitioner expects to serve 875 students in grades 6-12, with a student population representative of the general population residing in SJUSD.

The enclosed Sacramento County Office of Education (SCOE) Recommended Findings of Fact includes a detailed analysis of the charter petition. In summary, a county board of education may not deny a charter appeal unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the findings set forth in Education Code section 47605(b)(1) through (5). While all of the legal elements are important, three elements are the most substantive when considering approval or denial of a charter school petition:

- 1. Does the petition present a **sound educational program** for the pupils to be enrolled in the charter school?
- 2. Does the petition demonstrate the petitioners' **ability to successfully implement** the program presented in the petition?

 Does the petition contain reasonably comprehensive descriptions of all of the 16 required elements provided in Education Code section 47605(b)(5)(A) through (P)?

The SCOE analysis concludes that:

- · Petitioner's financial and operational plan is not realistic;
- The petition does not present a sound educational program for students requiring special education services and English learners;
- The petition does not contain reasonably comprehensive descriptions of certain elements required by Education Code section 47605(b)(5), specifically, the educational program and measurable pupil outcomes; and
- Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition.

### SUPERINTENDENT'S RECOMMENDATION:

The Superintendent recommends that the County Board adopt the Sacramento County Office of Education's Recommended Findings of Fact and deny the Paramount Collegiate Academy's charter school appeal, as the submitted petition does not meet legal requirements.

### SACRAMENTO COUNTY BOARD OF EDUCATION

10474 Mather Boulevard, P.O. Box 269003 Sacramento, CA 95826-9003 916.228.2410

### \*\*PLEASE POST\*\*

### NOTICE OF PUBLIC HEARING

A public hearing will be held by the Sacramento County Board of Education (Board) to receive public testimony and input from the community regarding the Paramount Collegiate Academy charter petition appeal. (The San Juan Unified School District denied the charter petition on November 18, 2014.) At the conclusion of the public hearing, the Board is expected to take action on the Paramount Collegiate Academy charter petition appeal.

The public hearing is scheduled as follows:

DATE	TIME	LOCATION
Tuesday, February 17, 2015	6:30 p.m. or thereafter	Sacramento County Office of Education David P. Meaney Education Center Board Room 10474 Mather Boulevard, Mather, CA

Individuals wishing to speak before the Board are requested to fill out a speaker card, which will be available in the Board Room. Completed speaker cards need to be submitted to the Board Recording Secretary; speakers will be called in the order in which the cards are received. Each individual addressing the Board will have a maximum of two minutes to speak to ensure that all who wish to address the Board on this matter will be heard.

Materials subject to the public hearing will be available at the public hearing. If you would like a copy of the materials prior to that time, contact the Sacramento County Office of Education at 10474 Mather Boulevard, Mather, CA 95655 or P.O. Box 269003, Sacramento, CA 95826-9003 or call 916.228.2410.

### **EXECUTIVE SUMMARY**

SCOE staff reviewed the Paramount Collegiate Academy's (Petitioner) charter petition appeal under California law, Board Policy, and Administrative Rules and Regulations, and recommends that the Board deny the petition.

### Background; Introduction and Standard of Review (Page VIII.D.6.)

### I. Technical Requirements (Page VIII.D.7.)

Petitioner submitted sufficient parent and teacher signatures and the documents required to begin the charter petition review process.

### II. Financial and Operational Analysis (Pages VIII.D.7. - VIII.D.14.)

Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition because Petitioner's financial and operational plan is not realistic. The budget does not adequately budget for special education, facilities, and other costs. Suggested budget revisions would result in shortfalls of least \$466,492 in Year One, \$649,097 in Year Two, and \$528,437 in Year Three. These shortfalls will increase significantly if the charter does not begin each school year with 96% attendance and Petitioner's projected enrollment of 200, 350, and 525 students in its first three years.

### III. Program Analysis (Pages VIII.D.14. – VIII.D.25.)

The petition does not present a sound educational program for students requiring special education services and English learners. For general education students, the petition describes a research-based educational program. However, given the broad scope of intended educational practices and the lack of a detailed plan or timeline to accomplish the numerous expectations, it is unlikely that Petitioner can successfully implement all of its intended practices. Moreover, the petition's lack of adequate measurable pupil outcomes will prevent a full assessment of whether Petitioner's educational objectives are successfully met.

### CONCLUSION

SCOE staff recommends that the Paramount Collegiate Academy's charter petition be denied on the grounds that the financial and operation plan is unsound and Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition. In addition, the petition does not present a sound educational program for students requiring special education services and English learners; and does not contain reasonably comprehensive descriptions of certain elements required by Education Code section 47605(b)(5) (educational program and measurable pupil outcomes).

### Recommended Findings of Fact Table of Contents

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### Sacramento County Office of Education Recommended Findings of Fact Paramount Collegiate Academy Charter School Petition

### BACKGROUND

Paramount Collegiate Academy (Petitioner) seeks to operate a charter school in the San Juan Unified School District (SJUSD) serving 6th through 12th grade students. The intention is to offer a college preparatory, project-based Science, Technology, Engineering, Arts, and Mathematics (STEAM) middle/high school with blended learning. The petition envisions enrolling 200 students in grades 6-9 in its first year of operation, with one grade added each successive year through grade 12 in year four. At full capacity, Petitioner expects to serve 875 students in grades 6-12, with a student population representative of the general population of SJUSD.

Petitioner has submitted signatures of parents/legal guardians who affirm that they are meaningfully interested in having their children attend the charter school, which is equivalent to at least one-half the number of pupils that Petitioner estimates will enroll in the school during the first year of operation. (There are 179 parent/guardian signatures of students expected to be in grades 6-9 in 2015-2016.) Petitioner has also submitted the signatures of nine teachers who affirm they are meaningfully interested in "employment with Paramount Collegiate Academy."

On November 18, 2014, the SJUSD governing board denied the Paramount Collegiate Academy charter petition on the grounds that: (1) the petition presents an unsound educational program and would not adequately serve students requiring special education services and English learners; (2) Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition because the financial plan is flawed and not reasonably comprehensive; and (3) the petition does not contain a reasonably comprehensive description of certain required elements, including the description of the educational program, measurable pupil outcomes, and measurement of pupil progress toward outcomes.

Petitioner submitted appeal documents to the Sacramento County Office of Education (SCOE) on December 17, 2014 and completed its appeal on December 19, 2014. If the Sacramento County Board of Education (County Board) denies the appeal, Paramount Collegiate Academy may appeal the decision to the State Board of Education.

### INTRODUCTION AND STANDARD OF REVIEW

A county board of education may not deny a charter appeal unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the following findings set forth in Education Code section 47605(b)(1) through (5):

- (1) The charter school presents an *unsound educational program* for the pupils to be enrolled in the charter school.
- (2) The petitioner is demonstrably *unlikely to successfully implement* the program set forth in the petition.

- (3) The petition does not contain the *number of signatures* required by subdivision (a).
- (4) The petition does not contain an affirmation of each of the conditions described in subdivision (d) [e.g., nonsectarian; admit all students; use of public random lottery, if needed, for admission].
- (5) The petition does not contain reasonably comprehensive descriptions of all of the 16 elements listed in Education Code section 47605(b)(5)(A) through (P).

Based upon analysis of the petition, SCOE staff recommend that the charter appeal be denied on the grounds that:

- · Petitioner's financial and operational plan is not realistic;
- The petition does not present a sound educational program for students requiring special education services and English learners;
- The petition does not contain reasonably comprehensive descriptions of certain elements required by Education Code section 47605(b)(5), specifically, the educational program and measurable pupil outcomes; and
- Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition.

### ANALYSIS OF PETITION AND RECOMMENDED FINDINGS OF FACT

This analysis will review each area specified in Education Code section 47605, the applicable requirements of Title 5 of the California Code of Regulations sections 11967 and 11967.5.1, and County Board Policy and Administrative Rules and Regulations on Charter School Petitions (BP 2400 and ARR 2400). These sections are enclosed for convenient reference. Copies of BP 2400 and ARR 2400 were provided to Petitioner.

### I. TECHNICAL REQUIREMENTS

The petition is well organized. As required, Paramount Collegiate Academy has provided a copy of the charter petition as denied by the school district, a copy of the school district governing board's action of denial of the petition, the factual findings specific to the petition, a revised petition that includes changes that Petitioner believes are necessary to reflect the County Board as the chartering entity, and a certification of compliance with applicable law.

### II. FINANCIAL AND OPERATIONAL ANALYSIS

Under Education Code section 47605(b)(2), the County Board may deny a charter appeal if Petitioner is "demonstrably unlikely to successfully implement the program set forth in the petition." One of the most crucial elements in assuring that the charter school program can be successfully implemented, along with competent staff, is a realistic financial and operational plan. (5 Cal. Code Regs., § 11967.5.1(c)(3).)

A charter petition's financial and operational plan is not realistic when it does not adequately: (1) include reasonable estimates of all anticipated revenues and expenditures necessary to operate the school, including special education;

(2) present a budget that in its totality appears viable and, over a period of no less than two years of operation, provides for the amassing of a reserve equivalent to that required by law for a school district of similar size; (3) demonstrate the necessary background or understanding of school finance and business management critical to the charter school's success, or a plan to secure the services of individuals with the necessary background; or (4) reflect reasonable costs for the acquisition or leasing of facilities, taking into account the facilities the charter may be allocated under Education Code section 47614. (5 Cal. Code Regs., § 11967.5.1(c)(3)(B), (c)(3)(D), (c)(4).)

#### A. FINANCIAL ANALYSIS

In general, the budget assumptions were well thought out and in many cases, conservative. However, there were many areas where a clear understanding of school financing was lacking, which required that SCOE make large adjustments to the budget. Because the adjustments went in both directions, sometimes helping and sometimes hurting the bottom line, a complete budget summary is included at the end of this analysis. In short, necessary budget revisions result in negative fund balances in the first three years of operation of at least:

2015/16	2016/17	2017/18		
(\$466,492)	(\$649,097)	(\$528,437)		

More problematic, these shortfalls will grow if the charter does not begin with 200 students enrolled on the first day of school who attend 96% of the time in Year One. Petitioner's budget is based upon very aggressive growth schedules of 350 students enrolled in Year Two and 525 students enrolled in Year Three. The above shortfalls would increase significantly should Petitioner not begin each year with the projected attendance.

Adjustments to Petitioner's budget are as follows:

 Revenues included a line item for Transfer of Charter Schools in Lieu of Property Taxes. First, a county office would not make a property tax transfer. Second, if SJUSD had approved this charter, this revenue was not applied properly to the Local Control Funding Formula (LCFF) entitlement.

In either scenario, there is no additional money for a property tax transfer. For every dollar received in property taxes, a dollar is deducted from the state, making the net impact \$0. Therefore, revenue is overestimated as follows:

- Year One \$155,520
- Year Two \$272,160
- Year Three \$408,240
- 2. The Federal Revenue includes start-up grants for \$225,000 in the current year, \$200,000 in 2015/16, and \$150,000 in 2016/17. These start-up grants are one per CDS code and the charter would not be eligible for all three.

- SCOE therefore needed to adjust revenue to remove the \$200,000 and \$150,000 grants.
- 3. The charter would not be eligible for Federal Title 1, 2, and 3 funding until the second year, based on the prior pupil counts. Revenue would need to be reduced as follows:
  - Year One \$48,882
  - Year Two \$36,892
  - Year Three \$42,657
- 4. Federal Special Education Entitlement was included in 2016/17 and 2017/18. Petitioner properly assumed that the federal funding would be delayed for a year and did not include revenue in 2015/16. Petitioner used 2016/17 and 2017/18 pupil counts in their estimates. The federal funding is a year behind and it uses the previous year pupil counts. Therefore, funding would need to be reduced by \$19,550 in 2016/17 and \$22,825 in 2017/18.
- 5. A mathematical error was made in the calculation of support salaries in 2016/17 and 2017/18. Page 4 of the budget assumptions has the Coordinator of Data Systems at \$65,000 and the Coordinator of Technology at \$55,000 (or \$27,500 for ½ of an FTE). The Coordinator of Data Systems does not start until 2016/17. It appears that the budget calculates the Coordinator of Data Systems at \$55,000 instead of \$65,000. SCOE adjusted the expenditure to correct the error in 2016/17 by \$10,000 and \$10,200 in 2017/18 using Petitioner's method of applying a 2% increase.
- Pages 126-130 of the petition discuss duties of a site Testing Coordinator and a Chief Accountability Officer that are not included in the budget. Assuming both are part-time, an approximate salary and benefit would increase expenditures by \$60,000 for each of the three years.
- 7. A mathematical error was made in totaling costs in the 4000 object codes in 2015/16, 2016/17, and 2017/18. This error overestimates expenditures. SCOE therefore reduced expenditures as follows:
  - Year One \$5,500
  - Year Two \$12,000
  - Year Three \$12,000
- 8. In the correspondence between SJUSD and Paramount Collegiate Academy dated September 24, 2014, #44, the petition describes the lunch program revenue as 101.65 ADA for Free/Reduced lunches and 98.36 Paid lunches. With the assumption of serving 200 lunches per day in Year One, the revenue Petitioner projects is reasonable. However, as Petitioner did not include expenditures for all 200 lunches, the expenditures would need to increase as follows:

- Year One \$37,000
- Year Two \$75,000
- Year Three \$123,000
- 9. As a member of an outside Special Education Local Plan Area (SELPA), the charter would be responsible for 100% of their special education costs. While Petitioner did budget for a Resource Teacher and for special education services in contracting, they did not budget enough to cover even the least expensive services. Special education expenditures would need to increase as follows:
  - Year One \$204,000
  - Year Two \$417,000
  - Year Three \$674,000

This is a minimum. If the charter received just one student who needed more intense services, the cost would increase significantly.

- 10. Petitioner has included multiple budget scenarios depending on the possible facility options. As they have not yet acquired a facility from SJUSD and SJUSD would only be required to provide a Proposition 39 facility to accommodate Petitioner's projected in-district average daily attendance of 90.7, SCOE is making the assumption they will rent a facility (Petitioner's Budget Scenario #2). The amount included in the budget for rental of a facility is reasonable. However, it does not include Tenant Improvements (TI) on a facility. Assuming a very inexpensive TI with very flexible lease arrangements that allow for lease expansion only as space is needed, SCOE estimates the additional costs would be a minimum increase to expenditures of the following¹:
  - Year One \$210,000
  - Year Two \$157,500
  - Year Three \$183,750

<sup>&</sup>lt;sup>1</sup> Facilities are further discussed in section II.C. below.

Based on the items discussed above, at a minimum, the budget should be adjusted as follows:

#### Paramount Collegiate Academy (PCA) Budget Scenario #2 used as starting point

Revenue				
(Per PCA Scenario #2)	Start-up	2015/16	2016/17	2017/18
LCFF		1,424,808	2,551,571	3,923,578
Property Taxes		155,520	272,160	408,240
Federal Revenue	225,000	389,576	544,819	611,384
State Revenue		115,296	208,019	312,028
Revenue Per Petition	225,000	2,085,200	3,576,569	5,255,230
Adjustments				
Property Taxes (#1)		(155,520)	(272,160)	(408,240)
Start-up Grant (#2)		(200,000)	(150,000)	
Title 1, 2, 3 (#3) Federal Special Ed		(48,882)	(36,892)	(42,657)
(#4)			(19,550)	(22,825)
Adjusted Revenue	225,000	1,680,798	3.097,967	4,781,508
Expenditures (Per PCA Scenario #2)				
Certificated Salaries	50,000	636,900	936,054	1,308,615
Classified Salaries		152,500	210,550	214,761
Benefits	7,088	234,204	395,009	590,782
Books and Supplies	127,040	211,198	354,893	546,917
Services		408,737	619,604	890,141
Capital Outlay	24,875		31,446	31,446
Oversight Fee Expenditures Per		14,248	25,516	39,236
Petition	209,003	1,657,787	2,573,072	3,621,898

Net Income Fund Balance	15,997 15,997	(482,489) (466,492)	(182,605) (649,097)	120,660 (528,437)
TI (#10) Adjusted Expenditures	209,003	210,000 2,163,287	157,500 3,280,572	183,750 4,660,848
Special Ed (#9)		204,000	417,000	674,000
Lunches (#8)		37,000	75,000	123,000
Math Error (#7)		(5,500)	(12,000)	(12,000)
Correction (#5) Testing Coordinator/ CAO (#6)		60,000	10,000	10,200 60,000
Adjustments Coordinator				

# - indicates the narrative item that corresponds to the adjustment

As noted above, these estimated shortfalls will increase significantly if the charter does not begin each school year with Petitioner's projected enrollment figures and 96% attendance.

#### **B. ADMINISTRATIVE PLAN**

The petition indicates the charter will provide or procure most of its own administrative services and that these will be in place by the beginning of staff employment in the spring/summer of 2015. When appropriate, Petitioner will contract with qualified outside providers to provide administrative services as necessary.

#### C. FACILITIES PLAN

#### Potential Facility Location(s)

Petitioner has requested a school facility from SJUSD under Education Code section 47614 (Proposition 39). Petitioner identified SJUSD's Creekside School, located at 2641 Kent Avenue, Sacramento, CA 95821 as a desired site. The petition does not identify an alternate site for either a commercial lease or an existing district school site.

Under Education Code section 47614, SJUSD would only be required to provide a facility to accommodate Petitioner's projected in-district average daily attendance (ADA). Petitioner projects its in-district ADA at 90.7 the first year. (Section 5, Proposition 39 Facility Request.) Petitioner projects total student enrollment of 200 students (192 ADA) in Year One, 350 students in Year Two, 525 students in Year Three, and 875 students in Year Seven. Therefore, even if SJUSD provides a facility in Year One to accommodate in-district students (90.7 ADA/94.5 enrolled), it is unclear what facilities Petitioner would use for the remaining out-of-district students (101.3 ADA/105.5 enrolled) in Year One or for increasing numbers of out-of-district students in future years.

#### **Facility Space**

Facility size is estimated using a bench mark of 70 square feet per student. Based upon Petitioner's projected enrollment figures, the corresponding square footage using the petition's bench mark of 70 square feet per student requires a facility size of 14,000 square feet for Year One, with expansion capacity each year through Year Seven to 61,250 square feet.

#### Costs for Facility Acquisition or Leasing

The petition provides three budget scenarios. Scenario One assumes the charter will acquire a district-owned facility under Proposition 39. Scenarios Two and Three include costs for a commercial lease of a facility at \$1.25 per square feet per month. Scenario One estimates a facility fee due to district/COE of 3% of actuals. Recurring monthly costs for utilities and custodial services are also provided. There are no costs budgeted or identified for facility improvements or for ongoing maintenance of the facility.

#### Summary

The petition discusses the type, size, and costs for the school facility in very general terms. Specific number of classrooms, types of rooms, and sizes are not discussed. Applying the petition's stated goal of a 25:1 student-to-teacher ratio and the cited benchmark of 70 square feet per student, the number of classrooms needed will range from eight (8) in Year One, 14 in Year Two, 21 in Year Three, with a possible need for 28 classrooms at full build out in Year Seven. The total square footage is estimated at 14,000 square feet for Year One, 24,500 square feet for Year Two, 36,750 square feet for Year Three, and 61,250 square feet at full build out in Year Seven.

The desired site of Creekside School was built in 1953 as an elementary school. Details concerning availability, condition, size, number of classrooms, and overall condition of the school are not provided in the petition. The long term suitability of Creekside School as a STEAM middle and high school is questionable. A typical elementary school built in last mid-century does not provide the room capacity or infrastructure needed for a modern science and technology-based curriculum in a middle and high school setting. The estimated cost of a modernization to provide needed improvements ranges from several hundreds of thousands of dollars to well over one million dollars. Budget Scenario One does not contain a line item for any necessary improvements to the school, nor does it include rent or improvements for the facility space needed for the projected (105.5 enrolled/ 101.3 ADA) out-of-district students.

Budget Scenarios Two and Three contain budget entries for a commercial lease. The cost per square foot, \$1.25/month, is cited as a current average for Sacramento and Placer counties. The location, type of lease, and type of building is not stated. The actual cost of the lease could be significantly greater than the \$1.25 estimate depending upon details of the lease contract, including any required upfront tenant improvements, ongoing tenant maintenance, capitol repairs, and common area maintenance (CAM) costs.

Typically, a leased facility requires some level of tenant improvement. The petition does not contain a budget for these improvements. The cost of a

modest improvement under a commercial lease may be estimated at around \$15.00 per square feet; resulting in first year tenant improvement cost of \$210,000, second year \$157,500, and third year \$183,750.

In summary, the petition does not provide adequate information to determine that Petitioner has addressed the requirements of the school facility, the suitability of the desired site (Creekside School) for the 90.7 ADA in-district students, or the availability of an alternate site. The budget scenarios presented do not budget for typical required improvements or ongoing maintenance of a school site.

Based on the lack of a realistic financial and operational plan, Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition.

#### III. PROGRAM ANALYSIS

#### The Soundness of the Educational Program

The County Board may deny a charter petition when it presents an "unsound educational program for the pupils to be enrolled in the charter school." (Ed. Code, § 47605(b)(1).)

Petitioner's goal is to provide a college preparatory, integrated Science, Technology, Engineering, Arts, and Mathematics (STEAM) curriculum with project-based learning, blended learning, differentiated instruction, and personal learning plans.

The SCOE staff review found that the petition fails to present a sound educational program for students requiring special education services and English learners. For general education students, the petition presents a research-based instructional program. However, given the broad scope of intended educational practices and the lack of a detailed plan or timeline to accomplish the numerous expectations, it is unlikely that Petitioner can successfully implement all of its intended practices. Moreover, the petition's lack of adequate measurable pupil outcomes will prevent a full assessment of whether Petitioner's educational objectives are successfully met.

More specific analysis of the educational program is included in Element A below.

#### The Petition's Description of the 16 Required Elements

Under Education Code section 47605(b)(5), a petition's failure to include a reasonably comprehensive description of all 16 statutory elements is grounds for the County Board to deny a charter petition. These elements are each discussed below.

To be "reasonably comprehensive," staff considered whether a description includes information that is substantive; that includes elaboration; that addresses all aspects of the required charter petition elements; that is specific to the charter petition being proposed; that describes the program to a sufficient degree that

improves pupil learning; that increases learning opportunities for pupils of all backgrounds and abilities; that expands educational opportunities; and for which accountability and legal compliance can be reasonably foreseen and assured. Therefore, mere quoting of the law or general statements of educational practices without detailed information about how it will be accomplished by Petitioner do not suffice. (5 Cal. Code Regs., § 11967.5.1(g).)

In considering whether to approve or deny the petition, the County Board may consider that its future oversight will be based on the charter petition itself, as the petition governs the services promised to prospective students and the relationship between the County Board and Petitioner. As such, any incomplete or legally deficient descriptions may raise concerns about the likelihood of success of the overall school program.

#### A. Element A - Description of the Educational Program

## 1. For general education students, the petition describes a research-based instructional program.

For students not requiring special education or English learner services, the petition describes an educational program consistent with research-based instructional practices. The key academic program is a hybrid of research-based practices combined with project-based and experiential learning and Partnership for 21st Century Skills Framework (Appendices G-K), with interdisciplinary themes of global awareness; financial, economic, business, and entrepreneurial literacy; civic literacy; health literacy; and environmental literacy integrated across the curriculum.

Petitioner intends to offer students individual learning plans, community service projects, and advanced placement courses taught through a project-based approach. Students' social and emotional development will be addressed through the Love and Logic curriculum, practices, and methodologies (Appendix M), which is an approach to behavioral management implemented in many schools across the United States since 1977.

Instruction will be delivered using research-based instructional models, including independent learning, small group learning, and whole group learning (Figure 7 - Matrix of Instruction, page 56). Teachers will implement three of the four models of blended learning depending on course content and student needs (Figure 8 - Definition of Blended Learning, page 63). Instruction will be differentiated to meet the needs of students using instructional techniques of flexible grouping, ongoing assessment, and risk-taking learning environment.

# 2. <u>It is unlikely that Petitioner can effectively implement all of its intended practices.</u>

Although each of the described programs, elements, instructional models, and instructional techniques are research-based, the large number of practices Petitioner has selected to initially implement is more than most schools implement in their first two or three years. Typically, successful schools initially

focus on one or two practices. This ensures that there is adequate time for schools and teachers to effectively adopt, implement, and sustain effective practices.

The petition calls for full-day professional development plus weekly blocks of time for collaborative planning. In this allocated time, the petition includes the following professional development and other expectations (pages 151-152):

- Love and Logic training
- o Critical Friends Group
- Create course curriculum
- Develop course benchmark assessments
- Participate in Rubric Development and Grading Systems training
- Learn about Cycle of Inquiry using CFG Model
- Serve on Student Success Teams
- Learn about strategies to support the special populations such as special education and English learner students
- Learn about differentiation in their specific content areas and the assessments used in their content areas
- Learn about Sheltered Instructional Strategies, SDAIE, and/or GLAD strategies
- Map curriculum using the instructional planning tools from Teaching 21st Century Skills
- Collaboratively analyze student work
- Participate in teacher learning networks
- Participate in common collaborative/planning times.

Schools that have effectively implemented their professional development goals have developed a comprehensive, detailed professional development calendar/timetable. There is no evidence of this type of comprehensive, detailed calendar/timetable in the petition.

Also, due to the numerous expectations of teachers, there may not be sufficient time for them to accomplish all that is expected in the time allotted. For example, teachers are expected to plan weekly with their grade level team to map out curriculum, develop benchmark assessments for their content area(s), mentor students, participate in weekly Student Success Team meetings, develop community-based service learning projects, attend and participate in school community events, and learn about and participate in all of the above-mentioned professional development opportunities.

3. The petition includes annual goals and actions to achieve the eight state priorities; however, the eight priorities are not integrated throughout the petition.

Since July 1, 2013, charter schools filing initial charter petitions must incorporate into the petition the required Local Control and Accountability Plan (LCAP) information regarding the eight state priorities. Specifically, charter petitions must include a description of the annual goals and actions in the eight state priority areas in Education Code section 52060 that apply to the grade levels served and the nature of the charter school's program. (Ed. Code, §§ 47605(b)(5)(A(ii).)

The petition includes a chart describing the eight priorities, which it labels achievement goals (pages 125-130). The chart contains the actions Petitioner will take to achieve the goals, the method of assessment, and the persons responsible. The actions described are appropriate to achieve each goal; however, as noted in section III.B below, the petition lacks specific measurable targets for each action. In addition, because most actions are not incorporated throughout the petition narrative, the eight priorities are not an integral part of the petition.

4. The petition does not present a sound educational program for students requiring special education services.

A charter petition is an unsound educational program if it would not likely be of benefit to the pupils who attend. (5 Cal. Code Regs., § 11967.5.1(b)(2).) The petition does not demonstrate that it would adequately serve the educational needs of students requiring special education services.

Petitioner intends to operate as its own Local Educational Agency (LEA) for special education purposes under the auspices of the El Dorado or Sonoma SELPA. As an LEA, Petitioner must demonstrate that it can meet the needs of all eligible students as required by state and federal special education laws. This means that Petitioner must have its own special education systems in place, as would be required of a school district. The petition does not demonstrate that Petitioner can fulfill its responsibilities for administering the continuum of special education services required by law.

The petition contains no description of charter staff's experience, background, or knowledge of special education laws and requirements, nor does it demonstrate an understanding of a LEA's responsibilities for fully serving students with special needs.

The petition includes references to Child Find, Referral, Assessment, and the IEP process. It also states that students will be fully integrated. However, full integration may not be appropriate for all students at all times. The petition does not describe how students with special needs will access the core curriculum. There are no references to the full continuum of program options, such as Resource Specialist, Designated Instructional Services, Special Day Class, Non-public school, etc., nor how transportation would be provided to access special education services.

As detailed in the financial section above, while the petition describes the basic special education dollars it expects to receive, it significantly underestimates its financial responsibilities for providing special education services. The petition does not specifically address the special education funding allocation process. There is no mention of how high cost students will be served, and no dollars are appropriated for assessment purposes, i.e., psychologist.

In summary, Petitioner has no plan for the adequate administration or financing of the full continuum of special education services required by law. Therefore, the petition does not demonstrate that it would adequately serve the needs of students requiring special education services.

5. The petition does not adequately describe how English learners will be served as required by law.

Overall, the petition does not provide sufficient detail to determine that the program for English learners (ELs) is reasonably sound and meets the requirements of federal and state laws as they pertain to providing equal educational opportunities for ELs. As described below, the petition does not adequately serve ELs as legally required in the areas of Program of Instruction, Teacher Qualification, and Reclassification.

#### Initial Identification of ELs

Page 109 of the petition outlines the process for the initial identification of ELs, including the use of the Home Language Survey and conducting the initial English language assessment with the California English Language Development Test (CELDT). The petition meets the initial assessment timeline of testing the students within 30 days of enrollment.

#### Program of Instruction

Federal law requires that in addition to core curriculum, ELs in public schools must receive a program of instruction in English language development (ELD) in order to develop proficiency in English as rapidly and effectively as possible. Although general information about the instructional program is included within the petition, it lacks some key details and a clear articulation of the organizational design of the ELs instructional program that would help demonstrate that students at each English language proficiency level will be provided access to the core curriculum and ELD. Consequently, the petition does not demonstrate that it complies with the instructional program requirements for ELs.

Several sections of the petition provide general information regarding how Petitioner plans to provide an instructional program for ELs. Page 126 assures that "All ELs, not re-designated, will be enrolled in daily ELD in addition to their ELA/Humanities course(s)" and ELD is listed on the "Curriculum Resources by Subject and Grade" table (page 100). A paragraph entitled "English Language Development" on page 97 includes information about ELD materials (EDGE, Language!, and supplemental materials), Specially Designed Academic instruction in English (SDAIE), and the use of English as a Second Language (ESL) strategies. However, the petition lacks the clarifying details that would explain how the proposed services for ELs would be implemented.

The petition omits key information about ELD that would demonstrate how a comprehensive program will be provided for each English learner. Page 110 states that "Newcomers will receive English as a Second Language (ESL) instruction and Teaching English to Speakers of Other Languages (TESOL) strategies will be used to build language proficiency. ESL and TESOL will be provided alongside and in conjunction with English Language Arts." The petition lacks a description for the instructional program that will be provided to ELs that are not identified as "newcomers." Additionally, ELD is not included in the list of PCA Course requirements (page 85), the sequence of courses (page 86), the sample middle school weekly schedule (page 89) or high school weekly schedule (page 91), or within the Curriculum Design (page 95). Additionally, the 2012 California ELD Standards are absent from the curriculum standards matrix (page 96). Without the information noted above, it is not possible to determine that Petitioner intends to ensure that all ELs will receive designated ELD instruction within their educational program.

#### **Teacher Qualifications**

In California, teachers assigned to provide instruction to ELs must be appropriately certified. On page 110, the petition assures that "all teachers at PCA will possess certification to teach English learners in California." However, this assurance conflicts with a statement in another section of the petition. The Teacher Qualifications list notes that teachers may be "CLAD Certified or working toward certification" (page 157). The assignment of teachers without the appropriate certification to provide instruction to ELs violates the requirement.

Based on the conflicting information within the petition, it is not possible to verify that the petition complies with the certification requirements for teachers. This requirement is significant given that Petitioner estimates 10% of students in the district are designated as ELs, and that Petitioner "intends to include families from the same range of socio-economic, racial, linguistic, and cultural backgrounds as the areas served by SJUSD" (page 50).

#### Reclassification

Page 109 assures that "PCA will monitor and adjust the (redesignation) processes...as dictated by the State Board of Education, in order to stay in full compliance with all state and federal rules and regulations." The petition lists the general guidelines that will be used to reclassify ELs to fluent-English proficient status. (Ed. Code, § 313.) There are no criteria for evaluating the English language performance on CELDT or an explanation of the objective measure that will be used to measure basic skills, including an acceptable cut-point for performance. Additionally, the petition does not address how ELs who become fluent-English proficient will be monitored for at least two years after their reclassification. Although the petition assures that the proper procedures will be followed, it is not possible to determine whether or not the appropriate criteria are being applied to determine whether a student is eligible for reclassification. (20 U.S.C. § 6841; Cal. Code Regs., tit. 5, § 11304; Ed. Code, § 313(d).)

#### Assessment and Parent Communication

The petition adequately addresses assessment of ELs and appropriate communications with parents of ELs.

#### 6. Summary of Educational Program

The petition does not demonstrate that it would adequately serve students requiring special education services and ELs. While the petition describes research-based instructional programs for general education students, given the broad scope of intended educational practices and the lack of a detailed plan or timeline to accomplish the numerous expectations, it is unlikely Petitioner can successfully implement all of its intended practices. As noted below, the lack of adequate measurable pupil outcomes will prevent a full assessment of whether Petitioner's educational objectives are successfully met.

# Based on the above discussion, the petition does not contain a reasonably comprehensive description of the educational program.

#### B. Element B - Measurable Pupil Outcomes

The regulations require that Petitioner specify "measurable pupil outcomes," specifically, skills, knowledge, and attitudes that reflect the school's educational objectives that can be assessed by objective means that are frequent and sufficiently detailed to determine whether students are making satisfactory progress. (5 Cal. Code Regs., § 11967.5.1(f)(2).) In addition, the pupil outcomes must align with the state priorities, as described in Education Code section 52060(d), that apply for the grade levels served or the nature of the program operated by the charter school. (Ed. Code, § 47605(b)(5)(B).)

Although the petition addresses the eight state priorities, Figure 26 on pages 125-130 does not include specific measurable goals or targets for each specified action or metric. General references to "the charter school will meet or exceed the same accountability standards as district schools" are insufficient for determining Petitioner's goals, holding Petitioner accountable for meeting those goals, and determining whether students are making satisfactory progress.

Typically, petitions include quantifiable measurable outcomes with specific annual targets such as "at least 85% of families will participate in school sponsored events and activities," or "100% of 6th grade student will complete the service learning requirement," or "75% of students will meet their reading goals as outlined in their individual learning plans and as measured by the benchmark assessments." Because the petition lacks specific goals and targets for the measurable outcomes outlined in Figure 26, it is very difficult to understand the expectations for students and hold Petitioner accountable for ensuring its goals are met.

A number of the core tenets described in Petitioner's vision, academic focus, and plan section are not present in Figure 26 or elsewhere in this section. In particular, given the Science, Technology, Engineering, Art, and Mathematics (STEAM) focus of the charter, the petition should identify additional measurable outcomes in the areas of technology and art, yet none are mentioned. Measures of other core tenets of Petitioner's educational program such as civic literacy, environmental literacy, and the personal and career skills outlined in the P21 framework are also missing.

On page 124, the petition describes the intent to disaggregate data for each measurable outcome included in Figure 25, but then cites an outdated definition for numerically significant pupil subgroups. This definition was amended in 2013 by the Local Control Funding Formula legislation. Currently, any student group with 30 or more pupils must be reported for all measurable goals for LCAP, and other state and federal required reporting. (Ed. Code, § 52052(a)(3(A).) The petition should be updated to reflect California's current definition of a numerically significant student group.

In summary, the petition describes actions aligned to each of the eight required priorities and their proposed methods of assessment, but does not set specific quantifiable goals for the various actions. The lack of information about quantifiable goals and annual targets for student achievement makes it difficult to understand Petitioner's expectations for students and to determine if the school and students are making satisfactory progress.

Based on the above, the petition does not contain a reasonably comprehensive description of the measurable pupil outcomes identified for use by the school.

#### C. Element C - Method of Measuring Pupil Progress

The petition must specify the methods by which pupil progress in meeting the specific pupil outcomes will be measured. To the extent practicable, the method for measuring pupil outcomes for the state priorities shall be consistent with the way information is reported on the school accountability report card. (Ed. Code, § 47605(b)(5)(C).)

The school must utilize a variety of assessment tools that are appropriate to the skills, knowledge, or attitudes being assessed, including at a minimum, tools that employ objective means of assessment. This must also include the annual assessment results from any state mandated testing program; a plan for collecting, analyzing, and reporting data on student achievement to school staff, parents, and others; and a plan for utilizing the data for continuous monitoring and program improvement.

The petition describes multiple methods to assess pupil outcomes. Because the connection between the various assessment tools and the outcomes or action steps identified in the previous section is poor, it is difficult to ascertain which tools will be used to evaluate performance and progress for which action steps/outcomes. Again, with a focus on STEAM, assessment tools to measure art, technology skills, and science in grades other than eight and ten should be included in Figure 26 (page 135); however, Petitioner does not indicate how it will measure those student skills.

The petition includes a lengthy description about how the Cycle of Inquiry will be used to evaluate and analyze student data in a variety of settings and with a variety of stakeholders, but it is not clear how the research-based practices outlined in the Cycle of Inquiry and the various other frameworks on which Petitioner's educational program are based will be integrated into the school program.

The methods of assessment plan includes a description of multiple measures that Petitioner will use to evaluate student performance and progress and communicate with parents, its authorizing agency, and other stakeholders. More attention should be paid to operationalizing the cited research-based practices (i.e., P21 framework, Cycle of Inquiry, etc.) into programs, practices, processes, and policies at the school site.

While this section could be improved as noted above, the petition does contain a reasonably comprehensive description of the methods by which pupil progress in meeting the identified pupil outcomes is to be measured.

#### D. Element D – Governance Structure of the School

The petition describes the membership and duties of the board of directors and states that the school will encourage the participation of parents, faculty, staff, and students. It includes bylaws, articles of incorporation, and a conflict of interest code consistent with the Political Reform Act. It specifies that the board will comply with the Ralph M. Brown Act.

The petition (pages 146-147) states that "parents will be obligated to contribute a minimum number of volunteer hours per family, per academic year to the Charter School," and that "no child will be excluded from the Charter School or school activities due to the failure of his/her parent or legal guardian to fulfill the minimum parent participation hours." While public schools, including charters, can request a certain number of parent volunteer hours and identify the benefits to the school, they cannot require or obligate parents to volunteer. (Ed. Code, § 49011; See also CDE Fiscal Management Advisory 15-01 (January 21, 2015).) Therefore, the parent volunteer "obligation" requires correction.

With the above correction, the petition contains a reasonably comprehensive description of the governance structure of the school.

#### E. Element E - Staff Qualifications

The petition identifies the general qualifications of various categories of employees the school anticipates and includes job descriptions and responsibilities for key positions.

The petition should clarify that teachers must hold a Commission on Teacher Credentialing certificate, permit, or other document equivalent to that which a teacher in other public schools would be required to hold to serve English learners (ELs) (i.e., an English Language Authorization). The teacher job description states that teachers will be "CLAD Certified or working toward certification;" however, teachers without the appropriate certification may not provide instruction to ELs. In addition to not requiring an authorization to serve ELs, the job description refers to only one of several authorizations available to serve ELs.

Subject to the above correction, the petition contains a reasonably comprehensive description of the qualifications to be met by staff.

#### F. Element F - Health and Safety Procedures

Petitioner will require that employees undergo a criminal background check as required by Education Code section 44237. However, the statement that volunteers having direct contact with students would not need to be fingerprinted if they are working under supervision of a credentialed employee requires correction, as it conflicts with Education Code requirements.

Tuberculosis screening is required for staff prior to working with students as required by Education Code section 49406. Students and staff must provide immunization records as is required of all public schools. Students will be screened for vision, hearing, scoliosis, and oral health.

Petitioner affirms that it will comply with facility safety requirements and will prepare a plan for disasters and emergencies.

Subject to the above correction, the petition contains a reasonably comprehensive description of the health and safety procedures.

#### G. Element G - Achievement of Racial and Ethnic Balance

Recognizing the limitations on admissions to charter schools imposed by Education Code section 47605(d), the means by which the school will achieve a racial and ethnic balance among its students that is reflective of the general populations residing within the territorial jurisdiction of the school district to which the charter petition is submitted is presumed met, absent specific information to the contrary. (5 Cal. Code Regs., § 11967.5.1(f)(7).)

Beginning on page 164, the petition verifies the commitment to recruit and create a school community that reflects the diversity of the school district. The petition describes proposed outreach, including outreach materials in other languages, community outreach, etc.

The petition contains a reasonably comprehensive description of the means by which the school will achieve a racial and ethnic balance among its pupils that is reflective of the general population residing within the territorial jurisdiction of the school district.

#### H. Element H - Admission Requirements

The admission procedures allow for enrollment of all students who wish to attend, and if applicants exceed capacity, then for admission based on a public random drawing. The petition describes the procedures for the public random drawing; exempts existing students from the lottery; and describes preferences for siblings, children of the school's employees, Board members, founding members (not to exceed 10% of the student population), and pupils who reside within the school district. These admission preferences are permitted by law.

The petition contains a reasonably comprehensive description of its admission requirements.

#### I. Element I - Independent Financial Audits

The petition describes an annual independent audit process that is in accordance with state law and that will involve the Board of Directors and the charter authorizer.

The petition contains a reasonably comprehensive description of the annual independent financial audit.

#### J. Element J - Suspension or Expulsion of Students

The petition includes a detailed description of the suspension and expulsion process, including a list of offenses for which a student may be disciplined, notice to students and parents, due process protections, and provisions for students with special needs.

The petition contains a reasonably comprehensive description of the procedures by which pupils can be suspended or expelled.

#### K. Element K - STRS/PERS Systems

The petition states certificated teachers and administrators shall participate in the State Teachers' Retirement System (STRS). The petition states non-certificated full-time and part-time employees will contribute to Social Security.

The petition contains a reasonably comprehensive description of the manner by which staff members of the charter school will be covered by the STRS, PERS, or Social Security system.

#### L. Element L - Student Attendance Alternatives

The petition appropriately states that no student is required to attend, students who choose not to attend may attend other public schools in the district, and that all parents and students will be informed that students have no right to admission in a particular school of a local education agency as a consequence of enrollment in the charter school.

The petition contains a reasonably comprehensive description of the public school attendance alternatives.

#### M. Element M - Rights of Employees

The petition contains a reasonably comprehensive description of the rights of employees upon leaving employment of the district and any rights of return.

#### N. Element N - Dispute Resolution

The petition contains a reasonably comprehensive description of a dispute resolution process.

#### O. Element O - Exclusive Public School Employer

Petitioner notes that it is the exclusive public school employer for the purposes of the Educational Employment Relations Act (EERA) and will comply with all provisions of the EERA.

The petition includes the required declaration; and therefore, contains a reasonably comprehensive description of this element.

#### P. Element P - Closure Procedures

The closure procedures described on pages 195-197 includes appropriate notice, a final independent audit to determine assets and liabilities, and plans for disposing of any net assets (as described in the bylaws) and for the maintenance and transfer of pupil records.

The petition contains a reasonably comprehensive description of the necessary closure procedures.

#### CONCLUSION

Based on the SCOE staff analyses and legal review, it is recommended that the Paramount Collegiate Academy charter petition appeal be denied on the grounds that:

- 1. The petition lacks a sound financial and operational plan;
- The petition does not present a sound educational program for students requiring special education services and English learners;
- 3. The petition does not contain reasonably comprehensive descriptions of certain elements required by Education Code section 47605(b)(5), specifically, the educational program and measurable pupil outcomes; and
- 4. Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition.

#### PARAMOUNT COLLEGIATE ACADEMY

#### SBE APPEAL PACKET

#### **Enclosure 3**

County Board Meeting Agenda for Adoption of Findings for Denial County Confirmation of Denial, dated February 18, 2015 County Staff Report and Findings for Denial Charter School Response to County Staff Report (including attachments)

# Sacramento County Board of Education Regular Meeting

Tuesday / February 17, 2015 / 6:30 P.M.

10474 Mather Boulevard P.O. Box 269003 Sacramento, CA 95826-9003 916.228.2410

#### SACRAMENTO COUNTY BOARD OF EDUCATION 10474 Mather Boulevard P.O. Box 269003 Sacramento, California 95826-9003

TO:

Members, County Board of Education

FROM:

David W. Gordon, Secretary to the Board

SUBJECT: Agenda - Regular Meeting - Tuesday, February 17, 2015

Regular Session: 6:30 p.m.

**NOTE**: The Sacramento County Office of Education encourages those with disabilities to participate fully in the public meeting process. If you need a disability-related modification or accommodation, including auxiliary aids or services, to participate in the public meeting, contact the Superintendent's Office at 916.228.2410 at least 48 hours before the scheduled Board meeting so that we may make every reasonable effort to accommodate you. [Government Code § 54953.2; Americans with Disabilities Act of 1990, § 202 (42 U.S.C. § 12132).]

- I. Call to Order and Roll Call
- II. Pledge of Allegiance
- III. Approval of the Minutes of the Regular Board Meeting of February 3, 2015
- IV. Adoption of Agenda
- V. Official Correspondence
- VI. Visitor Presentations
  - A. General Public
  - B. Employee Organizations

NOTE: Anyone may address the Board on any item that is within the Board's subject matter jurisdiction. However, the Board may not take action on any item not on this agenda except as authorized by Government Code section 54954.2.

Anyone may appear at the Board meeting to testify in support of or in opposition to any item being presented to the Board for consideration. If possible, notify the Board President or Board Secretary in writing prior to the meeting if you wish to testify.

- VII. Superintendent's Report
  - A. Recognition of the March 2015 Employees of the Month

#### Agenda – Regular Meeting – February 17, 2015 Page 2

Classified Employee: Natalya Edwards, Transition Specialist, Sacramento Community Based Coalition

Certificated Employee: Joseph Wilson, Regional Occupational Program/Career Technical Education Teacher, Sacramento Community Based Coalition

#### VIII. New Business

- A. Adoption of Consent Agenda David W. Gordon
  - 1. Accept Report on Personnel Transactions Effie Crush
  - 2. Award Diplomas to Court and Community School Students Dr. Matt Perry
  - 3. Accept Donation to Academic Decathlon Sue Stickel
  - Declaration of Equipment Listed as Surplus Property and Authorization to Dispose of Equipment Pursuant to Education Code – Tammy Sanchez
- B. Approval of Contracts Tammy Sanchez
- C. No Grant Applications/Service Contracts
- D. Public Hearing, Discussion, and Action on Paramount Collegiate Academy Charter Petition Appeal – Tammy Sanchez/Sue Stickel
- E. Designation of the May 19, 2015 Board Meeting for the Operation Recognition Event David W. Gordon
- IX. Board Reports, Comments, and Ideas
  - A. Board Members
  - B. Board President
  - C. Committees
- X. Items for Distribution
  - A. February/March Events
  - B. February/March Site Visits
- XI. Schedule for Future Board Meetings
  - A. March 3, 2015 Technology Services, Mental Health
  - B. March 17, 2015 Study Session Promising Practices Supporting Academic Achievement in California Juvenile Court and Community Schools
- XII. Adjournment

#### Unapproved

#### SACRAMENTO COUNTY BOARD OF EDUCATION

#### Minutes of the Regular Meeting of February 3, 2015

#### Agenda

- Call to Order and Roll Call
- Pledge of Allegiance
- III. Approval of the Minutes of the Regular Board Meeting of January 13, 2015
- IV. Adoption of Agenda
- V. Official Correspondence
- VI. Visitor Presentations
  - A. General Public
  - B. Employee Organizations
- VII. Superintendent's Report
- VIII. New Business
  - A. Adoption of Consent Agenda
    - 1. Accept Report on Personnel Transactions
    - 2. Award Diplomas to Court School Students
    - 3. Authorization to Seek Bids for External Financial Auditing Services
    - Approval of 2013-2014 School Accountability Report Cards for Court and Community Schools and Special Education Programs
    - 5. Accept Donation to Sly Park Environmental Education Center
  - B. Approval of Contracts
  - C. Authorization to Submit Grant Applications/Service Contracts and Accept Funding if Awarded; and Approval of Contracts, Positions, and Other Expenditures Associated with the Grants as Outlined in the Proposed Budgets
    - \$750,000 Education for Homeless Children and Youth (EHCY) grant from the California Department of Education/McKinney-Vento Act federal funds for the period July 1, 2015 through June 30, 2018
    - \$161,142 Title III Years 2 and 4 Technical Assistance grant from No Child Left Behind, Title III funds for the period February 4, 2015 through September 30, 2016
    - \$300,000 Schwab, Bechtel, & Silver Giving Foundations grant for the implementation of the Common Core State Standards (CCSS) from the Charles and Helen Schwab foundation, S.D. Bechtel, Jr. Foundation, and the Silver Giving Foundation for the period November 1, 2014 through June 30, 2016
    - \$35,000 Summer Matters grant from the Packard Foundation for the period February 4, 2015 through October 10, 2015
  - D. Board Report Governor's Proposed 2015 Budget and Post-Proposition 30 Projections
  - E. Board Report Center for Student Assessment and Program Accountability (C-SAPA)
- IX. Board Reports, Comments, and Ideas
  - A. Board Members
  - B. Board President
  - C. Committees

### San Juan Unified School District and Sacramento County Office of Education Findings for Denial

- X. Items for Distribution
  - A. February/March Events
  - B. February/March Visits
- XI. Schedule for Future Board Meetings
  - A. February 14, 2015 Board/Superintendent Retreat
  - B. February 17, 2015 Mental Health
  - C. March 3, 2015 Technology Services
  - D. March 17, 2015 Study Session Promising Practices Supporting Academic Achievement in California Juvenile Court and Community Schools
- XII. Adjournment
- I. President Rivas called the meeting to order at 6:30 p.m. in the Board Room of the David P. Meaney Education Center, Sacramento County Office of Education, 10474 Mather Boulevard, Mather, California. Board members present were Harold Fong, Greg Geeting, Eleanor Brown, Brian Rivas, Thomaysa Glover, John Scribner, and Jackie Levy. Also present were David W. Gordon, Superintendent and Secretary to the Board; Sue Stickel, Deputy Superintendent; Teresa Stinson, General Counsel; Robin Pierson, Mark Vigario, Matt Perry, Tammy Sanchez, and John Fleischman, Assistant Superintendents; Effie Crush, Chief Administrator-Human Resources; Tim Herrera, Director of Communications; Bill Mullen, CSEA; other staff and visitors; and Carla Miller, Recording Secretary.
- Ms. Glover led the Pledge of Allegiance.
- III. On a motion by Mr. Scribner and seconded by Ms. Glover, the revised minutes of the regular meeting of January 13, 2015 were approved. Motion carried unanimously (7 ayes).
- IV. Ms. Glover moved and Ms. Levy seconded the motion to adopt the agenda. Motion carried unanimously (7 ayes).
- There was no official correspondence.
- VI.A. There were no requests for visitor presentations from the general public.
- VI.B. There were no requests for presentations from employee organizations.
- VII. Superintendent Gordon reported on the following:
  - He thanked everyone who attended the Sacramento Community Based Coalition (SCBC) Awards event on January 15, where clients who are committed to making a successful reentry into their communities were honored.

- He invited everyone to attend the Poetry Out Loud competition on Thursday, February 5, 2015 at 12:30 p.m. in the Rosemont High School auditorium.
- He invited everyone to attend the 35<sup>th</sup> Annual Sacramento County Academic Decathlon on Saturday, February 7, 2015 at Inderkum High School in Natomas. The Super Quiz begins at 3:45 p.m. The Academic Decathlon awards banquet will be held on Tuesday, February 10, 2015 in the California State University Sacramento Ballroom at 6:00 p.m.
- On Monday, February 9, 2015, all SCOE offices will be closed in observance of the Lincoln Holiday. On Monday, February 16, 2015, all SCOE offices will be closed in observance of the Washington Holiday.

VIII.A. Ms. Levy moved and Mr. Geeting seconded adoption of the consent agenda with the following addition by Mr. Geeting: Approve Item VIII.A.4. – 2013-2014 School Accountability Report Cards for Court and Community Schools and Special Education Programs with authority given to staff to make technical adjustments as necessary as they do the final review prior to posting the report cards. Ms. Levy, who made the original motion, agreed to the addition. By such action, the Board:

- 1. Accepted the report on Personnel Transactions
- 2. Awarded diplomas to Court School Students
- 3. Authorized staff to seek bids for External Financial Auditing Services
- 4. Approved the 2013-2014 School Accountability Report Cards for Court and Community Schools and Special Education Programs (SARCs)
- 5. Accepted donation to Sly Park Environmental Education Center

Mr. Fong requested that item VIII.A.4. be considered separately from items 1, 2, 3, and 5.

Ms. Levy and Mr. Geeting accepted the amendment to the motion.

Dr. Matt Perry, Assistant Superintendent, announced that the following students will be awarded a diploma: 3 candidates from El Centro Jr./Sr. High School and 1 candidate from Morgan Jr./Sr. High School.

Motion approving Consent Items 1, 2, 3, and 5 carried unanimously (7 ayes).

After questions and discussion about the SARCs, Mr. Geeting moved to approve Item VIII.A.4. – 2013-2014 School Accountability Report Cards for Court and Community Schools and Special Education Programs with authority given to staff to make technical adjustments as necessary as they do the final review prior to posting the report cards. Ms. Glover seconded the motion. Motion carried unanimously (7 ayes).

VIII.B. Mr. Geeting moved and Ms. Brown seconded approval of the contracts as listed. Motion to approve the contracts carried unanimously (7 ayes).

- VIII.C. On a motion by Ms. Glover, seconded by Ms. Levy, and carried unanimously (7 ayes), the Board authorized staff to submit grant applications/services contracts and accept funding if awarded; and approved contracts, positions, and other expenditures associated with the grants as outlined in the proposed budgets as follows:
  - \$750,000 Education for Homeless Children and Youth (EHCY) grant from the California Department of Education/McKinney-Vento Act federal funds for the period July 1, 2015 through June 30, 2018
  - \$161,142 Title III Years 2 and 4 Technical Assistance grant from No Child Left Behind, Title III funds for the period February 4, 2015 through September 30, 2016
  - \$300,000 Schwab, Bechtel, & Silver Giving Foundations grant for the implementation of the Common Core State Standards (CCSS) from the Charles and Helen Schwab Foundation, S.D. Bechtel, Jr. Foundation, and the Silver Giving Foundation for the period November 1, 2014 through June 30, 2016
  - 4. \$35,000 Summer Matters grant from the Packard Foundation for the period February 4, 2015 through October 10, 2015

VIII.D. Tammy Sanchez, Assistant Superintendent, provided a report to the Board on the Governor's Proposed 2015 Budget and Post-Proposition 30 Projections.

VIII.E. Rachel Perry, Director, provided a report to the Board on the Center for Student Assessment and Program Accountability (C-SAPA).

IX.A. Ms. Levy – no report.

Mr. Scribner - no report.

Ms. Glover - no report.

Ms. Brown provided a summary of tonight's Policy Committee meeting: one policy related to the use of facilities will be forwarded to the Board for first reading. She reported that she was impressed with the level of detail in the job descriptions, as well as the new classified performance evaluation when she attended the Personnel Commission Meeting on January 15. She reported that while speaking about her new program, Family Violence, at a Chamber of Commerce meeting, Jan Scully applauded Superintendent Gordon and the county for the wonderful work it does in this area.

Mr. Geeting reported that it was a pleasure to join President Rivas at the Sacramento reception for Ryan Smith, the new Executive Director of Education Trust-West, on January 14. Mr. Geeting described Mr. Smith's professional experience, noting that he brings a strong background to Education Trust-West's ambitious effort to close opportunity and achievement gaps for students who have been traditionally underserved in California's public education system. He added that Mr. Smith would be

an excellent speaker to consider for a future meeting of the County School Boards Association. He reported that he attended the SCBC Awards Ceremony on January 15 and learned that SCBC had served 341 clients, well exceeding its target of 300, and that fewer than two percent had returned to custody. On January 16 and 17, he participated in the annual Sacramento CASA Crab Feed, which brought in nearly \$90,000 for the organization. On January 26, former State Senator (and Education Secretary) Gary Hart held a reception at his home for newly elected Sacramento City Unified Board Member Jessie Ryan. He also shared that he was pleased to meet with the Student Leadership Team from Gerber, who visited the Meaney Center with their teacher and advisor-mentor Daniel Watts on January 28. When he inquired about their concerns, a primary concern was the quality (or lack thereof) of the food served at Gerber. Finally, he shared that the Autumn 2014 edition of "The Special EDge" newsletter included an excellent article on the subject of "creating effective systems" for school leadership. In the article, five of "California's most successful school leaders" were interviewed, including: Dr. Steve Winlock and Judy Holsinger. The Special EDge newsletter is available on the California Services for Technical Assistance and Training (CalSTAT) website, which is CalSTAT.org. There is also a link to it on the California Department of Education website.

Mr. Fong asked whether the Board would receive materials, in addition to the agenda, for the Board/Superintendent Retreat. He also mentioned that a local group received a restorative justice grant and wondered if SCOE could participate in that and bring it to SCOE's court and community schools. He noted that President Rivas will be discussing the student focus groups.

President Rivas asked that the hand-outs be sent to the Board prior to the Board/Superintendent Retreat and requested that Superintendent Gordon check on the restorative justice grant that Mr. Fong mentioned.

Superintendent Gordon asked Mr. Fong to provide more information on the restorative justice grant.

IX.B. President Rivas reported that Mr. Fong had asked about having another round of student focus groups, and SCOE agreed to do it again. President Rivas will establish a new group and asked Board members to contact him if they are interested in serving on the committee.

Ms. Brown stated she wants the Board to follow up with the students, but does not necessarily need to be on the focus group committee.

Dr. Perry provided an update on the food at Gerber. Principal Douglas has been working with Elk Grove Unified School District to ensure the menu has a lot of variety. The Request for Proposals that went out to vendors did not get any applicants because the contract is so small. SCOE has approached the company that Fortune uses.

Ms. Sanchez stated that beginning in March, students can order hot lunches from the cafeteria.

Mr. Fong suggested using either Elk Grove's or SCOE's Culinary Arts Café.

Superintendent Gordon stated that in order to get reimbursed, SCOE needs an approved provider.

- IX.C. There were no committee reports.
- X.A. There was no distribution of the February/March Events item.
- X.B. There was no distribution of the February/March Site Visits item.
- XI. Schedule for Future Board Meetings
  - A. February 14, 2015 Board/Superintendent Retreat
  - B. February 17, 2015 Mental Health
  - C. March 3, 2015 Technology Services
  - D. March 17, 2015 Study Session Promising Practices Supporting Academic Achievement in California Juvenile Court and Community Schools

XII. Mr. Geeting moved to adjourn the meeting in memory of JaeZon Frazier, a student in SCOE's Infant Development Program, who passed away tragically on January 21 at the age of two and a half. JaeZon is survived by his mother, Jazmin, seven-year-old sister, Erikiah, and grandmother, Bertha. The Board sends heartfelt condolences to the family at this difficult time. Mr. Scribner seconded the motion, which carried unanimously (7 ayes). The meeting adjourned at 8:25 p.m.

Respectfully submitted,

David W. Gordon Secretary to the Board

Date approved:



MAILING: P.O. Box 269003, Sacramento, CA 95826-9003 PHYSICAL LOCATION: 10474 Mather Boulevard, Mather, CA

(916) 228-2500 · www.scoe.net

David W. Gordon Superintendent

February 18, 2015

**BOARD OF EDUCATION** 

Via Email

Brian M. Rivas President

Dawn Contreras Douglas, Lead Petitioner Paramount Collegiate Academy

Eleanor L. Brown, Ed.D. Vice President

3510 Hazeltine Lane Roseville, CA 95747

Harold Fong, M.S.W.

Re:

Paramount Collegiate Academy Charter School Petition Appeal

Thomaysa M. Glover

Jacquelyn Levy

**Greg Geeting** 

Dear Ms. Contreras Douglas:

John C. Scribner

The Sacramento County Board of Education (County Board) considered and denied the Paramount Collegiate Academy's charter petition appeal at a public hearing on February 17, 2015.

Within 180 days of the County Board's denial, you may submit your charter petition appeal to the State Board of Education. (Ed. Code, § 47605, subd. (j)(1); Cal. Code Regs, tit. 5, § 11967(a).)

Sincerely,

Teresa Stinson General Counsel

TS:mr

cc: Kent Kern, Superintendent, San Juan Unified School District Linda C.T. Simlick, General Counsel, San Juan Unified School District Donna O'Neil, Ed.D., Associate Superintendent, Schools and Student Support, San Juan Unified School District





MAILING: P.O. Box 269003, Sacramento, CA 95826-9003 PHYSICAL LOCATION: 10474 Mather Boulevard, Mather, CA

(916) 228-2500 · www.scoe.net

David W. Gordon Superintendent February 13, 2015

**BOARD OF EDUCATION** 

Brian M. Rivas President

Eleanor L. Brown, Ed.D. Vice President

Harold Fong, M.S.W.

**Greg Geeting** 

Thomaysa M. Glover

Jacquelyn Levy

John C. Scribner

Dawn Contreras Douglas, Lead Petitioner Paramount Collegiate Academy

3510 Hazeltine Lane Roseville, CA 95747

Re: Paramount Collegiate Academy Charter School Petition Appeal

Dear Ms. Contreras Douglas:

The enclosed portions of the Executive Summary and Recommended Findings of Fact regarding the Paramount Collegiate Academy charter petition appeal have been revised based on information we recently obtained from the California Department of Education. Please replace pages VIII.D.4., VIII.D.6., and VIII.D.8. through VIII.D.12. of the original February 17, 2015 agenda item (previously emailed to you on February 10, 2015) with these revised pages.

Additionally, enclosed you will find correspondence recently received from the San Juan Unified School District regarding the Paramount Collegiate Academy charter school petition appeal, which has been provided to the County Board.

If you have questions, please contact me at (916) 228-2652.

Sincerely.

Teresa Stinson General Counsel

TS:mr

**Enclosures** 

cc: Kent Kern, Superintendent, San Juan Unified School District Linda C.T. Simlick, General Counsel, San Juan Unified School District



#### **EXECUTIVE SUMMARY**



SCOE staff reviewed the Paramount Collegiate Academy's (Petitioner) charter petition appeal under California law, Board Policy, and Administrative Rules and Regulations, and recommends that the Board deny the petition.

#### Background; Introduction and Standard of Review (Page VIII.D.6.)

#### I. Technical Requirements (Page VIII.D.7.)

Petitioner submitted sufficient parent and teacher signatures and the documents required to begin the charter petition review process.

#### II. Financial and Operational Analysis (Pages VIII.D.7. - VIII.D.14.)

Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition because Petitioner's financial and operational plan is not realistic. The budget does not adequately budget for special education, facilities, and other costs. Suggested budget revisions would result in shortfalls of <a href="mailto:attentary.com/suggested-budget-revisions-would-result-in-shortfalls-of-at-least-\$466,492">4266,492</a> in Year One, \$649,097 \$299,097 in Year Two, and \$528,437 \$178,437 in Year Three. These shortfalls will increase significantly if the charter does not begin each school year with 96% attendance and Petitioner's projected enrollment of 200, 350, and 525 students in its first three years.

#### III. Program Analysis (Pages VIII.D.14. – VIII.D.25.)

The petition does not present a sound educational program for students requiring special education services and English learners. For general education students, the petition describes a research-based educational program. However, given the broad scope of intended educational practices and the lack of a detailed plan or timeline to accomplish the numerous expectations, it is unlikely that Petitioner can successfully implement all of its intended practices. Moreover, the petition's lack of adequate measurable pupil outcomes will prevent a full assessment of whether Petitioner's educational objectives are successfully met.

#### CONCLUSION

SCOE staff recommends that the Paramount Collegiate Academy's charter petition be denied on the grounds that the financial and operation plan is unsound and Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition. In addition, the petition does not present a sound educational program for students requiring special education services and English learners; and does not contain reasonably comprehensive descriptions of certain elements required by Education Code section 47605(b)(5) (educational program and measurable pupil outcomes).



# Sacramento County Office of Education Recommended Findings of Fact Paramount Collegiate Academy Charter School Petition

#### BACKGROUND

Paramount Collegiate Academy (Petitioner) seeks to operate a charter school in the San Juan Unified School District (SJUSD) serving 6th through 12th grade students. The intention is to offer a college preparatory, project-based Science, Technology, Engineering, Arts, and Mathematics (STEAM) middle/high school with blended learning. The petition envisions enrolling 200 students in grades 6-9 in its first year of operation, with one grade added each successive year through grade 12 in year four. At full capacity, Petitioner expects to serve 875 students in grades 6-12, with a student population representative of the general population of SJUSD.

Petitioner has submitted signatures of parents/legal guardians who affirm that they are meaningfully interested in having their children attend the charter school, which is equivalent to at least one-half the number of pupils that Petitioner estimates will enroll in the school during the first year of operation. (There are 179 parent/guardian signatures of students expected to be in grades 6-9 in 2015-2016.) Petitioner has also submitted the signatures of nine teachers who affirm they are meaningfully interested in "employment with Paramount Collegiate Academy."

On November 18, 2014, the SJUSD governing board denied the Paramount Collegiate Academy charter petition on the grounds that: (1) the petition presents an unsound educational program and would not adequately serve students requiring special education services and English learners; (2) Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition because the financial plan is flawed and not reasonably comprehensive; and (3) the petition does not contain a reasonably comprehensive description of certain required elements, including the description of the educational program, measurable pupil outcomes, and measurement of pupil progress toward outcomes.

Petitioner submitted appeal documents to the Sacramento County Office of Education (SCOE) on December 17, 2014 and completed its appeal on December 19, 2014. If the Sacramento County Board of Education (County Board) denies the appeal, Paramount Collegiate Academy may appeal the decision to the State Board of Education.

#### INTRODUCTION AND STANDARD OF REVIEW

A county board of education may not deny a charter appeal unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the following findings set forth in Education Code section 47605(b)(1) through (5):

- The charter school presents an unsound educational program for the pupils to be enrolled in the charter school.
- (2) The petitioner is demonstrably *unlikely to successfully implement* the program set forth in the petition.

(2) present a budget that in its totality appears viable and, over a period of no less than two years of operation, provides for the amassing of a reserve equivalent to that required by law for a school district of similar size; (3) demonstrate the necessary background or understanding of school finance and business management critical to the charter school's success, or a plan to secure the services of individuals with the necessary background; or (4) reflect reasonable costs for the acquisition or leasing of facilities, taking into account the facilities the charter may be allocated under Education Code section 47614. (5 Cal. Code Regs., § 11967.5.1(c)(3)(B), (c)(3)(D), (c)(4).)

#### A. FINANCIAL ANALYSIS

In general, the budget assumptions were well thought out and in many cases, conservative. However, there were many areas where a clear understanding of school financing was lacking, which required that SCOE make large adjustments to the budget. Because the adjustments went in both directions, sometimes helping and sometimes hurting the bottom line, a complete budget summary is included at the end of this analysis. In short, necessary budget revisions result in negative fund balances in the first three years of operation of at least:

2015/16	2016/17	2017/18
(\$466,492)	(\$649,097)	(\$528,437)
(\$266,492)	(\$299,097)	(\$178,437)

More problematic, these shortfalls will grow if the charter does not begin with 200 students enrolled on the first day of school who attend 96% of the time in Year One. Petitioner's budget is based upon very aggressive growth schedules of 350 students enrolled in Year Two and 525 students enrolled in Year Three. The above shortfalls would increase significantly should Petitioner not begin each year with the projected attendance.

Adjustments to Petitioner's budget are as follows:

 Revenues included a line item for Transfer of Charter Schools in Lieu of Property Taxes. First, a county office would not make a property tax transfer. Second, if SJUSD had approved this charter, this revenue was not applied properly to the Local Control Funding Formula (LCFF) entitlement.

In either scenario, there is no additional money for a property tax transfer. For every dollar received in property taxes, a dollar is deducted from the state, making the net impact \$0. Therefore, revenue is overestimated as follows:

- Year One \$155,520
- Year Two \$272,160
- Year Three \$408,240
- The Federal Revenue includes start-up grants for \$225,000 in the current year, \$200,000 in 2015/16, and \$150,000 in 2016/17. When we first contacted the California Department of Education's (CDE) Charter

School Division, CDE said that Petitioner would not receive grants in each of the three years. When we contacted CDE again recently, the Interim Director of CDE's Charter School Division informed us that Petitioner may be eligible for \$575,000 over three years, but could not specifically verify that Petitioner will receive this amount. Because of this ambiguity, we have given Petitioner the benefit of the doubt and credited the full \$575,000. These start-up grants are one per CDS code and the charter would not be eligible for all three. SCOE therefore needed to adjust revenue to remove the \$200,000 and \$150,000 grants.

- 3. The charter would not be eligible for Federal Title 1, 2, and 3 funding until the second year, based on the prior pupil counts. Revenue would need to be reduced as follows:
  - Year One \$48,882
  - Year Two \$36,892
  - Year Three \$42,657
- 4. Federal Special Education Entitlement was included in 2016/17 and 2017/18. Petitioner properly assumed that the federal funding would be delayed for a year and did not include revenue in 2015/16. Petitioner used 2016/17 and 2017/18 pupil counts in their estimates. The federal funding is a year behind and it uses the previous year pupil counts. Therefore, funding would need to be reduced by \$19,550 in 2016/17 and \$22,825 in 2017/18.
- 5. A mathematical error was made in the calculation of support salaries in 2016/17 and 2017/18. Page 4 of the budget assumptions has the Coordinator of Data Systems at \$65,000 and the Coordinator of Technology at \$55,000 (or \$27,500 for ½ of an FTE). The Coordinator of Data Systems does not start until 2016/17. It appears that the budget calculates the Coordinator of Data Systems at \$55,000 instead of \$65,000. SCOE adjusted the expenditure to correct the error in 2016/17 by \$10,000 and \$10,200 in 2017/18 using Petitioner's method of applying a 2% increase.
- 6. Pages 126-130 of the petition discuss duties of a site Testing Coordinator and a Chief Accountability Officer that are not included in the budget. Assuming both are part-time, an approximate salary and benefit would increase expenditures by \$60,000 for each of the three years.
- A mathematical error was made in totaling costs in the 4000 object codes in 2015/16, 2016/17, and 2017/18. This error overestimates expenditures. SCOE therefore reduced expenditures as follows:
  - Year One \$5,500
  - Year Two \$12,000
  - Year Three \$12,000
- In the correspondence between SJUSD and Paramount Collegiate Academy dated September 24, 2014, #44, the petition describes the lunch program revenue as 101.65 ADA for Free/Reduced lunches and 98.36 Paid lunches.

With the assumption of serving 200 lunches per day in Year One, the revenue Petitioner projects is reasonable. However, as Petitioner did not include expenditures for all 200 lunches, the expenditures would need to increase as follows:

- Year One \$37,000
- Year Two \$75,000
- Year Three \$123,000
- 9. As a member of an outside Special Education Local Plan Area (SELPA), the charter would be responsible for 100% of their special education costs. While Petitioner did budget for a Resource Teacher and for special education services in contracting, they did not budget enough to cover even the least expensive services. Special education expenditures would need to increase as follows:
  - Year One \$204,000
  - Year Two \$417,000
  - Year Three \$674,000

This is a minimum. If the charter received just one student who needed more intense services, the cost would increase significantly.

- 10. Petitioner has included multiple budget scenarios depending on the possible facility options. As they have not yet acquired a facility from SJUSD and SJUSD would only be required to provide a Proposition 39 facility to accommodate Petitioner's projected in-district average daily attendance of 90.7, SCOE is making the assumption they will rent a facility (Petitioner's Budget Scenario #2). The amount included in the budget for rental of a facility is reasonable. However, it does not include Tenant Improvements (TI) on a facility. Assuming a very inexpensive TI with very flexible lease arrangements that allow for lease expansion only as space is needed, SCOE estimates the additional costs would be a minimum increase to expenditures of the following<sup>1</sup>:
  - Year One \$210,000
  - Year Two \$157,500
  - Year Three \$183,750

<sup>&</sup>lt;sup>1</sup> Facilities are further discussed in section II.C. below.

Based on the items discussed above, at a minimum, the budget should be adjusted as follows:

#### Paramount Collegiate Academy (PCA) Budget Scenario #2 used as starting point

Revenue (Per PCA Scenario #2)	Start-up	2015/16	2016/17	2017/18
LCFF Property Taxes		1,424,808 155,520	2,551,571 272,160	3,923,578 408,240
Federal Revenue	225,000	389,576	544,819	611,384
State Revenue Revenue Per Petition	225,000	115,296 2,085,200	208,019 3,576,569	312,028 5,255,230
<u>Adjustments</u>				
Property Taxes (#1)		(155,520)	(272,160)	(408,240
Start-up Grant (#2)		(200,000)	(150,000)	
Title 1, 2, 3 (#3)		(48,882)	(36,892)	(42,657
Federal Special Ed (#4) Adjusted Revenue	225,000	1,680,798 1,880,798	(19,550) 3,097,967 3,247,967	<u>(22,825</u> <u>4,781,50</u>
Expenditures (Per PCA Scenario #2)				
Certificated Salaries	50,000	636,900	936,054	1,308,61
Classified Salaries		152,500	210,550	214,76
Benefits	7,088	234,204	395,009	590,78
Books and Supplies	127,040	211,198	354,893	546,91
Services		408,737	619,604	890,14
Capital Outlay	24,875		31,446	31,44
Oversight Fee		14,248	25,516	39,23
Expenditures Per Petition	209,003	1,657,787	2,573,072	3,621,89

Adjustments Coordinator Correction (#5) Testing Coordinator/			10,000	10,200
CAO (#6)		60,000	60,000	60,000
Math Error (#7)		(5,500)	(12,000)	(12,000)
Lunches (#8)		37,000	75,000	123,000
Special Ed (#9)		204,000	417,000	674,000
TI (#10) Adjusted Expenditures	209,003	<u>210,000</u> <u>2,163,287</u>	<u>157,500</u> <u>3,280,572</u>	183,750 4,660,848
Net Income Fund Balance	15,997 15,997	(482,489) (282,489) (466,492) (266,492)	(182,605) (32,605) (649,097) (299,097)	120,660 (528,437) (178,437)

# - indicates the narrative item that corresponds to the adjustment

As noted above, these estimated shortfalls will increase significantly if the charter does not begin each school year with Petitioner's projected enrollment figures and 96% attendance.

#### **B. ADMINISTRATIVE PLAN**

The petition indicates the charter will provide or procure most of its own administrative services and that these will be in place by the beginning of staff employment in the spring/summer of 2015. When appropriate, Petitioner will contract with qualified outside providers to provide administrative services as necessary.

#### C. FACILITIES PLAN

#### Potential Facility Location(s)

Petitioner has requested a school facility from SJUSD under Education Code section 47614 (Proposition 39). Petitioner identified SJUSD's Creekside School, located at 2641 Kent Avenue, Sacramento, CA 95821 as a desired site. The petition does not identify an alternate site for either a commercial lease or an existing district school site.

Under Education Code section 47614, SJUSD would only be required to provide a facility to accommodate Petitioner's projected in-district average daily attendance (ADA). Petitioner projects its in-district ADA at 90.7 the first year. (Section 5, Proposition 39 Facility Request.) Petitioner projects total student enrollment of 200 students (192 ADA) in Year One, 350 students in Year Two, 525 students in Year Three, and 875 students in Year Seven. Therefore, even if SJUSD provides a facility in Year One to accommodate in-district students (90.7 ADA/94.5 enrolled), it is unclear what facilities Petitioner would use for the

#### Teresa Stinson

From:

Linda Bessire < linda.bessire@sanjuan.edu>

Sent:

Thursday, February 12, 2015 12:19 PM

To:

Teresa Stinson

Cc:

Linda Simlick; Katie Fabel Recent incident with PCA

Subject: Attachments:

Redacted form distributed by PCA.pdf

Hello Teresa:

The purpose of this email is to provide you with information, as SCOE processes the Paramount Collegiate Academy (PCA) charter school petition appeal, about our school district's recent experience this week with PCA Director Dawn Contreras-Douglas and several PCA supporters. This information may provide you with further context into the potential operations and success of PCA.

On Tuesday, February 10, the principal of Sylan Middle School reported that Director Dawn Contreras-Douglas and several PCA supporters were on campus at school dismissal time passing out the attached application, informing parents that Sylvan was closing at the end of this school year and that they would need to find a new school for their students. The principal told Ms. Contreras-Douglas and the PCA supporters that this is not true and that they had to leave the school campus and move to the sidewalk area.

She spoke to Ms. Contreras-Douglas several times asking her to leave before she finally left. Ms. Contreras-Douglas would not give the principal a copy of what was being distributed. As soon as the principal went inside the school to start a staff meeting, the PCA group came back on school campus and had to be asked to leave again by a school campus monitor.

The attached application form was brought into the school by a parent who speaks English as a second language who thought she had to complete this form. Sylvan Middle Schools staff explained the situation to the parent. On Wednesday, February 11, the principal reported "many parents" called with concerns about statements made by the PCA group.

Please let me know if you have any questions.

Thank you,

Linda

Linda Bessire, Ed.D. Director, Pupil Personnel Services San Juan Unified School District Office number: (916) 971-7220

### Paramount Collegiate Academy Charter School Intent to Re/Enroll Form for Purposes of Requesting Facilities

Dear Current and Potential Paramount Collegiate Academy Charter School Parents/Guardians:

Under California law (i.e., Proposition 39) the San Juan Unified School District must provide Paramount Collegiate Academy Charter School reasonably equivalent school facilities in which to operate the charter school. This Form may be used to support the Charter School's request for facilities. By submitting this Form, you are indicating that you are meaningfully interested in enrolling or re-enrolling (as applicable) your child/children in the Charter School's classroom-based program during the 2015-16 school year. Thank you very much for your support and cooperation!

Student #1:		
Name:		Grade in 2015-18:
Last, First, Middle Home Address;		
CHAIR STATE OF THE		
Street City, State Zip		
Home Phone	Age:	_ Date of Birth:
Resident of San Juan Unifie	d School District? Y/N	nool student? Y/N (circle one) circle one) son/daughter would otherwise attend:
Student #2:		
Name:		Grade in 2015-16:
Last, First, Middle Home Address:		
Street City, State Zip		
Home Phone:	Age:	_ Date of Birth:
Current Paramount Collegia Resident of San Juan Unifie If yes, please list the district Parent/Legal Guardian Infor	d School District? Y/N t school you would other	nool student? Y/N (circle one)
Perent/Legal Guardian Name	•	
Lest, First, Middle Home Address:		
Street City, State Zip		
Home Phone:	Email:	
ow I am indicating that I am mas	ningfully interested in fre-enr	obing/enrolling) the above named child(ren) in Paramount C ng this Form does not guarantee enrollment in the Charler S ad School District to support the Charter School's request for

IMPORTANTII Beturn by mail: 3510 Hazeltine Lane Roseville, CA 95747 or email to: dcdouglas@pcaeducation.org

### PARAMOUNT COLLEGIATE ACADEMY

Petitioners' Response to Sacramento County Office of Education's Staff Recommended Findings

Submitted to the Sacramento County Office of Education Board of Education Trustees February 17, 2015

#### INTRODUCTION

The Board of Directors and Development Team of Paramount Collegiate Academy (PCA) express great appreciation and high regard for the countless hours of work associated with the Sacramento County Office of Education (SCOE) Staff's review of PCA's Petition and ancillary documents. Petitioners realize SCOE staff conducted a very careful and thorough review of the PCA Petition Appeal and Ancillary Documents and this is supported by the high caliber of detailed feedback provided.

Over these past 7 months, Petitioners submitted their original charter petition to San Juan Unified School District (SJUSD) on 8/29/14 and subsequent petition appeal to SCOE on 12/17/14. Both the charter petition and multi-year budgets meet all requirements of charter school law 47605 et seg and budgets are fiscally sound. During this extended period, the education landscape has continued to change. SJUSD's Board of Education approved its First Interim Budget for 2014-15 on 12/17/14, with an increased Local Control Funding Formula (LCFF) Revenue Funding Average of \$7,347/ADA. This increases PCA's multiyear budget projections by providing an increase to PCA's LCFF revenues. The federal government also increased the Federal Child Nutrition Program's reimbursement rates for school breakfast/lunch programs. This further increases the Charter's projected revenues. The Governor's recent Proposed Budget for 2015/16 supports further substantial increases in education funding in California, including large increases for charter school programs. Lastly, Petitioners are finalizing their 2014/15 application submission to the California School Finance Authority (CSFA) for a Charter School Revolving Loan Fund (CSRLF). CSFA's first priority for the CSRLF program is to fund new charter schools. The CSRFL is included in Budget Scenario 3 and the Budget Narrative page 3 (both presented to SJUSD and SCOE on appeal). Over the past several years, CSFA's funding priority has been demonstrated in funding all new charter school applications as well as funding the maximum loan amount of \$250,000. Petitioners carefully considered all staff recommendations and are presenting additional Multiyear Budget Scenarios A and B that support all original financial plans, including the Charter's expansion plan. These additional multiyear budgets reflect more conservative enrollment increases in Years 2 and beyond. These documents are attached in Sections 2 and 3 herein.

Petitioners understand if PCA's Charter is approved or conditionally approved, SCOE will be authorizing its first direct-funded charter school on appeal. Petitioners hope the responses and additional information included herein, bring greater clarity and understanding in charter school funding and program(s), as the county office moves forward in changing education territory, increasing its network of collaborative partnerships and increasing its capacity to help eliminate the achievement gap, for the betterment of adequately educating every child in this 21st century.

# Petitioners' Responses to SCOE Staff Recommended Findings

- SCOE Staff Recommended Findings, verbatim, are in black
- PCA Petitioners' Responses to Staff Recommended Findings are in orange

#### "ANALYSIS OF PETITION AND RECOMMENDED FINDINGS OF FACT"

"This analysis will review each area specified in Education Code section 47605, the applicable requirements of Title 5 of the California Code of Regulations sections 11967 and 11967.5.1, and County Board Policy and Administrative Rules and Regulations on Charter School Petitions (BP 2400 and ARR 2400). These sections are enclosed for convenient reference. Copies of BP 2400 and ARR 2400 were provided to Petitioner."

#### "I. TECHNICAL REQUIREMENTS"

"The petition is well organized. As required, Paramount Collegiate Academy has provided a copy of the charter petition as denied by the school district, a copy of the school district governing board's action of denial of the petition, the factual findings specific to the petition, a revised petition that includes changes that Petitioner believes are necessary to reflect the County Board as the chartering entity, and a certification of compliance with applicable law."

#### "II. FINANCIAL AND OPERATIONAL ANALYSIS"

"Under Education Code section 47605(b)(2), the County Board may deny a charter appeal if Petitioner is "demonstrably unlikely to successfully implement the program set forth in the petition." One of the most crucial elements in assuring that the charter school program can be successfully implemented, along with competent staff, is a realistic financial and operational plan. (5 Cal. Code Regs., § 11967.5.1(c)(3).) "

"A charter petition's financial and operational plan is not realistic when it does not adequately: (1) include reasonable estimates of all anticipated revenues and expenditures necessary to operate the school, including special education; VIII.D.7. (2) present a budget that in its totality appears viable and, over a period of no less than two years of operation, provides for the amassing of a reserve equivalent to that required by law for a school district of similar size; (3) demonstrate the necessary background or understanding of school finance and business management critical to the charter school's success, or a plan to secure the services of individuals with the necessary background; or (4) reflect reasonable costs for the acquisition or leasing of facilities, taking into account the facilities the charter may be allocated under Education Code section 47614. (5 Cal. Code Regs., § 11967.5.1(c)(3)(B), (c)(3)(D), (c)(4).)"

#### "A. FINANCIAL ANALYSIS"

"In general, the budget assumptions were well thought out and in many cases, conservative. However, there were many areas where a clear understanding of school financing was lacking, which required that SCOE make large adjustments to the budget. Because the adjustments went in both directions, sometimes helping and sometimes hurting the bottom line, a complete budget summary is included at the end of this analysis. In short, necessary budget revisions result in negative fund balances in the first three years of operation of at least: 2015/16 (\$466,492) 2016/17 (\$649,097) 2017/18 (\$528,437)" SCOE staff performed a thorough and careful financial analysis, however Petitioners discovered several assumption errors related to charter school funding that were problematic throughout this financial analysis.

Petitioners are partnering with the nation's leading charter school back office financial services provider, Charter School Management Corporation (CSMI), who, in addition to the California Charter Schools Association are working with the Petitioners to provide back office and budgetary support during start up and implementation of the Charter School.

New charter schools' Local Control Funding Formula (LCFF) is determined by the base rate of the local district (SJUSD). As such, Petitioners have included alternate multiyear budgets to reflect increased Local Control Funding Formula (LCFF) Revenue Funding Average of \$7,347/ADA noted in SJUSD's Board Approved First Interim Budget for 2014-15. This increases PCA's multiyear budget projections by providing an increase to PCA's LCFF revenues. Additionally, the federal government increased the Federal Child Nutrition Program's reimbursement rates for school breakfast/lunch programs. This further increases the Charter's projected revenues. Lastly, Petitioners are finalizing their 2014/15 application submission to the California School Finance Authority (CSFA) for a Charter School Revolving Loan Fund (CSRLF). CSFA's first priority is to fund new charter schools. Over the past several years, this funding priority has been demonstrated in funding all applications from new charter schools as well as funding the maximum loan amount of \$250,000.

"More problematic, these shortfalls will grow if the charter does not begin with 200 students enrolled on the first day of school who attend 96% of the time in Year One. Petitioner's budget is based upon very aggressive growth schedules of 350 students enrolled in Year Two and 525 students enrolled in Year Three. The above shortfalls would increase significantly should Petitioner not begin each year with the projected attendance." Petitioners initially modified their expansion plan and presented it to SJUSD on 11/7/14. This plan was provided to SCOE on 12/17/14 in appeal documents. This expansion plan is reflected in the alternate Multiyear Budgets and Budget Narratives included in Sections 2 and 3. Projected enrollment numbers were adjusted for more

conservative build out in Year Two (2) through Year Eleven (11). The following is the alternate expansion plan:

Student								
Population	1							
	Grade	TOTAL						
	6	7	8	9	10	11	12	
Year 1	50	50	50	50				200
Year 2	75	50	50	50	50			275
Year 3	75	75	50	50	50	50		350
Year 4	75	75	75	50	50	50	50	425
Year 5	100	75	75	75	50	50	50	475
Year 6	100	100	75	75	75	50	50	525
Year 7	100	100	100	75	75	75	50	575
Year 8	100	100	100	100	75	75	75	625
Year 9	100	100	100	100	100	75	75	650
Year 10	100	100	100	100	100	100	75	675
Year 11	100	100	100	100	100	100	100	700

<sup>&</sup>quot;Adjustments to Petitioner's budget are as follows:"

"1. Revenues included a line item for Transfer of Charter Schools in Lieu of Property Taxes. First, a county office would not make a property tax transfer. Second, if SJUSD had approved this charter, this revenue was not applied properly to the Local Control Funding Formula (LCFF) entitlement. In either scenario, there is no additional money for a property tax transfer. For every dollar received in property taxes, a dollar is deducted from the state, making the net impact \$0. Therefore, revenue is overestimated as follows: Year One – \$155,520 Year Two – \$272,160 Year Three – \$408,240"

This finding does not align with charter school funding formulas. The following statutes explain circumstances for the distribution of property tax transfers to public charter schools. Education Code, Title 2 of the Elementary and Secondary Education Act [33000-64100], Title 2 enacted by Stats. 1976, Ch. 1010, Division 4. Instruction and Services [46000-64100] Division 4 enacted by Stats. 1976, Ch. 1010 Part 26.8. Charter Schools [47600-47664] Part 26.8 added by Stats. 1992, Ch. 781, Sec. 1. Chapter 6. Funding (Chapter 6 added by Stats. 1999, Ch. 78, Sec. 32.8.) CHAPTER 6. Funding [47630 – 47664] (Chapter 6 added by Stats. 1999, Ch. 78, Sec. 32.8.) ARTICLE 2. Charter School Block Grant [47633 - 47635] (Article 2 added by Stats. 1999, Ch. 78, Sec. 32.8.) Despite this inaccurate conclusion, Petitioners developed 2 additional Multiyear Budget Scenarios A and B without the inclusion of In Lieu Property Taxes. See Attached Section 2. All five budget scenarios demonstrate healthy positive budgets and budget reserves well above requirements for the first 3 years of the Charter's operation.

"2. Federal Revenue includes start-up grants for \$225,000 in the current year, \$200,000 in 2015/16, and \$150,000 in 2016/17. When we first contacted the California Department of Education's (CDE) Charter School Division, CDE

said that Petitioner would not receive grants in each of the three years.

When we contacted CDE again recently, the Interim Director of CDE's
Charter School Division informed us that Petitioner may be eligible for
\$575,000 over three years, but could not specifically verify that Petitioner
will receive this amount. Because of this ambiguity, we have given
Petitioner the benefit of the doubt and credited the full \$575,000. These
start-up grants are one per CDS code and the charter would not be eligible for all
three. SCOE therefore needed to adjust revenue to remove the \$200,000 and
\$150,000 grants."

Petitioners realize and appreciate the expediency with which SCOE staff corrected this error. Petitioners were provided with this revision on Saturday, 2/14/15. However, this inaccuracy connotes an unclear understanding of charter school funding.

Petitioners were notified on 10/22/14 they passed the highly stringent Peer Review for the Federal Public Charter School Grant Program (PCSGP) and will receive funding in the amount of \$575,000 upon authorization. The PCSGP is a 3-Year federal grant awarded for start-up and implementation of new charter schools. The <u>original 3 budgets and additional multi-year Budget Scenarios A and B attached in Section 2</u> demonstrate these revenue receipts.

"3. The charter would not be eligible for Federal Title 1, 2, and 3 funding until the second year, based on the prior pupil counts. Revenue would need to be reduced as follows: Year One – \$48,882 Year Two – \$36,892 Year Three – \$42.657"

This finding is inconsistent with Federal Title I regulation, which took effect in 2013/14. The U.S. Department of Education recognizes how important it is for new charter schools to get their share of Title I funding needed to serve disadvantaged students and issued a guidance letter to all Title I Directors across the country on 9/23/13. The letter provided further clarification of Title I Nonregulatory Guidance for Charter Schools concerning the manner in which Title I funds should be distributed to new charter schools. The guidance ensures that federal "hold-harmless" provisions are carried out so charter schools are not disadvantaged. See Attached Sections 4 and 5 for a copy of this federal letter and Title I Nonregulatory Guidance for Charter Schools.

Petitioners plan to file a Local Education Area Plan (LEAP) with the state department of education at the beginning of the 2015 school year to receive Title I funding in Year 1. These funds were included in all original and additional <u>Budget Scenarios A and B of attached Section 2.</u>

Federal Special Education Entitlement was included in 2016/17 and 2017/18.

Petitioner properly assumed that the federal funding would be delayed for a year and did not include revenue in 2015/16. Petitioner used 2016/17 and 2017/18 pupil counts in their estimates. The federal funding is a year behind and it uses the previous year pupil counts. Therefore, funding would need to be reduced by \$19,550 in 2016/17 and \$22,825 in 2017/18."

Petitioners have provided additional Budgets A and B with enrollment/ADA pupil counts that align with an alternative expansion plan. Consequently, the Federal Special Education Entitlements in years 2016/17 and 17/18 reflect the previous year pupil counts and new enrollment/ADA numbers.

- "5. A mathematical error was made in the calculation of support salaries in 2016/17 and 2017/18. Page 4 of the budget assumptions has the Coordinator of Data Systems at \$65,000 and the Coordinator of Technology at \$55,000 (or \$27,500 for ½ of an FTE). The Coordinator of Data Systems does not start until 2016/17. It appears that the budget calculates the Coordinator of Data Systems at \$55,000 instead of \$65,000. SCOE adjusted the expenditure to correct the error in 2016/17 by \$10,000 and \$10,200 in 2017/18 using Petitioner's method of applying a 2% increase."
  To continue practicing good stewardship and conservative spending of public funds, Petitioners combined the Coordinator of Data Systems and Coordinator of Technology positions into one position, half-time in Year 1 and full-time in Year 2 and 3. The annual salary for the position is \$65,000. This is based upon Petitioners' alternative expansion plan and reflected in the attached Budget Scenarios A and B of Section 2.
- "6. Pages 126-130 of the petition discuss duties of a site Testing Coordinator and a Chief Accountability Officer that are not included in the budget. Assuming both are part-time, an approximate salary and benefit would increase expenditures by \$60,000 for each of the three years." SCOE staff made an assumption that the site Testing Coordinator and Chief Accountability Officer would be separate paid positions. This is problematic, as Petitioners do not believe it prudent or wise to use public funds to create a full-time salary position for a site Testing Coordinator for intermittent duties, typically assumed by site lead teachers or administrators in charter schools. Testing oversight and responsibility referred to in this statement by SCOE staff will be shared across certificated staff and administration, including the Charter's Coordinator of Technology. Therefore, these positions are intentionally not listed in the petition as additional paid staff positions are not included in the budget. As PCA expands beyond Year 3 of operations, other salaried positions will be added in normal response to expanding enrollment/ADA.
- "7. A mathematical error was made in totaling costs in the 4000 object codes in 2015/16, 2016/17, and 2017/18. This error overestimates expenditures. SCOE therefore reduced expenditures as follows: Year One \$5,500 Year Two \$12,000 Year Three \$12,000"

Petitioners provided an alternative Charter expansion plan for more conservative build out. This resulted in <u>all budget expenditures being adjusted</u> to reflect the conservative pupil enrollment/ADA in Years 2 and 3.

"8. In the correspondence between SJUSD and Paramount Collegiate Academy dated September 24, 2014, #44, the petition describes the lunch program revenue as 101.65 ADA for Free/Reduced lunches and 98.36 Paid lunches. With the assumption of serving 200 lunches per day in Year One, the revenue Petitioner projects is reasonable. However, as Petitioner did not include expenditures for all 200 lunches, the expenditures would need to increase as follows: Year One – \$37,000 Year Two – \$75,000 Year Three – \$123,000" This finding is inconsistent with Petitioners assumptions for the school lunch program. Petitioners included expenditures for all lunches, paid and free/reduced, in their original budget calculations.

Due to new National School Lunch Program reimbursement rates, the Charter's initial submission on 8/29/14 as well as the Petitioners' alternative expansion plan with more conservative enrollment/ADA numbers, include new lunch program revenues and expenditures in Multiyear Budget Scenarios A and B of Section 2. The following Student Food Services cost were included in the alternative budget: Year 1-\$79, 660; Year 2-\$109,903; Year 3-\$138,877. A table of new reimbursement rates as well as all breakfast/lunch calculations are included in the alternative Budget Narrative of Section 3.

"9. As a member of an outside Special Education Local Plan Area (SELPA), the charter would be responsible for 100% of their special education costs. While Petitioner did budget for a Resource Teacher and for special education services in contracting, they did not budget enough to cover even the least expensive services. Special education expenditures would need to increase as follows: • Year One – \$204,000 • Year Two – \$417,000 • Year Three – \$674,000"

"This is a minimum. If the charter received just one student who needed more intense services, the cost would increase significantly."

Petitioners understand operating as their own Local Education Agency (LEA) for special education services involves providing 100% of services for its students with special needs. In preparation for start-up, PCA's Development Team has proactively developed a collaborative partnership with other charter schools in the vicinity of PCA's proposed target area. PCA is currently working with nearby ASPIRE-Alexander Twilight charter school to develop shared special education services, equipment, and materials, thereby significantly reducing costs associated with providing services such as low incidence cases, testing, etc. PCA is also working to promote this network of collaboration with other charter and private

schools in Arden Arcade such as Carden School of Sacramento, Town and Country Lutheran School and California Montessori Project. See attached PCA Plan for Special Education Services in Section 5.

In the event that Petitioners' do not have shared special education services agreements in place prior to 9/15, alternative Budgets A and B have the following cash reserves, well above the special education increases SCOE staff projected in this recommended finding: Cash Reserves (Budget A) Year 1-\$679,087; Year 2-\$955,124; Year 3-\$1,761,422; Cash Reserves (Budget B) Year 1-\$482,537; Year 2-\$808,574; Year 3-\$1,664,872.

Petitioners submitted their charter petition to the county office of education on appeal. As such, the charter program outlined in the original petition required the Charter to operate as an "LEA" rather than a "school of the district" for the purposes of providing special education services. This change of authorizer necessitated that Petitioners modify their special education program. Petitioners have submitted the PCA Special Education Services Plan in Section 6 as supporting documentation for this program change.

"10. Petitioner has included multiple budget scenarios depending on the possible facility options. As they have not yet acquired a facility from SJUSD and SJUSD would only be required to provide a Proposition 39 facility to accommodate Petitioner's projected in-district average daily attendance of 90.7, SCOE is making the assumption they will rent a facility (Petitioner's Budget Scenario #2). The amount included in the budget for rental of a facility is reasonable. However, it does not include Tenant Improvements (TI) on a facility. Assuming a very inexpensive TI with very flexible lease arrangements that allow for lease expansion only as space is needed, SCOE estimates the additional costs would be a minimum increase to expenditures of the following: • Year One – \$210,000 • Year Two – \$157,500 • Year Three - \$183,750 · Facilities are further discussed in section II.C."

This finding is problematic as it does not explain how these 3-year estimates were derived and it does not reflect actual lease structures developed for charter school projects, which typically include Tenant Improvements (Tis) within lease agreements.

PCA is working with a professional commercial broker of Newmark, Cornish, and Carey and have located 4 non-district facility options for lease in the Arden Arcade target area, 1 on Eastern Avenue, 2 on Butano Drive, and 1 on Marconi Avenue.

"As noted above, these estimated shortfalls will increase significantly if the charter does not begin each school year with Petitioner's projected enrollment figures and 96% attendance."

Petitioners' alternate expansion plan was submitted to SJUSD on 11/7/14. This plan was provided to SCOE on 12/17/14 in appeal documents. This

alternate expansion is reflected in the Alternative Multiyear Budgets and Budget Narrative included in Sections 2 and 3. Projected enrollment numbers were provided for conservative build out in Year Two (2) through Year Eleven (11).

#### "B. ADMINISTRATIVE PLAN"

"The petition indicates the charter will provide or procure most of its own administrative services and that these will be in place by the beginning of staff employment in the spring/summer of 2015. When appropriate, Petitioner will contract with qualified outside providers to provide administrative services as necessary."

Petitioners are working with the national Charter School Management Corporation (CSMI) during start up, implementation, and beyond in order to provide seamless administrative services.

#### "C. FACILITIES PLAN"

#### "Potential Facility Location(s)"

"Petitioner has requested a school facility from SJUSD under Education Code section 47614 (Proposition 39). Petitioner identified SJUSD's Creekside School, located at 2641 Kent Avenue, Sacramento, CA 95821 as a desired site. The petition does not identify an alternate site for either a commercial lease or an existing district school site."

"Under Education Code section 47614, SJUSD would only be required to provide a facility to accommodate Petitioner's projected in-district average daily attendance (ADA). Petitioner projects its in-district ADA at 90.7 the first year. (Section 5, Proposition 39 Facility Request.) Petitioner projects total student enrollment of 200 students (192 ADA) in Year One, 350 students in Year Two, 525 students in Year Three, and 875 students in Year Seven. Therefore, even if SJUSD provides a facility in Year One to accommodate in-district students (90.7 ADA/94.5 enrolled), it is unclear what facilities Petitioner would use for the remaining out-of-district students (101.3 ADA/105.5 enrolled) in Year One or for increasing numbers of out-of-district students in future years."

While the District is only legally bound to provide facility space to accommodate the number of in-district students, there is nothing prohibiting the District from providing additional space under a Proposition 39 or lease agreement for additional space, if available. In addition to the pursuit of facilities under Proposition 39, Petitioners are working with commercial brokerage firm Newmark, Cornish, and Carey and have located 4 non-district facility options for lease in the Arden Arcade target area, 1 on Eastern Avenue, 2 on Butano Drive, and 1 on Marconi Avenue.

Alternate enrollment/ADA numbers are in the alternative expansion plan included in the Alternative Budget Narrative in Section 3. Newmark, Cornish and Carey are aware of all projected ADA numbers and facility needs.

#### "Facility Space"

"Facility size is estimated using a bench mark of 70 square feet per student.

Based upon Petitioner's projected enrollment figures, the corresponding square footage using the petition's bench mark of 70 square feet per student requires a facility size of 14,000 square feet for Year One, with expansion capacity each year through Year Seven to 61,250 square feet."

Newmark, Cornish, and Carey are aware of Petitioners' projected enrollment needs and are working with Petitioners to acquire an alternative non-district facility to accommodate Petitioners' needed facility space in Year 1 and beyond.

#### "Costs for Facility Acquisition or Leasing"

"The petition provides three budget scenarios. Scenario One assumes the charter will acquire a district-owned facility under Proposition 39. Scenarios Two and Three include costs for a commercial lease of a facility at \$1.25 per square feet per month. Scenario One estimates a facility fee due to district/COE of 3% of actuals. Recurring monthly costs for utilities and custodial services are also provided. There are no costs budgeted or identified for facility improvements or for ongoing maintenance of the facility."

This statement is problematic as it does not reflect actual lease structures developed for charter school projects, which typically include facility improvements and ongoing maintenance within lease agreements, paid contractually by the landlord.

#### "Summary"

"The petition discusses the type, size, and costs for the school facility in very general terms. Specific number of classrooms, types of rooms, and sizes are not discussed. Applying the petition's stated goal of a 25:1 student-to-teacher ratio and the cited benchmark of 70 square feet per student, the number of classrooms needed will range from eight (8) in Year One, 14 in Year Two, 21 in Year Three, with a possible need for 28 classrooms at full build out in Year Seven. The total square footage is estimated at 14,000 square feet for Year One, 24,500 square feet for Year Two, 36,750 square feet for Year Three, and 61,250 square feet at full build out in Year Seven." This finding incorrectly represents the Petitioners' school facility requests. In addition to the required description of facility needs included in the Charter Petition on page 199, Petitioners' provided additional details of facility needs in their Proposition 39 Facility Request to SJUSD on 10/31/14, which included needing individual classrooms to accommodate first-year projected enrollment of 200 students, multi-use rooms, lunch/breakfast rooms, student bathrooms, faculty restrooms, office space, staff workrooms, outdoor recreational and sports areas, and parking for staff, parents and community visitors. Additionally Petitioners stated that PCA will operate grade levels 6 through 9 on one contiguous school site in Year One, adding grades 10, 11, and 12 in subsequent operational years. Petitioners also explained that daily instruction will occur at the school site for approximately 500 minutes each day, five days per week. Petitioners' facility request also explained that PCA will operate various parent

and community programs during evening hours such as continuing parent education workshops. Lastly Petitioners noted that weekends, holidays, and student non-attendance days will involve staff professional development inservices, workshops, and trainings as well as fundraising events and enrichment programs. Consequently, Petitioners provided a full explanation of facility needs for operating an educational program from a single contiguous school. A copy of this facility request was included in Petitioners' appeal documents submitted to SCOE on 12/17/14.

"The desired site of Creekside School was built in 1953 as an elementary school. Details concerning availability, condition, size, number of classrooms, and overall condition of the school are not provided in the petition. The long term suitability of Creekside School as a STEAM middle and high school is questionable. A typical elementary school built in last mid-century does not provide the room capacity or infrastructure needed for a modern science and technology-based curriculum in a middle and high school setting. The estimated cost of a modernization to provide needed improvements ranges from several hundreds of thousands of dollars to well over one million dollars. Budget Scenario One does not contain a line item for any necessary improvements to the school, nor does it include rent or improvements for the facility space needed for the projected (105.5 enrolled/ 101.3 ADA) out-of-district students." This statement is incorrect. As described earlier, Petitioners outlined specific facility needs on petition page 199 and further detailed facility needs in a formal Proposition 39 facility request submitted to SJUSD on 10/31/14. SCOE staff received the petition and copy of the facility request on 12/17/14. Additionally, this assumption does not consider modern mobile technology systems, which are cloud based. PCA will be utilizing this technologies which are far-less expensive than traditional stationary systems. The Proposition 39 facility proposal from SJUSD includes a very old elementary school campus, La Entrada, built in 1952, but converted by SJUSD to a continuation high school, demonstrating that utilization of an elementary campus for secondary school programs is a reasonable conversion.

Lastly, this statement lacks understanding of charter school facility projects in that lease agreements are created and oftentimes include upgrades and tenant improvements paid by the landlord, as stipulated in the lease agreement.

"Budget Scenarios Two and Three contain budget entries for a commercial lease. The cost per square foot, \$1.25/month, is cited as a current average for Sacramento and Placer counties. The location, type of lease, and type of building is not stated. The actual cost of the lease could be significantly greater than the \$1.25 estimate depending upon details of the lease contract, including any required upfront tenant improvements, ongoing tenant maintenance, capitol repairs, and common area maintenance (CAM) costs."

As stated previously, this statement indicates a lack of understanding for charter school budgets and facility leasing for charter schools. As discussed earlier, Petitioners clearly outlined their target area location and facility/building needs in

their petition and their Proposition 39 facility request made to SJUSD. Newmark, Cornish, and Carey is working with the Petitioners to acquire a leased facility. This commercial brokerage firm is a leader in their field and have already located several properties that fall within the School's target area and budget. Additionally, this brokerage firm is working to develop a lease agreement that includes tenant improvements and repairs to be paid by the owners, which is typical for charter schools.

"Typically, a leased facility requires some level of tenant improvement.

The petition does not contain a budget for these improvements. The cost of a modest improvement under a commercial lease may be estimated at around \$15.00 per square feet; resulting in first year tenant improvement cost of \$210,000, second year \$157,500, and third year \$183,750."

This statement is inaccurate and does not explain where the \$15.00/square foot calculation(s) were derived, making the monetary figures suspect. As stated previously, Petitioners are working with Newmark, Cornish, and Carey, leaders in commercial property brokerage among charter schools and the firm typically arranges lease agreements that include Tls, maintenance, and upgrades paid by the owner/landlord.

"In summary, the petition does not provide adequate information to determine that Petitioner has addressed the requirements of the school facility, the suitability of the desired site (Creekside School) for the 90.7 ADA in-district students, or the availability of an alternate site. The budget scenarios presented do not budget for typical required improvements or ongoing maintenance of a school site."

This demonstrates an unclear understanding of the charter school facility acquisition process, including commercial facility tenant agreements, what facility descriptions are included in a charter petition and what facility descriptions and information are contained in a Proposition 39 Facility Request.

Petitioners met with SJUSD Superintendent Kern on 10/14/14, to explain PCA's desire for the Creekside campus. Mr. Kern referred Petitioners to the District's Director of Facilities to do a walkthrough of the Creekside campus. A request for a walkthrough of Creekside on 10/16/14 was ignored as well as a follow-up request on 10/20/14. On 10/31/14, Petitioners submitted a formal Proposition 39 Facility Request to SJUSD, requesting the Creekside School campus at 2641 Kent Avenue, Sacramento, CA 95821. The District provided no response by the 12/1/14 deadline. Petitioners received a Proposition 39 Facility Proposal for a portion of the La Entrada campus from SJUSD on 1/30/15. Despite, SJUSD's lack of adequate responses to facility requests for PCA, Petitioners began working with Newmark, Cornish and Carey, Northern California's premier commercial real estate services operation. Newmark, Cornish and Carey are highly skilled in working with charter schools and they offer unparalleled access to professionals and specialists with an in-depth understanding of their respective markets. Newmark, Cornish & Carey's integrated services include consulting, project

management, leasing brokerage services and transaction management, investment sales, financial services, client solutions and tenant representation, marketing services, property and facilities management and asset management. Since partnering with Newmark, Cornish, and Carey, Petitioners have successfully located 4 alternative facilities to lease in the Arden Arcade target area, 1 on Eastern Avenue, 2 located on Butano Drive, and 1 facility on Marconi Avenue.

"Based on the lack of a realistic financial and operational plan, Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition."

Petitioners have already explained in the financial questions above where SCOE staff based their findings on inaccurate assumptions about the PCA plan and budget. During conversations with San Juan USD, Petitioners clarified the enrollment projections using a more conservative growth plan. The revenue sources and amounts included in the budget were verified and confirmed. It is understood that on appeal a petitioner may provide additional documents and appendices to explain and support their petition. Petitioners have provided additional alternative budgets utilizing the more conservative enrollment projections. In addition, the petition is enlisting the services of CSMC to provide back office and budgetary support services for the school upon approval. CSMC is the largest charter school back office financial service provider in the nation. CSMC is working with the Petitioners to provide additional financial and budget support services during start up and implementation.

#### "III. PROGRAM ANALYSIS"

"The Soundness of the Educational Program"

"The County Board may deny a charter petition when it presents an "unsound educational program for the pupils to be enrolled in the charter school." (Ed. Code, § 47605(b)(1).)"

"Petitioner's goal is to provide a college preparatory, integrated Science, Technology, Engineering, Arts, and Mathematics (STEAM) curriculum with projectbased learning, blended learning, differentiated instruction, and personal learning plans."

"The SCOE staff review found that the petition fails to present a sound educational program for students requiring special education services and English learners. For general education students, the petition presents a research-based instructional program. However, given the broad scope of intended educational practices and the lack of a detailed plan or timeline to accomplish the numerous expectations, it is unlikely that Petitioner can successfully implement all of its intended practices. Moreover, the

petition's lack of adequate measurable pupil outcomes will prevent a full assessment of whether Petitioner's educational objectives are successfully met."

This statement demonstrates a lack of understanding of charter program law of 47605 et seq. The PCA Charter Petition was vetted by English learner, special education, curriculum/instruction, and legal experts and was found to provide all required program descriptions and elements for both special education and English learners as outlined on Petition pages 104-121 and in Education Code 47605 (b) (5) (A) (i) and (ii). Petitioners also provided additional responses regarding the Charter's program to serve students with special needs in its letters to SJUSD dated 9/22/14, 9/25/14, and 9/24/14. Copies of these letters containing elaboration of these program responses were included in the appeal documents presented to SCOE on 12/17/14.

Due to change of authorizer on appeal from District to County, Petitioners have attached copies of their special education services plan and English learner instructional master plan in Sections 6 and 7.

"More specific analysis of the educational program is included in Element A below."

#### "The Petition's Description of the 16 Required Elements"

"Under Education Code section 47605(b)(5), a petition's failure to include a reasonably comprehensive description of all 16 statutory elements is grounds for the County Board to deny a charter petition. These elements are each discussed below."

"To be "reasonably comprehensive," staff considered whether a description includes information that is substantive; that includes elaboration; that addresses all aspects of the required charter petition elements; that is specific to the charter petition being proposed; that describes the program to a sufficient degree that improves pupil learning; that increases learning opportunities for pupils of all backgrounds and abilities; that expands educational opportunities; and for which accountability and legal compliance can be reasonably foreseen and assured. Therefore, mere quoting of the law or general statements of educational practices without detailed information about how it will be accomplished by Petitioner do not suffice. (5 Cal. Code Regs., § 11967.5.1(g).)"

In considering whether to approve or deny the petition, the County Board may consider that its future oversight will be based on the charter petition itself, as the petition governs the services promised to prospective students and the relationship between the County Board and Petitioner. As such, any incomplete or legally deficient descriptions may raise concerns about the likelihood of success of the overall school program."

#### "A. Element A - Description of the Educational Program"

"1. For general education students, the petition describes a research-based instructional program."

"For students not requiring special education or English learner services, the petition describes an educational program consistent with research-based instructional practices. The key academic program is a hybrid of research-based practices combined with project-based and experiential learning and Partnership for 21st Century Skills Framework (Appendices G-K), with interdisciplinary themes of global awareness; financial, economic, business, and entrepreneurial literacy; civic literacy; health literacy; and environmental literacy integrated across the curriculum.

Petitioner intends to offer students individual learning plans, community service projects, and advanced placement courses taught through a project-based approach. Students' social and emotional development will be addressed through the Love and Logic curriculum, practices, and methodologies (Appendix M), which is an approach to behavioral management implemented in many schools across the United States since 1977."

This statement indicates an unclear understanding of Love and Logic. Love and Logic is not simply a behavioral management program, it is a nationally disseminated program for building adult/parent/child relationships and building resilience, self-esteem, and self-control in children. In addition to school curriculum, Love and Logic also consists of an equally successful parent curriculum used by social service agencies, counselors, schools, and therapists.

The Petitioners' Development Team contains a credentialed teacher who is a certified trainer in Love and Logic, currently collaborating with Dyer-Kelly Elementary School (Arden Arcade, Decile 1 School) and Court Appointed Special Advocates (CASA) of Sacramento to plan and provide Love and Logic trainings in Arden Arcade and with CASA foster parents.

"Instruction will be delivered using research-based instructional models, including independent learning, small group learning, and whole group learning (Figure 7 - Matrix of Instruction, page 56). Teachers will implement three of the four models of blended learning depending on course content and student needs (Figure 8 - Definition of Blended Learning, page 63). Instruction will be differentiated to meet the needs of students using instructional techniques of flexible grouping, ongoing assessment, and risk-taking learning environment."

"2. <u>It is unlikely that Petitioner can effectively implement all of its intended practices.</u>"

"Although each of the described programs, elements, instructional models, and instructional techniques are research-based, the large number of practices Petitioner has selected to initially implement is more than most schools implement in their first two or three years. Typically, successful schools initially focus on one or two practices. This ensures that there is adequate time for schools and teachers to effectively adopt, implement, and sustain effective practices."

Petitioners understand instructional implementations require effective adoption and frequent continuous follow up to produce fidelity. However, this SCOE statement is problematic in that it assumes low expectations for staff and, in turn, student outcomes. This statement is also incorrect since PCA's instructional program is not an attempt to use 6, 8, or 10 different instructional methodologies, but 1 methodology of interdisciplinary teaching, derived from many influences. Furthermore, this statement inaccurately connotes various professional development activities adopted in a short time frame or even a single year. The Petitioners are following a detailed staff development plan of activities implemented over 3 years. Activities specified in the professional development plan will be conducted prior to the start of the school year, while the remainder will be implemented during the school years 1, 2, and 3. Additionally, PCA's alternate block daily schedule provides over 80 minutes each day of potential professional development time built into the regular school day in addition to after school staff development and pre-service days. These numerous factors ensure that PCA's educational plan can be achieved. A copy of PCA's Professional Development Plan for 2015-2017 is attached in Section 8.

"The petition calls for full-day professional development plus weekly blocks of time for collaborative planning. In this allocated time, the petition includes the following professional development and other expectations (pages 151-152):"

- "o Love and Logic training
- o Critical Friends Group
- o Create course curriculum
- o Develop course benchmark assessments-See response regarding NWEA below
- o Participate in Rubric Development and Grading Systems training
- o Learn about Cycle of Inquiry using CFG Model
- o Serve on Student Success Teams
- o Learn about strategies to support the special populations such as special education and English learner students
- o Learn about differentiation in their specific content areas and the assessments used in their content areas
- o Learn about Sheltered Instructional Strategies, SDAIE, and/or GLAD strategies
- o Map curriculum using the instructional planning tools from Teaching 21st Century Skills
- o Collaboratively analyze student work
- o Participate in teacher learning networks
- o Participate in common collaborative/planning times."

"Schools that have effectively implemented their professional development goals have developed a comprehensive, detailed professional development calendar/timetable. There is no evidence of this type of comprehensive, detailed calendar/timetable in the petition.

As stated on page 14 of Petitioner(s)' Responses to SJUSD's Review Team & Governance Board Written Findings, "Petitioner(s) have been in contract discussions with an outside provider (as stated on Petition page 132), Northwest

Evaluation Association (NWEA), and have made arrangements to use Measures of Academic Performance (MAP) summative semester benchmarks for PCA during its initial years of operation. Upon authorization, PCA will finalize this preliminary agreement with Raymond Mitchell, NWEA consultant, as a contract with NWEA for summative benchmarks and accompanying staff professional development for summative and formative assessment."

Outside providers are also referenced on Petition (appeal) pages 130 and 134 and in Question Responses #2 and #3 in Petitioners' letter submitted to SJUSD dated 9/22/14, copies of which were provided to SCOE on 12/17/14.

Detailing staff development activities in a calendar/timetable is not a required petition element, however, the Petitioners have attached their PCA Professional Development Plan for 2015-16 in Section 8.

"Also, due to the numerous expectations of teachers, there may not be sufficient time for them to accomplish all that is expected in the time allotted. For example, teachers are expected to plan weekly with their grade level team to map out curriculum, develop benchmark assessments for their content area(s), mentor students, participate in weekly Student Success Team meetings, develop community-based service learning projects, attend and participate in school community events, and learn about and participate in all of the above-mentioned professional development opportunities." This supposition is unsubstantiated and problematic in that it assumes low expectations for staff and, in turn, student outcomes. This statement is also incorrectly assumes various professional development activities outlined and discussed in the Charter Petition would be adopted in a short time frame. The Petitioners are following a specific staff development plan of activities, each year of operations. A copy of PCA's Professional Development Plan for 2015-16 is attached in Section 8.

"3. The petition includes annual goals and actions to achieve the eight state priorities; however, the eight priorities are not integrated throughout the petition."

"Since July 1, 2013, charter schools filing initial charter petitions must incorporate into the petition the required Local Control and Accountability Plan (LCAP) information regarding the eight state priorities. Specifically, charter petitions must include a description of the annual goals and actions in the eight state priority areas in Education Code section 52060 that apply to the grade levels served and the nature of the charter school's program. (Ed. Code, §§47605(b)(5)(A(ii).)"

"The petition includes a chart describing the eight priorities, which it labels achievement goals (pages 125-130). The chart contains the actions Petitioner will take to achieve the goals, the method of assessment, and the persons responsible. The actions described are appropriate to achieve each goal; however, as noted in section III.B below, the petition lacks specific measurable targets for each action. In addition, because most

actions are not incorporated throughout the petition narrative, the eight priorities are not an integral part of the petition."

Petitioners provided the table of Measureable Goals of the Educational Program listed below to SJUSD on 10/13/14, further clarifying achievement goals listed on Petition pages 125-130. These quantifiable specific goals and targets include the required eight state priority areas in Education Code Section 52060 that are referenced in Education Code §§47605(b)(5)(A(ii):

Measurable Goals of the Educational Program

are maintained in good repair (E.C. 17002 (d)) School Action	Method(s) Of Assessment	Person(s) Responsible
100% of staff to receive background and credential check prior to hiring and being given an assignment(s).	DOJ fingerprinting, CCTC check	Chief Executive Officer; Principal
100% of courses to be checked for standards- aligned materials.	Curriculum Mapping, Curriculum Calibration, Annual Instructional Inventory	Principal; Director of Fiscal Services
100% of students will have access to standards- aligned materials.	Curriculum Mapping, Curriculum Calibration, Annual Instructional Inventory	Principal; Director of Fiscal Services; Coordinator of Technology
100% of school facilities will undergo annual site and safety checks.	Site Facility Visit, Site Safety Check, School Safety Plan	Chief Executive Officer; Principal
100% of facilities' maintenance and repair records or logs will be reviewed annually for timeliness and completion of projects.	Maintenance Reports, Repair Records, and Project Logs; Applicable contracts, MOU's	Chief Executive Officer; Director of Fiscal Services; Coordinator of Technology
ACHIEVEMENT GOAL #2-IMPLEMENTATION OF COI The charter school will meet or exceed the same acc the implementation of Common Core State Standard academic content knowledge and English language	countability standards as distr is, including how EL students	ict schools regarding
School Action	Method(s) Of Assessment	Person(s) Responsible
100% of English and Mathematics courses to be	Curriculum Mapping	Principal;

100% of students will become proficient readers and writers of the English language.	SBAC English-Language Arts Test,	Principal; Site Testing
<ul> <li>70% or more of all students will demonstrate at least one year of growth on the SBAC English-Language Arts Test</li> <li>70% or more of all students will be proficient or advanced (or comparable designation) on the SBAC English-Language Arts Test</li> <li>70% or more of all students will be classified as proficient or advanced, using grade equivalence, on PCA's adopted standardized reading diagnostic test</li> <li>70% or more of all students will show growth on the PCA English benchmark examinations</li> <li>80% or more of all students will earn a passing grade of "C" or above in their Humanities-English course</li> <li>80% or more of all students will earn a</li> </ul>	CELDT, CAHSEE, PCA's Adopted Reading Diagnostic Test, English Benchmark Tests, PCA Summative Writing Performance Assessment, CalMAPP, Report Cards, Progress Reports	Coordinator; Chief Executive Officer; Coordinator of Technology;
rating of proficient or advanced on a PCA summative performance assessment in writing		
100% of students will become proficient in mathematical skills and content.  • 70% or more of all students will demonstrate at least one year of growth on the SBAC Mathematics Test	SBAC Mathematics Test, CAHSEE, Mathematics Benchmark Tests, CalMAPP,	Principal; Site Testing Coordinator; Chief Executive Officer;
<ul> <li>70% or more of all students will be proficient or advanced (or comparable designation) on the SBAC Mathematics Test</li> </ul>	Report Cards, Progress Reports	Coordinator of Technology
<ul> <li>70% or more of all students will show growth on the PCA mathematics benchmark examinations</li> <li>80% or more of all students will earn a passing grade of "C" or above in their mathematics course</li> </ul>		
100% of ELs, not re-designated, will be enrolled in daily ELD in addition to their ELA/Humanities course(s).	SIS EL Reports, EL Class Schedules	Principal
100% of teachers will be continually trained in ELD and SDAIE or sheltered instructional techniques and strategies.	Staff Development Agendas Staff Development Sign-In Sheets	Principal; Chief Executive Officer
100% of teachers will utilize sheltered instructional methodologies in the delivery of their academic course content.	Peer Lesson Demonstrations Focus Walk Protocols School Focus Walks	Principal; Chief Executive Officer
ACHIEVEMENT GOAL #3-PARENTAL INVOLVEMENT The charter school will meet or exceed the same acc involvement, including efforts to seek parent input fo will promote parent participation.	ountability standards as distric	t schools for parenta s, and how the school
School Action	Method(s) Of Assessment	Person(s) Responsible
100% of parents will be asked to participate in a minimum number of annual volunteer hours set by the PCA Board of Directors.	Monthly Accounting of Parent Point Hours	Principal; Parent Advisory Council Parents

<ul> <li>90% or more of parents and/or families will complete PCA's annual volunteer requests (established by the PCA Board of Directors)</li> </ul>		
100% of parents and families will be provided an opportunity to provide input and feedback regarding school program decisions.  * 70% or more of parents will complete the annual school community survey.  (Faculty, students, and parents will be survey participants.)	Parent Advisory Council Annual Parent/Family Survey ELAC Parent Nights, Meetings & Seminars Various School Committees (e.g. Safety, Fundraising, Parent Reporting)	Principal; Parent Advisory Council; Parents
100% of parents will have access to all school web information resources. (via home or school computers)	SIS Parent Portal School Website E-Newsletter	Principal; Parent Advisory Council; Coordinator of Technology
100% of parents or families will be actively engaged in goal setting and monitoring of student learning plans with their children.	Personal Learning Plans Advisory Goal Setting Meetings Portfolio Presentations Student Success Team Meetings (as needed)	Principal; Advisory Teachers; Parents; Students
95% of parents and families will attend at least two school functions and activities per year.	Attendance Rates: PCA Board Meetings, Parent Advisory Council Meetings, Parent Information Meetings & Seminars, Back to School Nights, Open House Nights, Fundraising Events, Extracurricular Events	Principal; Chief Accountability Officer; Parents

#### ACHIEVEMENT GOAL #4-STUDENT ACHIEVEMENT

The charter school will meet or exceed the same accountability standards as district schools for pupil achievement, as measured by all of the following, as applicable:

A. CA Measurement of Academic Progress and Performance on statewide assessment (as available)

- B. The Academic Performance Index (API) (as available)
- C. Percentage of pupils who are college and career ready
- D. Percentage of ELs who make progress toward English language proficiency as measured by the California English Language Development Test (CELDT) and/or English Language Proficiency Assessment for California (ELPAC)
- E. EL reclassification rate
- F. Percentage of pupils who have passed an AP exam with a score of 3 or higher
- G. Percentage of pupils who participate in and demonstrate college preparedness pursuant to the Early Assessment Program (E.C. 99300 et seq.) or any subsequent assessment of college preparedness

School Action	Method(s) Of Assessment	Person(s) Responsible
100% of pupil achievement will be assessed annually via state required assessments.	CAMAPP, SBAC, API (as available and applicable)	Principal; Site Testing Coordinator; Advisory Teachers
100% of pupil achievement in English/language arts will be assessed continually via reading diagnostic and internal assessments.	PCA adopted standardized reading diagnostic test; English benchmark exams; summative performance writing assessments	Principal; Site Testing Coordinator; Advisory Teachers
Reclassification rates of all EL's will be monitored annually:  * 80% of EL's (with fluency level of 5) will be reclassified each year	SIS EL Reports & Lists EL Profiles & Progress Reports; Annual Reclassification Reports	Principal; Coordinator of Technology

	95% of EL's will advance at least one fluency level each year		
annuall	EL's (not reclassified) will be assessed y via state required assessments for	CELDT, ELPAC (as available and applicable),	
	Learners	SBAC-ELA	
100% of science continu All stud concept	f pupil achievement in mathematics, and social studies will be assessed ally via internal assessments.  ents will become proficient in science its and scientific thinking.  70% or more of all 8th and 10th grade students will score proficient or advanced on the California Standards Test (CST) for science  70% or more of all students will show growth on the PCA science benchmark examinations  80% or more of all students will earn a passing grade of "C" or above in their science course  80% or more of all students will earn a rating of proficient or advanced on a portfolio submission related to science ents will become proficient in social practices and content.  70% or more of all students will show growth on the PCA social studies benchmark examinations  80% or more of all students will earn a passing grade of "C" or above in their Humanities-Social Science course  80% or more of all students will earn a rating of proficient or advanced on a	Math benchmark exams; science benchmark exams; humanities-social science benchmark exams; portfolio submissions; service learning projects	Principal; Site Testing Coordinator; Advisor Teachers
	portfolio submission related to social		
1000/	studies		
	PCA graduates will be college ready and	EAP Results; Internship	Principal;
	with necessary academic and	Results; AP Scores; Year-	Coordinator of
ocial/e	motional skills for the 21st century. 75% or more of all students will score proficient or advanced, demonstrating high levels of critical thinking in the planning and execution of year-end portfolio projects, as evaluated on teacher-created rubrics	End Portfolio Projects; Service Learning Projects; High School Completion Reports of UC A-G Requirements (Transcripts)	Technology; Advisory Teachers; Executive Assistant
*	75% or more of all students will reach goals set in Personal Learning Plans		
*	95% or more of all students will take and pass the California High School Exit Exam (CAHSEE) on the first attempt		
4	100% of all students will complete the UC A-G requirements		
	100% of all students will participate in service learning projects		
Monitor	ing of AP passage rates of all high school	AP Scores	Principal:
	s in AP courses.		Advisory Teachers
*	80% or more of all students enrolled in AP courses will pass an AP exam with a score of 3 or higher		

The charter school will meet or exceed the same accountability standards as district schools regarding pupil engagement, as measured by all of the following, as applicable:

- A. School attendance rates
- B. Chronic absenteeism rates
- C. Middle school dropout rates (E.C. 52052.1(a)(3))
- D. High school dropout rates
- E. High school graduation rates

School Action	Method(s) Of Assessment	Person(s) Responsible
School, class, and period attendance rates will be continuously monitored.  The average daily attendance rate will meet or exceed 96% each year  PCA will meet its annual enrollment goals	SIS Monthly Attendance Reporting, SIS P1, P2, EOY Attendance Reporting	Principal; Chief Executive Officer; Director of Fiscal Services; Executive Assistant
Student engagement in all classes will be at or above 95%.	Focus Walk Protocols, Classroom Focus Walks	Principal; Chief Executive Officer
Chronic absenteeism rates for all grades will be at or below 0.5% annually.	Personal Learning Plans, Goal Setting & Monitoring Meetings, Student Success Team Meetings, IEP Meetings	Principal; Advisory Teachers
100% of Middle grade students who withdraw from PCA will be monitored and tracked for successful transfer to other schools and/or programs.	Withdrawal Records, Cum Request Records & Files, SIS Enrollment Reports	Principal; Coordinator of Technology; Executive Assistant
100% of High school grade students who withdraw from PCA will be monitored and tracked for successful transfer to other schools and/or programs.	Withdrawal Records, Cum Request Records & Files, SIS Enrollment Reports	Principal; Coordinator of Technology; Executive Assistant
100% of High school grade students will be monitored for successful completion of graduation requirements.	CAHSEE, Report Cards, Progress Reports, SIS Transcript Reports, Personal Learning Plans, Parent/Student/Advisory Goal Monitoring Meetings	Principal; Advisory Teachers; Coordinator of Technology

#### ACHIEVEMENT GOAL #6-SCHOOL CLIMATE

The charter school will meet the same accountability standards as district schools school climate, as measured by all of the following, as applicable:

- A. Pupil suspension rates
- B. Pupil expulsion rates
- C. Other local measures, including surveys of pupils, parents, and teachers on the sense of safety and school connectedness

School Action	Method(s) Of Assessment	Person(s) Responsible
Pupil suspension rates will be at or below 4% annually. [2012/13 SJUSD rate is 8.3%; Sacramento County rate is 7.1%]	Annual SIS Suspension Summary Reports	Principal; Coordinator of Technology Chief Executive Officer
Pupil expulsion rates will be at or below 0.1% annually. [2012/13 SJUSD and Sacramento County rates are 0.1%]	Annual SIS Expulsion Summary Reports	Principal; Coordinator of Technology Chief Executive Officer

Uniform Complaints will be at or below 2% annually.	Annual UCP Summary Report	Chief Executive Officer
100% of parents, students, teachers, and families will have the opportunity to provide input and feedback on safety and connectedness at school.	Annual School Community Survey	Parent Advisory Council; Chief Executive Officer; Coordinator of Technology; Principal; Teachers; Students; Parents
100% of parents and families will have an opportunity to complete annual parent volunteer hour requirements (established by the PCA Board of Directors).	Annual Parent Point Volunteer Report Summary	Parent Advisory Council; Chief Executive Officer; Coordinator of Technology; Principal; Parents

#### ACHIEVEMENT GOAL #7-COURSE ACCESS

The charter school will meet the same standards district schools are held to regarding the extent to which pupils have access to, and are enrolled in, a broad course of study, including programs and services developed and provided to unduplicated students (classified as EL, FRPM-eligible, or foster youth; E.C. 42238.02) and students with exceptional needs.

"Broad course of study" includes the following, as applicable:

<u>Grades 1-6:</u> English, mathematics, social sciences, science, visual and performing arts, health, physical education, and other as prescribed by the governing board. (E.C. 51210)

Grades 7-12: English, social sciences, foreign language(s), physical education, science, mathematics,

visual and performing arts, applied arts, and career technical education. (E.C. 51220 (a)-(i))

School Action	Method(s) Of Assessment	Person(s) Responsible
100% of 6 <sup>th</sup> grade middle school students will be enrolled in a broad course of study as defined in E.C. 51210.	6th Grade Student Schedules; 6th Grade SIS Schedule Reports; 6th Grade Personal Learning Plans; 6th Grade Transcripts	Principal; Advisory Teacher; Coordinator of Technology
100% of 7-12th grade middle and high school students will be enrolled in a broad course of study as defined in E.C. 51220 (a)-(i).	7th-12th Grade Student Schedules; 7-12th Grade SIS Schedule Reports; 7- 12th Grade Personal Learning Plans; 7-12th Grade Transcripts	Principal; Advisory Teacher; Coordinator of Technology

#### ACHIEVEMENT GOAL #8-STUDENT PERFORMANCE

All students will demonstrate appropriate developmental or age/grade level mastery of State and National standards (see <a href="http://www.cde.ca.gov/be/st/ss/">http://www.cde.ca.gov/be/st/ss/</a> and <a href="http://www.cde.ca.gov/be/st/ss/">www.corestandards.org</a>) and aligned with the state's priorities detailed in California Education Code Section 51220 (grades 7-8). Individual performance goals will be established for each student at the beginning of each year based on his/her baseline benchmark assessments, past academic performance, special needs/IEP, and other available data as measured by all of the following, as applicable:

- A. Internal Assessments
- B. Growth

C. Social Responsibility

School Action	Method(s) Of Assessment	Person(s) Responsible
100% of students will develop personal performance goals collaboratively with their parents and advisory teacher, at the commencement of the school year.	Baseline benchmark assessments; past academic performance; personal needs (IEP, as applicable); internal assessments	Advisory Teachers; Students; Parents
100% of students will review/revisit their personal performance goals throughout the school year	Benchmark assessments; personal needs; internal	Advisory Teachers; Students;

with parents and their advisory teacher and make adjustments, as necessary.	assessments; grade reports; progress reports; attendance reports	Parents
100% of students will develop and complete a year-end portfolio project that demonstrates performance growth and responsibility.	Personal Learning Plan; Digital Portfolio	Advisory Teachers; Students
100% of students will participate in a service learning project to fulfill high school graduation requirements.	Personal Learning Plan; Service Learning Project; Digital Portfolio	Advisory Teachers; Students

## "4. <u>The petition does not present a sound educational program for students requiring special education services."</u>

"A charter petition is an unsound educational program if it would not likely be of benefit to the pupils who attend. (5 Cal. Code Regs., § 11967.5.1(b)(2).) The petition does not demonstrate that it would adequately serve the educational needs of students requiring special education services."

This statement is inaccurate and does not reflect the required change in authorizer from District to County. The PCA Charter Petition was vetted by special education and legal experts and was found to provide all required program descriptions and elements for special education as outlined on Petition pages 104-121 and in Education Code 47605 et seq. Petitioners also provided additional responses regarding the Charter's program to serve students with special needs in its letters to SJUSD dated 9/22/14, 9/25/14, and 9/24/14. Copies of these letters containing elaboration of these program responses were included in the appeal documents presented to SCOE on 12/17/14.

Due to change of authorizer on appeal from District to County, Petitioners have attached further documentation of their special education services plan in Section 6 which provides detailed descriptions of the full array and continuum of special education programs and services PCA will provide as well a full description of the processes and procedures PCA will follow in identifying and serving students with disabilities as required by the Individuals with Disabilities Education Improvement Act of 2004 (IDEA), Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, and any other civil rights enforced by the US Department of Education Office of Civil Rights (OCR).

"Petitioner intends to operate as its own Local Educational Agency (LEA) for special education purposes under the auspices of the El Dorado or Sonoma SELPA. As an LEA, Petitioner must demonstrate that it can meet the needs of all eligible students as required by state and federal special education laws. This means that Petitioner must have its own special education systems in place, as would be required of a school district. The petition does not demonstrate that Petitioner can fulfill its responsibilities for administering the continuum of special education services required by law.

This statement is incorrect. The Charter Petition and budgets describe and indicate that PCA will be its own LEA and be a member of a Charter SELPA. Furthermore, the petition outlined how PCA would manage and provide special education services in a FAPE and 'least restrictive environment' through a special education credentialed resource teacher. The Petition and budget(s) also

described how PCA students would be identified and served in full compliance with all applicable state and federal laws pertaining to special education. Petitioners also provided additional supporting information to SJUSD dated 9/22/14, 9/25/14, and 9/24/14 which further described pre-identification and student study team processes, as well as repeatedly explained that PCA would be a "school of the district" for purposes of providing special education services. Copies of these letters containing elaboration of these program responses were included in the appeal documents presented to SCOE on 12/17/14.

Due to change of authorizer on appeal from District to County, Petitioners have attached copies of their special education services plan and English learner instructional master plan in Sections 6 and 7.

"The petition contains no description of charter staff's experience, background, or knowledge of special education laws and requirements, nor does it demonstrate an understanding of a LEA's responsibilities for fully serving students with special needs."

This statement is inaccurate. Petitioners included biographies of PCA Board and Development Team Members, discussing the various staff experience, background and knowledge of special education on Petition pages 9, 12, 14, 16, 20, and 21. Additional staff and development team experiences were provided to SCOE in appeal documents submitted on 12/17/14. Additional descriptions were provided in Petitioners' Responses to SJUSD Review Team & Governance Board Written Findings on pages 2 and 8.

"The petition includes references to Child Find, Referral, Assessment, and the IEP process. It also states that students will be fully integrated. However, full integration may not be appropriate for all students at all times. The petition does not describe how students with special needs will access the core curriculum. There are no references to the full continuum of program options, such as Resource Specialist, Designated Instructional Services, Special Day Class, Non-public school, etc., nor how transportation would be provided to access special education services." In a memorandum dated December 8, 2009 on the subject "Special Education Local Plan Area and Charter Schools Pilot Project Report", William J. Ellerbee, Jr., Deputy Superintendent Special Services and Support Branch for the California Department of Education, issued information and guidance on charter school participation in SELPAs and the provision of special education services. The CDE memorandum contains the following information which is pertinent to this question and directly refutes the information provided by SCOE staff: "As a condition of charter approval, a charter petition must describe how special education services will be provided to eligible students with disabilities. There are two options for charter schools. The first option is a charter school electing to remain a school of the authorizing LEA for special education purposes. The authorizing LEA is required to treat each charter school under its authority in the same manner as it regards all of its other schools." "...a charter school that elects to be an LEA for the purposes of special education shares in the

governance of the SELPA and assumes responsibility for implementing SELPA's local plan. A charter school LEA is fiscally responsible for all costs associated with providing FAPE to its eligible students with disabilities, including any excess costs that exceed special education funding. In this arrangement, the charter school LEA can now directly affect costs through the method and delivery of special education services to its students." As confirmed in this letter from the CDE, the charter petition is only required to describe whether the charter school will be a school of the district or its own LEA for purposes of special education. Once the school is approved and accepted into a SELPA then the charter would work with the SELPA to implement the SELPA's local plan and arrange for services.

Petitioners also provided additional responses regarding the Charter's program to serve students with special needs in its letters to SJUSD dated 9/22/14, 9/25/14, and 9/24/14. Copies of these letters containing elaboration of these program responses were included in appeal documents presented to SCOE on 12/17/14. Although Petitioners provided adequate descriptions as described by CDE, Petitioners have attached additional support documentation through their special education services plan in Sections 6.

"As detailed in the financial section above, while the petition describes the basic special education dollars it expects to receive, it significantly underestimates its financial responsibilities for providing special education services. The petition does not specifically address the special education funding allocation process. There is no mention of how high cost students will be served, and no dollars are appropriated for assessment purposes, i.e., psychologist."

As mentioned previously in responses to the financial analysis, this assumption is flawed as it is not feasibly prudent and Petitioners have demonstrated in all budgets submitted, that they have extremely high cash reserves to adequately cover costs for high cost special education students, should the need arise. Petitioners understand the financial obligations of operating as their own Local Education Agency (LEA) for special education services, which involves providing 100% of services for its students with special needs. In addition to demonstrating that Petitioners will have more than ample cash reserves to cover high cost students, PCA has proactively developed a collaborative partnership with other charter schools in the vicinity of PCA's target area. PCA is currently working with the nearby ASPIRE-Alexander Twilight charter school to develop shared special education services, equipment, and materials, thereby significantly reducing costs associated with providing services such as low incidence cases, testing, etc. PCA is also working to promote this network of collaborative services with other charter and private schools in Arden Arcade such as Carden School of Sacramento, Town and Country Lutheran School and the California Montessori Project. See attached Special Education Plan in Section 5.

"In summary, Petitioner has no plan for the adequate administration or financing of the full continuum of special education services required by law. Therefore, the petition

does not demonstrate that it would adequately serve the needs of students requiring special education services."

This summary is inaccurate for reasons outlined in the responses above. Petitioners have adequate cash reserves to meet financial obligations for high cost special education services and Petitioners will seek to share special education services and equipment with other charter and private schools, significantly decreasing costs for special education services. PCA Charter Petition was vetted by special education and legal experts and was found to provide all required program descriptions and elements for special education as outlined on Petition pages 104-121 and in Education Code 47605 et seq. Petitioners also provided additional responses regarding the Charter's program to serve students with special needs in its letters to SJUSD dated 9/22/14, 9/25/14, and 9/24/14. Copies of these letters containing elaboration of these program responses were included in appeal documents presented to SCOE on 12/17/14.

Due to change of authorizer on appeal from District to County, Petitioners have attached copies of their special education services plan and English learner instructional master plan in Sections 6 and 7.

"5. The petition does not adequately describe how English learners will be served as required by law."

"Overall, the petition does not provide sufficient detail to determine that the program for English learners (ELs) is reasonably sound and meets the requirements of federal and state laws as they pertain to providing equal educational opportunities for ELs. As described below, the petition does not adequately serve ELs as legally required in the areas of Program of Instruction, Teacher Qualification, and Reclassification." This statement is not aligned with charter school law and education code and demonstrates an unclear understanding of English Learner Master Plan components. The PCA Petition does explain EL program instruction, including sheltered instruction and English language development. The petition provides appropriate teacher qualifications that fully comply with CCTC regulations for authorization to teach ELs and reclassification is described as required by EL Regulations. Thus the petition meets all regulations of California Education Code 47605 (b)(A)(i) and (ii) for charter petition requirements and includes all state and federal program assurances and legal descriptions for serving English learners on pages 107-110. Petitioners also included PCA's EL Instructional Master Plan in Section 7.

"Initial Identification of ELs"

"Page 109 of the petition outlines the process for the initial identification of ELs, including the use of the Home Language Survey and conducting the initial English language assessment with the California English Language Development Test (CELDT). The petition meets the initial assessment timeline of testing the students within 30 days of enrollment."

#### "Program of Instruction"

"Federal law requires that in addition to core curriculum, ELs in public schools must receive a program of instruction in English language development (ELD) in order to develop proficiency in English as rapidly and effectively as possible. Although general information about the instructional program is included within the petition, it lacks some key details and a clear articulation of the organizational design of the ELs instructional program that would help demonstrate that students at each English language proficiency level will be provided access to the core curriculum and ELD. Consequently, the petition does not demonstrate that it complies with the instructional program requirements for ELs"

As mentioned previously, this statement indicates an unclear understanding of required petition elements for ELs versus elements outlined in an English Learner Master Plan. The PCA Petition meets all regulations of California Education Code 47605 (b)(A)(i) and (ii) for charter petition requirements and includes all state and federal program assurances and legal descriptions for serving English learners on pages 107-110, including all charter petition requirements for EL program of instruction. Petitioners also included PCA's EL Instructional Master Plan in Section 7.

"Several sections of the petition provide general information regarding how Petitioner plans to provide an instructional program for ELs. Page 126 assures that "All ELs, not re-designated, will be enrolled in daily ELD in addition to their ELA/Humanities course(s)" and ELD is listed on the "Curriculum Resources by Subject and Grade" table (page 100). A paragraph entitled "English Language Development" on page 97 includes information about ELD materials (EDGE, Language!, and supplemental materials), Specially Designed Academic instruction in English (SDAIE), and the use of English as a Second Language (ESL) strategies. However, the petition lacks the clarifying details that would explain how the proposed services for ELs would be implemented."

This statement also indicates an unclear understanding of required petition elements for ELs versus elements outlined in an English Learner Master Plan. Specific clarifying details for how services for ELs shall be delivered and implemented are elements included in an EL Master Plan. The PCA Petition meets all regulations of California Education Code 47605 (b)(A)(i) and (ii) for charter petition requirements and includes all state and federal program assurances and legal descriptions for serving English learners on pages 107-110. Petitioners also included PCA's EL Instructional Master Plan in Section 7.

"The petition omits key information about ELD that would demonstrate how a comprehensive program will be provided for each English learner. Page 110 states that "Newcomers will receive English as a Second Language (ESL) instruction and Teaching English to Speakers of Other Languages (TESOL) strategies will be used to build language proficiency. ESL and TESOL will be provided alongside and in conjunction with English Language Arts." The petition lacks a description for the instructional

program that will be provided to ELs that are not identified as "newcomers." Additionally, ELD is not included in the list of PCA Course requirements (page 85), the sequence of courses (page 86), the sample middle school weekly schedule (page 89) or high school weekly schedule (page 91), or within the Curriculum Design (page 95). Additionally, the 2012 California ELD Standards are absent from the curriculum standards matrix (page 96). Without the information noted above, it is not possible to determine that Petitioner intends to ensure that all ELs will receive designated ELD instruction within their educational program."

This statement indicates a lack of understanding of required petition elements for ELs. Specific details regarding English Language Development (ELD) is provided in EL Master Plans. The PCA Petition meets all regulations of California Education Code 47605 (b)(A)(i) and (ii) for charter petition requirements and includes all state and federal program assurances and legal descriptions for serving English learners on pages 107-110, including all charter petition requirements for program of instruction in ELD. Petitioners also included PCA's EL Instructional Master Plan in Section 7. Additionally, ELD is inaccurately referred to a "course." ELD is provided in addition to an EL's language arts instruction and can be delivered in a variety of flexible ability groupings involving push-in and pull-out scenarios, not necessarily as a course. Therefore, ELD should not necessarily and/or accurately be listed on a sample weekly schedule, etc.

#### "Teacher Qualifications"

"In California, teachers assigned to provide instruction to ELs must be appropriately certified. On page 110, the petition assures that "all teachers at PCA will possess certification to teach English learners in California." However, this assurance conflicts with a statement in another section of the petition. The Teacher Qualifications list notes that teachers may be "CLAD Certified or working toward certification" (page 157). The assignment of teachers without the appropriate certification to provide instruction to ELs violates the requirement."

This statement is inaccurate as it conflicts with current California Commission on Teacher Credentialing's (CCTC) approved list of teacher authorizations to serve ELs. The following is the current listing from CCTC (1/15):

CCTC Credentials, Certificates, Permits, and Supplementary Authorizations Issued by the Commission that Authorize Instruction to English Learners

- -Multiple or Single Subject Teaching Credential with English Learner Authorization or CLAD Emphasis
- -Multiple or Single Subject Teaching Credential with a Bilingual authorization or BCLAD Emphasis
- -Education Specialist Instruction Credential with English Learner Authorization
- -Bilingual Crosscultural Specialist Credential
- -CLAD Certificate
- -Bilingual Authorization
- -Language Development Specialist (LDS) Certificate
- -BCLAD Certificate
- -Bilingual Certificate of Competence (BCC)
- -General Teaching Credential
- -Supplementary Authorization in English as a Second Language (ESL) or Introductory ESL

- -University Intern Credential with English Learner Authorization or CLAD Emphasis
- -University Intern Credential with a Bilingual Authorization or BCLAD Emphasis
- -District Intern Credential with English Learner Authorization
- -District Intern Credential with a Bilingual Authorization or BCLAD Emphasis
- -Clear Designated Subjects Career Technical Education Credential
- -Emergency CLAD Permit
- -Emergency BL Permit
- -Provisional Internship Permit/Short Term Staff Permit with English Learner Authorization
- -Provisional Internship Permit/Short-Term Staff Permit with Bilingual Authorization
- -Certificate of Completion of Staff Development
- -Certificate of Completion of Staff Development (SB 1969)

1/15

As noted from the underlined CCTC credential types in the list above, there are instances in which the CCTC allows teachers 'working toward certification' to instruct English learners.

"Based on the conflicting information within the petition, it is not possible to verify that the petition complies with the certification requirements for teachers. This requirement is significant given that Petitioner estimates 10% of students in the district are designated as ELs, and that Petitioner "intends to include families from the same range of socio-economic, racial, linguistic, and cultural backgrounds as the areas served by SJUSD" (page 50)."

This assumption is flawed as noted in the CCTC credential types listed previously. As explained in the previous response, there are instances in which the CCTC allows teachers 'working toward certification' to instruct English learners. The Petitioners intend to provide high quality instruction to every student demographic and family described on petition page 50 and work toward eliminating the achievement gaps in the Arden Arcade.

#### "Reclassification"

"Page 109 assures that "PCA will monitor and adjust the (redesignation) processes...as dictated by the State Board of Education, in order to stay in full compliance with all state and federal rules and regulations." The petition lists the general guidelines that will be used to reclassify ELs to fluent-English proficient status. (Ed. Code, § 313.) There are no criteria for evaluating the English language performance on CELDT or an explanation of the objective measure that will be used to measure basic skills, including an acceptable cut-point for performance. Additionally, the petition does not address how ELs who become fluent-English proficient will be monitored for at least two years after their reclassification. Although the petition assures that the proper procedures will be followed, it is not possible to determine whether or not the appropriate criteria are being applied to determine whether a student is eligible for reclassification. (20 U.S.C. § 6841; Cal. Code Regs., tit. 5, § 11304; Ed. Code, § 313(d).)" This statement also indicates lack of understanding of required petition elements for ELs versus reclassification outlined in an EL Master Plan. PCA's Petition provides the necessary elements required of California Education Code 47605 (b)(A)(i) and (ii) for charter petitions to describe reclassification procedures and includes all state and federal program assurances and legal descriptions for serving English learners on pages 107-110. Petitioners also included PCA's EL Instructional Master Plan in Section 7, which provide the standardized objective measures to be used in the reclassification process, as well as cut-points for

## performance. The plan also fully outlines EL monitoring procedures in full compliance with EL regulations.

"Assessment and Parent Communication"

"The petition adequately addresses assessment of ELs and appropriate communications with parents of ELs."

#### "6. Summary of Educational Program"

"The petition does not demonstrate that it would adequately serve students requiring special education services and ELs. While the petition describes research-based instructional programs for general education students, given the broad scope of intended educational practices and the lack of a detailed plan or timeline to accomplish the numerous expectations, it is unlikely Petitioner can successfully implement all of its intended practices. As noted below, the lack of adequate measurable pupil outcomes will prevent a full assessment of whether Petitioner's educational objectives are successfully met."

This assumption demonstrates an unclear understanding of charter program elements for ELs as required by charter law. The petition contains all required elements for the educational program as stipulated in Charter Law of California Education Code 47605 (b)(5)(A)(i) and (ii).

This statement assumes incorrectly, that Petitioners lack a detailed plan of implementation. A copy of the PCA Staff Development Plan and EL Master Plan are included in Sections 7 and 8. PCA also formulated specific measurable pupil outcomes in its petition on pages 125-130 and included additional measurable pupil goals on pages 19-25 herein. These quantifiable goals provide specific outcomes for ELs.

## "Based on the above discussion, the petition does not contain a reasonably comprehensive description of the educational program."

This conclusion indicates a lack of understanding of the petition, appendices and associated documentation regarding the PCA educational as described in Petitioners' responses above.

#### "B. Element B - Measurable Pupil Outcomes"

"The regulations require that Petitioner specify "measurable pupil outcomes," specifically, skills, knowledge, and attitudes that reflect the school's educational objectives that can be assessed by objective means that are frequent and sufficiently detailed to determine whether students are making satisfactory progress. (5 Cal. Code Regs., § 11967.5.1(f)(2).) In addition, the pupil outcomes must align with the state priorities, as described in Education Code section 52060(d), that apply for the grade levels served or the nature of the program operated by the charter school. (Ed. Code, § 47605(b)(5)(B).)

"Although the petition addresses the eight state priorities, Figure 26 on pages 125-130 does not include specific measurable goals or targets for each specified action or metric. General references to "the charter school will meet or exceed the same accountability standards as district schools" are insufficient for determining Petitioner's goals, holding Petitioner accountable for meeting those goals, and determining whether students are making satisfactory progress."

SCOE staff is recommending denial, in part, because they claim the measurable student outcomes are not detailed enough to hold the charter school accountable, if approved. The petition includes student outcomes and educational goals aligned with the 8 state priorities. Upon approval, the charter school will develop an annual Local Control Accountability Plan (LCAP) that will include feedback and information from school community stakeholders and will provide more detailed and targeted measurable outcomes aligned with the 8 state priorities and with the petition. The LCAP is the detailed plan that is associated with the items contained in Element B of the petition. These schoolwide measureable outcomes contained in the LCAP are also required to be updated annually. As such, the LCAP is not part of the petition but is the more appropriate avenue for determining and tracking the success of the charter in meeting it's agreed upon measurable outcomes. Since the schoolwide measureable outcomes within the LCAP will change annually based on the needs and performance of students attending the school, SCOE should not attempt to impose an overly descriptive level of detail. The petition submitted contains a comprehensive description of measureable outcomes as required under EC 47605. Petitioners provided the table of Measureable Goals of the Educational Program to SJUSD on 10/13/14, further clarifying achievement goals listed on Petition pages 125-130. These quantifiable goals and targets include the required 8 state priority areas in Education Code Section 52060 that are referenced in Education Code §§47605(b)(5)(A(ii). This table is included herein on pages 19-25.

"Typically, petitions include quantifiable measurable outcomes with specific annual targets such as "at least 85% of families will participate in school sponsored events and activities," or "100% of 6th grade student will complete the service learning requirement," or "75% of students will meet their reading goals as outlined in their individual learning plans and as measured by the benchmark assessments." Because the petition lacks specific goals and targets for the measurable outcomes outlined in Figure 26, it is very difficult to understand the expectations for students and hold Petitioner accountable for ensuring its goals are met."

Petitioners provided the table of Measureable Goals of the Educational Program to SJUSD on 10/13/14, further clarifying achievement goals listed on Petition pages 125-130. These quantifiable goals and targets include the required eight state priority areas in Education Code Section 52060 that are referenced in Education Code §§47605(b)(5)(A(ii). This table is included herein on pages 19-25.

"A number of the core tenets described in Petitioner's vision, academic focus, and plan section are not present in Figure 26 or elsewhere in this section. In particular, given the Science, Technology, Engineering, Art, and Mathematics (STEAM) focus of the charter, the petition should identify additional measurable outcomes in the areas of technology and art, yet none are mentioned. Measures of other core tenets of Petitioner's educational program such as civic literacy, environmental literacy, and the personal and career skills outlined in the P21 framework are also missing."

This statement is not accurate as it does not reflect the integrated nature of STEAM teaching and learning nor does it consider the digital portfolio, science, math, and overall technology goals listed in Figure 26. Also see pages 19-25, herein, for further quantifiable goals associated with the STEAM program.

"On page 124, the petition describes the intent to disaggregate data for each measurable outcome included in Figure 25, but then cites an outdated definition for numerically significant pupil subgroups. This definition was amended in 2013 by the Local Control Funding Formula legislation. Currently, any student group with 30 or more pupils must be reported for all measurable goals for LCAP, and other state and federal required reporting. (Ed. Code, § 52052(a)(3(A).) The petition should be updated to reflect California's current definition of a numerically significant student group."

Petitioners shall update pages 124-125 of the petition with the new numerically significant student group definition.

"In summary, the petition describes actions aligned to each of the eight required priorities and their proposed methods of assessment, but does not set specific quantifiable goals for the various actions. The lack of information about quantifiable goals and annual targets for student achievement makes it difficult to understand Petitioner's expectations for students and to determine if the school and students are making satisfactory progress."

Petitioners provided the table of Measureable Goals of the Educational Program to SJUSD on 10/13/14, further clarifying achievement goals listed on Petition pages 125-130. These quantifiable goals and targets are included herein on pages 19-25.

"Based on the above, the petition does not contain a reasonably comprehensive description of the measurable pupil outcomes identified for use by the school."

#### "C. Element C - Method of Measuring Pupil Progress"

"The petition must specify the methods by which pupil progress in meeting the specific pupil outcomes will be measured. To the extent practicable, the method for measuring pupil outcomes for the state priorities shall be consistent with the way information is reported on the school accountability report card. (Ed. Code, § 47605(b)(5)(C).)"

"The school must utilize a variety of assessment tools that are appropriate to the skills, knowledge, or attitudes being assessed, including at a minimum, tools that employ objective means of assessment. This must also include the annual assessment results from any state mandated testing program; a plan for collecting, analyzing, and reporting

data on student achievement to school staff, parents, and others; and a plan for utilizing the data for continuous monitoring and program improvement."

"The petition describes multiple methods to assess pupil outcomes. Because the connection between the various assessment tools and the outcomes or action steps identified in the previous section is poor, it is difficult to ascertain which tools will be used to evaluate performance and progress for which action steps/outcomes. Again, with a focus on STEAM, assessment tools to measure art, technology skills, and science in grades other than eight and ten should be included in Figure 26 (page 135); however, Petitioner does not indicate how it will measure those student skills."

"The petition includes a lengthy description about how the Cycle of Inquiry will be used to evaluate and analyze student data in a variety of settings and with a variety of stakeholders, but it is not clear how the research-based practices outlined in the Cycle of Inquiry and the various other frameworks on which Petitioner's educational program are based will be integrated into the school program."

"The methods of assessment plan includes a description of multiple measures that Petitioner will use to evaluate student performance and progress and communicate with parents, its authorizing agency, and other stakeholders. More attention should be paid to operationalizing the cited research-based practices (i.e., P21 framework, Cycle of Inquiry, etc.) into programs, practices, processes, and policies at the school site."

"While this section could be improved as noted above, the petition does contain a reasonably comprehensive description of the methods by which pupil progress in meeting the identified pupil outcomes is to be measured."

Petitioners provided the table of Measureable Goals of the Educational Program to SJUSD on 10/13/14, further clarifying achievement goals listed on Petition pages 125-130. These specific quantifiable goals and targets are included herein on pages 19-25 and are tied to the multiple measures referred to these SCOE statements and throughout Element C of the Petition.

#### "D. Element D - Governance Structure of the School"

"The petition describes the membership and duties of the board of directors and states that the school will encourage the participation of parents, faculty, staff, and students. It includes bylaws, articles of incorporation, and a conflict of interest code consistent with the Political Reform Act. It specifies that the board will comply with the Ralph M. Brown Act."

"The petition (pages 146-147) states that "parents will be obligated to contribute a minimum number of volunteer hours per family, per academic year to the Charter School," and that "no child will be excluded from the Charter School or school activities due to the failure of his/her parent or legal guardian to fulfill the minimum parent participation hours." While public schools, including charters, can request a certain number of parent volunteer hours and identify the benefits to the school, they cannot

require or obligate parents to volunteer. (Ed. Code, §49011; See also CDE Fiscal Management Advisory 15-01 (January 21, 2015).) Therefore, the parent volunteer "obligation" requires correction.

Petitioners will change the word "obligated" to "asked".

"With the above correction, the petition contains a reasonably comprehensive description of the governance structure of the school."

#### "E. Element E - Staff Qualifications"

"The petition identifies the general qualifications of various categories of employees the school anticipates and includes job descriptions and responsibilities for key positions. The petition should clarify that teachers must hold a Commission on Teacher Credentialing certificate, permit, or other document equivalent to that which a teacher in other public schools would be required to hold to serve English learners (ELs) (i.e., an English Language Authorization). The teacher job description states that teachers will be "CLAD Certified or working toward certification;" however, teachers without the appropriate certification may not provide instruction to ELs. In addition to not requiring an authorization to serve ELs, the job description refers to only one of several authorizations available to serve ELs."

Petitioners shall change the wording to clearly note instructors must have the appropriate certification, as outlined on page 26 herein. Petitioners will also include these statements on all teacher job descriptions.

"Subject to the above correction, the petition contains a reasonably comprehensive description of the qualifications to be met by staff."

#### "F. Element F - Health and Safety Procedures"

"Petitioner will require that employees undergo a criminal background check as required by Education Code section 44237. However, the statement that volunteers having direct contact with students would not need to be fingerprinted if they are working under supervision of a credentialed employee requires correction, as it conflicts with Education Code requirements."

Petitioners shall change the verbiage to state all volunteers shall be fingerprinted.

"Tuberculosis screening is required for staff prior to working with students as required by Education Code section 49406. Students and staff must provide immunization records as is required of all public schools. Students will be screened for vision, hearing, scoliosis, and oral health."

"Petitioner affirms that it will comply with facility safety requirements and will prepare a plan for disasters and emergencies."

"Subject to the above correction, the petition contains a reasonably comprehensive description of the health and safety procedures."

#### "G. Element G - Achievement of Racial and Ethnic Balance"

"Recognizing the limitations on admissions to charter schools imposed by Education Code section 47605(d), the means by which the school will achieve a racial and ethnic balance among its students that is reflective of the general populations residing within the territorial jurisdiction of the school district to which the charter petition is submitted is presumed met, absent specific information to the contrary. (5 Cal. Code Regs., § 11967.5.1(f)(7).)"

"Beginning on page 164, the petition verifies the commitment to recruit and create a school community that reflects the diversity of the school district. The petition describes proposed outreach, including outreach materials in other languages, community outreach, etc."

"The petition contains a reasonably comprehensive description of the means by which the school will achieve a racial and ethnic balance among its pupils that is reflective of the general population residing within the territorial jurisdiction of the school district."

#### "H. Element H - Admission Requirements"

"The admission procedures allow for enrollment of all students who wish to attend, and if applicants exceed capacity, then for admission based on a public random drawing. The petition describes the procedures for the public random drawing; exempts existing students from the lottery; and describes preferences for siblings, children of the school's employees, Board members, founding members (not to exceed 10% of the student population), and pupils who reside within the school district. These admission preferences are permitted by law."

# "The petition contains a reasonably comprehensive description of its admission requirements."

#### "I. Element I - Independent Financial Audits"

"The petition describes an annual independent audit process that is in accordance with state law and that will involve the Board of Directors and the charter authorizer."

# "The petition contains a reasonably comprehensive description of the annual independent financial audit."

#### "J. Element J - Suspension or Expulsion of Students"

"The petition includes a detailed description of the suspension and expulsion process, including a list of offenses for which a student may be disciplined, notice to students and parents, due process protections, and provisions for students with special needs."

"The petition contains a reasonably comprehensive description of the procedures by which pupils can be suspended or expelled."

"K. Element K - STRS/PERS Systems"

"The petition states certificated teachers and administrators shall participate in the State Teachers' Retirement System (STRS). The petition states non-certificated full-time and part-time employees will contribute to Social Security."

"The petition contains a reasonably comprehensive description of the manner by which staff members of the charter school will be covered by the STRS, PERS, or Social Security system."

"L. Element L - Student Attendance Alternatives"

"The petition appropriately states that no student is required to attend, students who choose not to attend may attend other public schools in the district, and that all parents and students will be informed that students have no right to admission in a particular school of a local education agency as a consequence of enrollment in the charter school."

"The petition contains a reasonably comprehensive description of the public school attendance alternatives."

"M. Element M - Rights of Employees"

The petition contains a reasonably comprehensive description of the rights of employees upon leaving employment of the district and any rights of return.

"N. Element N - Dispute Resolution"

"The petition contains a reasonably comprehensive description of a dispute resolution process."

"O. Element O - Exclusive Public School Employer"

"Petitioner notes that it is the exclusive public school employer for the purposes of the Educational Employment Relations Act (EERA) and will comply with all provisions of the EERA."

"The petition includes the required declaration; and therefore, contains a reasonably comprehensive description of this element."

"P. Element P - Closure Procedures"

"The closure procedures described on pages 195-197 includes appropriate notice, a final independent audit to determine assets and liabilities, and plans for disposing of any net assets (as described in the bylaws) and for the maintenance and transfer of pupil records."

"The petition contains a reasonably comprehensive description of the necessary closure procedures."

#### CONCLUSION

Based on the SCOE staff analyses and legal review, it is recommended that the Paramount Collegiate Academy charter petition appeal be denied on the grounds that:

- 1. The petition lacks a sound financial and operational plan;
  Petitioners have detailed herein numerous inaccurate findings related to the
  Charters' financial and operational plans, demonstrating SCOE staff's unclear
  understanding of charter funding and charter commercial facility leasing projects.
- 2. The petition does not present a sound educational program for students requiring special education services and English learners;
- Petitioners included all legal requirements necessary under California Education Code 47605 (b) (5) (A) (i) and (ii) for charter petitioners. Petitioners also included additional supporting evidence in its special education and English learner master plans due to authorizer changes on appeal from District to County.
- 3. The petition does not contain reasonably comprehensive descriptions of certain elements required by Education Code section 47605(b)(5), specifically, the educational program and measurable pupil outcomes; and
- Petitioners included all required elements required under Education Code Section 47605 (b)(5) and also included additional quantifiable and measurable pupil outcomes submitted to SJUSD on 10/13/14. Although not a requirement of charter petition elements per Education Code 47605 et seq, Petitioners have demonstrated they have a well-developed professional development plan that supports the implementation of the petition's educational program.
- 4. Petitioner is demonstrably unlikely to successfully implement the program set forth in the petition.

Petitioners are very likely to successfully implement the program set forth in the petition as they have demonstrated they possess the <u>capacity to implement the petition's program</u>. Petitioners have exhibited capacity through the following:

- A. Highly skilled and dedicated Board of Directors and Development Team who possess the myriad of skills and abilities necessary to manage and sustain a high quality charter school
- B. Large and ever-growing Arden Arcade parent and community involvement and support for the program as evidenced by 244 parent petition signatures, 25 letters of support, and high parent, team, and community attendance at District Hearings (75-100 attendees and speakers)

- C. Network of Professional Partnerships to assist in program transition and implementation such as:

  Northwest Evaluation Association, California Charter Schools
  Association, Charter School Management Corporation, Newmark,
  Cornish, & Carey, Carmichael Chamber of Commerce, Love & Logic,
  Inc.
- D. PCA passed highly stringent California Department of Education Peer Review for \$575,000 Federal Public Charter School Grant Funding

## PARAMOUNT COLLEGIATE ACADEMY

# Petitioners' Response to County Staff Findings

Section 2

	PARAMOUNT COLLEGIATE ACADEMY Multiyear Projections-February 9, 2015 COUNTY Author		PROPOSED BUD	GET SCENARIO A	A-RENTAL FACILI	TY
Object Code	munifold i rejections, conduct of 2010 and an incident	NOTES	START-UP	2015-2016 Year 1 <u>Total</u>	2016-20 (T) Year 20 Total (C)	2017-2018 Year 3 Total
	REVENUES		1		ento	
	LCFF State Revenues				Op.	
8015	Local Control Funding			1,481,922	2,091874	2,732,03
8096	Transfer to Charter Schools In Lieu of Property Tax	\$810/ADA			<u> </u>	
8100	Federal Revenue				.₹ a	
8290	Title I	\$423 per Eligible Student		44,064	44 Office	77,32
8190	Title II	\$29 per Eligible Student		2,958	24584	5,19
8293	Title III	\$93 per Eligible Student		1,860	1563	3,25
8220	Child Nutrition Program	N. P. SECTOR	1	91,123	12132420	159,70
8181 8290	Special Education Entitlement Public Charter School Grant	No Funding in Year 1 (3 Yr. Fed. Grant; End of Funding Cycle)	375,000	200.000	25@380	35,11
0290	SUBTOTAL Federal Income	(3 11. Fed. Grafit, End of Funding Cycle)	375,000	1.821,927	2,292 <u>63</u> 4Ω	3,012,63
	SOBTOTAL Pederal Income		070,000	1,021,027	-1	0,012,00
8300	Other State Revenue			100	ool Di Jeatro	
8560	State Lottery		İ	29.568	40 656	51,74
8381	Special Education Entitlement (AB602)	SELPA, acct for admin, fee & set aside	1	85.728	117,380	156.27
8310	Charter School Revolving Loan			250,000	т Э.	227.070
	SUBTOTAL Other State Income			365,296	158 36	208,01
					5: 4	
	TOTAL REVENUE		375,000	2,187,223	2,3310900	3,220,64
				-	₹	
	EXPENSES					
1000						
1000	Certificated Salaries	T-3. 7-1		360.000	De	642.60
1000 1100 1103	Certificated Salaries Teachers' Salaries	4% Annually		360,000 14,400	De	
1100	Certificated Salaries	4% Annually				25,70
1100 1103 1200 1300	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries	4% Annually		14,400	504300 20146	25,70 72,82
1100 1103 1200	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries	4% Annually		14,400 57,500 195,000	504300 20496 58,650 198,900	25,70 72,82 202,87
1100 1103 1200 1300	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries	4% Annually		14,400 57,500	504300 20346 58,650	25,70 72,83 202,83
1100 1103 1200 1300	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries	4% Annually		14,400 57,500 195,000 526,900	504-300 201-86 58,650 196,900	25,70 72,82 202,87 944,01
1100 1103 1200 1300 1900	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees	4% Annually		14,400 57,500 195,000	504300 20496 58,650 198,900	25,70 72,82 202,87 944,01
1100 1103 1200 1300 1900	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees Classified Salaries	4% Annually		14,400 57,500 195,000 526,900	504-300 201-86 58,650 196,900	25,70 72,82 202,87 944,01
1100 1103 1200 1300 1900 2000 2200	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees Classified Salaries Support Salaries	4% Annually		14,400 57,500 195,000 526,900	504-200 204-66 58,650 196,900 782,646	25,70 72,82 202,87 944,01 6,63 88,43
1100 1103 1200 1300 1900 2000 2200 2300	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees Classified Salaries Support Salaries Non-certificated Supervisor Salaries	4% Annually		14,400 57,500 195,000 526,900 32,500 85,000	504-300 204-66 58,650 198,900 782,646 65,000 86,700	25,70 72,82 202,87 944,01 6,63 88,43 41,61
1100 1103 1200 1300 1900 2000 2200 2300	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees Classified Salaries Support Salaries Non-certificated Supervisor Salaries Clerical and Office Salaries	4% Annually		14,400 57,500 195,000 526,900 32,500 85,000 40,000	504-300 204-96 58,650 198,900 782,646 65,000 86,700 40,800	25,70 72,82 202,87 944,01 6,63 88,43 41,61
1100 1103 1200 1300 1900 2000 2200 2300 2400	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees Classified Salaries Support Salaries Non-certificated Supervisor Salaries Clerical and Office Salaries SUBTOTAL Classified Employees	4% Annually (0.1073-Y1; 0.1258-Y2; 0.1443-Y3)		14,400 57,500 195,000 526,900 32,500 85,000 40,000	504-300 204-96 58,650 198,900 782,646 65,000 86,700 40,800	25,70 72,82 202,87 944,01 6,63 88,43 41,61
1100 1103 1200 1300 1900 2000 2200 2300 2400 3000 3100	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees Classified Salaries Support Salaries Non-certificated Supervisor Salaries Clerical and Office Salaries SUBTOTAL Classified Employees Employee Benefits STRS			14,400 57,500 195,000 526,900 32,500 85,000 40,000 157,500	504-200 204-66 58,650 196,900 782,646 65,000 86,700 40,800 192,500	642,60 25,70 72,82 202,87 944,01 6,63 88,43 41,61 136,68
1100 1103 1200 1300 1900 2000 2200 2300 2400 3000	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees Classified Salaries Support Salaries Non-certificated Supervisor Salaries Clerical and Office Salaries SUBTOTAL Classified Employees Employee Benefits	(0.1073-Y1; 0.1258-Y2; 0.1443-Y3)		14,400 57,500 195,000 526,900 32,500 85,000 40,000 157,500	504-200 204-66 58,650 198,900 782,646 65,000 86,700 40,800 192,500	25,70 72,82 202,87 944,01 6,63 88,43 41,61 136,68
1100 1103 1200 1300 1900 2000 2200 2300 2400 3000 3100 3320	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees Classified Salaries Support Salaries Non-certificated Supervisor Salaries Clerical and Office Salaries SUBTOTAL Classified Employees Employee Benefits STRS OASDI Regular Non-Instructional	(0.1073-Y1; 0.1258-Y2; 0.1443-Y3) 0.0620		14,400 57,500 195,000 526,900 32,500 85,000 40,000 157,500 67,266 9,765	504-300 204-66 58,650 198,900 782,646 65,000 86,700 40,800 192,500 98,457 11,935	25,70 72,82 202,87 944,01 6,63 88,43 41,61 136,68 136,22 8,47 15,67
1100 1103 1200 1300 1900 2000 2200 2300 2400 3000 3100 3320 3330 3400	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees  Classified Salaries Support Salaries Non-certificated Supervisor Salaries Clerical and Office Salaries SUBTOTAL Classified Employees  Employee Benefits STRS OASDI Regular Non-Instructional Total Medicare Total Health & Weifare Benefits	(0.1073-Y1; 0.1258-Y2; 0.1443-Y3) 0.0620 0.0145 \$7500/FTE+10% Annual Increase		14,400 57,500 195,000 526,900 32,500 85,000 40,000 157,500 67,266 9,765 11,374 97,500	504-300 204-66 58,650 198,900 782,646 65,000 86,700 40,800 192,500 98,457 11,935 14,140 140,250	25,70 72,82 202,87 944,01 6,63 88,43 41,61 136,68 136,22 8,47 15,67 190,57
1100 1103 1200 1300 1900 2000 2200 2300 2400 3000 3100 3320 3330	Certificated Salaries Teachers' Salaries Substitute Teachers' Salaries Support Teacher Salaries Support Teacher Salaries Supervisor and Administrator Salaries Other Certificated Salaries SUBTOTAL Certificated Employees  Classified Salaries Support Salaries Non-certificated Supervisor Salaries Clerical and Office Salaries SUBTOTAL Classified Employees  Employee Benefits STRS OASDI Regular Non-Instructional Total Medicare	(0.1073-Y1; 0.1258-Y2; 0.1443-Y3) 0.0620 0.0145		14,400 57,500 195,000 526,900 32,500 85,000 40,000 157,500 67,266 9,765 11,374	504-300 204-66 58,650 198,900 782,646 65,000 86,700 40,800 192,500 98,457 11,935 14,140	25,70 72,82 202,87 944,01 6,63 88,43 41,61 136,68 136,22 8,47 15,67

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Object Code		NOTES	START-UP	2015-2016 Year 1 Total	2016-2017 Year 2 () Total ()	2017-2018 Year 3 Total
4000	Books and Supplies				Ö	10111
4100	Textbooks		1	40,000	15,000	15,00
4200	Books & Other Reference Materials			6,000	2,250	2,2
4300	Instructional Materials and Supplies		9,840	5,000	2, <b>23</b> 0 1, <b>3</b> 5	1,87
4400	Noncapitalized Equipment		117,200	50,000	18,750	18,7
4700	Student Food Services			79,660	109,993	
	SUBTOTAL Books and Supplies		127,040	186,160	159,08	189,7
					unty50	-
5000	Services & Other Operating Expenses			1000	. <del> </del>	
5200	Travel and Conferences			4,950	5,850	7,2
5300	Dues and Memberships		1	3,000	3.00 16.50 46.00 18.50	3,0
5400	Insurance	\$60/student per CCSA/JPA	1	12,000	16,500	21,00
5535	Utilities (All)		1	33,600	46,000	58,8
5515	Custodial Service & Supplies		1	18,000	18,250	18,73
5605	Copier Lease & Repair Contract			24,000	24,048	24,5
5610	Rent	\$1.25 psf/mo, 70 sf/student	1	210,000	288,750	367,50
5803	Accounting/Auditing Fees			8,200	8, 8, 4	8,53
5809	Banking Fees			300		3
5815	Consultants, Education	WASC; NWEA; Sp.Ed. Contract Instructor	50,000	22,075	21, 25	30,67
5830	Student Field Trips			6,000	8,250	10,50
5836	Fingerprinting Fees		1	720	1.000	1,20
5845	Legal Expenses			5.000	5.50 g	5.2
5850	Advertising & Recruitment		1	7.000	25	12.2
5863	Professional Development		1	10,700	5,025 6,05	7.0
5877	Athletic Fees			4,000	6,225 5,800	7.00
5880	Student Health Services		1	2,000	2 750	3,50
5881	Student Information System		1	25,000	2,750 15,360	15,60
5887	Technology Services		1	7,200	7,334	7.49
5910	Communications-Website & Internet Hosting			2,592	2.944	2.69
5915	Postage and Meter Rental			5,000	6,875	8,75
5920	Cell Phone Services			2,400	2,448	2,49
3320	SUBTOTAL Services & Other Operating Expenses		50,000	413,737	506,434	624,07
6000	Capital Outlay					
6490	Equipment		24,875		6,446	6,44
6500	Equipment Replacement		24,015		19,250	24,50
0000	SUBTOTAL Capital Outlay		24,875		25,696	30.94
7000	Other Outgo					
7400	Interest Payment on CSRL	1.38%		3,450	2.760	2.0
7600	Transfer Out-Repayment on CSRL			50,000	50,000	50.00
7350	Authorizer Oversight Fee est. Actual	1% of LCFF-District Oversight		14,819	20,912	27,33
	SUBTOTAL Other Outgo			68,269	70,912	77,33
	TOTAL EXPENSES		201,915	1,681,221	2,057,453	2,414,35
	5% Reserve		201,913	84,061	102,873	120,7
	Excess of Revenues over Expenditures & Reserve		173,085	421,941	173,164	685,58
	Total Additional Reserves			337,880	70,292	o 564,8
	Year to Year Totals				U	O
	Beginning Cash (Less Reserves)			173,085	595,886	G 768,1
	Net Cash Balance		173,085	595,026	768,190	w 1,453,7
	Cumulative Reserve Total			84,061	186,934	307,6
	Year to Year				768, 760 A 186, 934 A 190	7 5
	Total Cash Balance Including Reserves				9 #	달
			173,085	679,087	955,124	D 1,761,4

	Multiyear Projections-February 9, 2015 COUNTY Author	ization			0)	
Object Code		NOTES	START-UP	2015-2016 Year 1 Total	2016-2010 Year 200 Total 3	2017-2018 Year 3 <u>Total</u>
	REVENUES				ento	
	LCFF State Revenues				ō 4	)
8015	Local Control Funding			1,481,922	2,091,645	2,732,0
8096	Transfer to Charter Schools In Lieu of Property Tax	\$810/ADA			⊑ 4	
8100	Federal Revenue		-		127 @ 25 @ 6	
8290	Title I	\$423 per Eligible Student		44,064	44,064	77,3
8190	Title II	\$29 per Eligible Student		2,958	2,≌8⊈	5,1
8293 8220	Title III Child Nutrition Program	\$93 per Eligible Student	1	1,860 91,123	1,00	3,2 159,7
8181	Special Education Entitlement	No Funding in Year 1		91,123	25,536	35.1
8290	Public Charter School Grant	(3 Yr. Fed. Grant; End of Funding Cycle)	375.000	200.000		35,1
	SUBTOTAL Federal Income	(O 11.) Dr. Orani, Line of Carriery	375,000	1,821,927	2,292,040	3,012,63
					<u> </u>	
8300	Other State Revenue		1		JCa	
8560	State Lottery		1	29,568	40,86	51,74
8381	Special Education Entitlement (AB602)	SELPA, acct for admin. fee & set aside	1	85,728	117,480 ch	156,2
8310	Charter School Revolving Loan				卫季	
	SUBTOTAL Other State Income			115,296	158,136	208,01
					<u>₹</u> 9	
	TOTAL REVENUE		375,000	1,937,223	2,333(690 7	3,220,64
			-		<u></u>	
	EXPENSES				5	
1000	Certificated Salaries		1		ĕ	
1100	Teachers' Salaries	A contract of the contract of	1	360,000	504,900	642,60
1103	Substitute Teachers' Salaries	4% Annually	1	14,400	20,926	25,70
1200	Support Teacher Salaries		1	57,500	58,650	72,82
1300	Supervisor and Administrator Salaries Other Certificated Salaries			195,000	198,900	202,87
	SUBTOTAL Certificated Employees			626,900	782,646	944,01
2000	Classified Salaries					
2200	Support Salaries			32.500	65,000	6.63
2300	Non-certificated Supervisor Salaries		1	85,000	86,700	88.43
2400	Clerical and Office Salaries		1	40,000	40.800	41.61
2.00	SUBTOTAL Classified Employees			157,500	192,500	136.68
3000	Employee Benefits					
3100	STRS	(0.1073-Y1; 0.1258-Y2; 0.1443-Y3)		67.266	98,457	136.2
3320	OASDI Regular Non-Instructional	0.0620	-	9.765	11,935	8.47
3330	Total Medicare	0.0145		11,374	14,140	15,67
3400	Total Health & Welfare Benefits	\$7500/FTE+10% Annual Increase		(0.000000000000000000000000000000000000	0.34.7.55	
THE TOTAL				97,500	140,250	190,57
3500	Total Unemployment Insurance	0.0161		11,374	15,700	O 43.25
3600	Total Workers' Compensation	0.0400	- 1	31,376	39,006	0 43,22 0 411.56
	SUBTOTAL Employee Benefits			228,655	319 37	O 411.5

Object Code		NOTES	START-UP	2015-2016 Year 1 Total	2016-2017 Year 2() Total 0	2017-2018 Year 3 Total
4000	Books and Supplies			10.00	9	1000
4100	Textbooks			40,000	15,200	15,00
4200	Books & Other Reference Materials			6,000	2,250 1,875	2,25
4300	Instructional Materials and Supplies		9,840	5,000	1,675	1,87
4400	Noncapitalized Equipment		117,200	50,000	18,750	18,75
4700	Student Food Services			79,660	109,283 0	139,87
	SUBTOTAL Books and Supplies	A.C	127,040	186,160	159,078 ₽	189,75
					untyso and the second s	
5000	Services & Other Operating Expenses				.₹.Φ	
5200	Travel and Conferences		1	4,950	5,850 P	7,20
5300	Dues and Memberships	Antonia de Calabras	1	3,000	3,990 €	3,00
5400	Insurance	\$60/student per CCSA/JPA		12,000	16,500 ₽	21,00
5535	Utilities (Alf)			33,600	46,000 क	58,80
5515	Custodial Service & Supplies			18,000	10,000	10,72
5605	Copier Lease & Repair Contract			24,000	24,048	24,52
5610	Rent	\$1.25 psf/mo, 70 sf/student		210,000	288,920	367,50
5803	Accounting/Auditing Fees			8,200	8,864	8,53
5809	Banking Fees			300	206 1	31
5815	Consultants. Education	WASC; NWEA; Sp.Ed. Contract Instructor	50.000	22.075	21,95	30.67
5830	Student Field Trips			6.000	8,250 =	10.50
5836				720	* 500 E	1.26
	Fingerprinting Fees			0.000	1,000	1,20
5845	Legal Expenses	1		5,000	1,000 CF 5,500 and 9,005 GF	5,20
5850	Advertising & Recruitment			7,000	9,625 0	
5863	Professional Development	1	1	10,700	6,225	7,05
5877	Athletic Fees			4,000	5, <b>⊆</b> 00	7,00
5880	Student Health Services	1	1	2,000	2,750 15,70	3,50
5881	Student Information System	1	1	25,000	15,700	15,60
5887	Technology Services	1	1	7,200	7,314	7,49
5910	Communications-Website & Internet Hosting		1	2,592	2,014	2,69
5915	Postage and Meter Rental			5,000	6,875	8,75
5920	Cell Phone Services			2,400	2,448	2,49
	SUBTOTAL Services & Other Operating Expenses		50,000	413,737	506,434	624,07
6000	Capital Outlay					
6490	Equipment		24,875		6,446	6,44
6500	Equipment Replacement				19,250	24,50
	SUBTOTAL Capital Outlay		24,875		25,696	30,94
7000	Other Outgo					
7400	Interest Payment on CSRL	1.38%				
7600	Transfer Out-Repayment on CSRL					
7350	Authorizer Oversight Fee est. Actual	1% of LCFF-District Oversight	-	14,819	20,912	27,32
	SUBTOTAL Other Outgo			14,819	20,912	27,32
	TOTAL EXPENSES		201,915	1,627,771	2.007.453	2,364,35
	5% Reserve			81,389	100,373	118,21
	Excess of Revenues over Expenditures & Reserve		173,085	228,063	225,664	738,08
	Total Additional Reserves		4.00	146,675	125,292	86,916 م
	Year to Year Totals				<u> </u>	C G 626,81
	Beginning Cash (Less Reserves)			173,085	401,8	Ø 626,81
	Net Cash Balance		173,085	401,148	626,603	0 1,364,89
	Cumulative Reserve Total			81,389	181,781	1,364,89
	Year to Year		1		626, <b>6</b> 03,741,241,0	15
	Total Cash Balance Including Reserves				I	T 1664 87

## PARAMOUNT COLLEGIATE ACADEMY

# Petitioners' Response to County Staff Findings

Section 3

### Paramount Collegiate Academy Alternate Budget Narrative [Scenarios A and B]

#### **ASSUMPTIONS**

The budget and cash flow projections for Paramount Collegiate Academy contained herein are based upon conservative estimates of the actual costs to implement the operational and programmatic features described in this charter petition. Assumptions used to create the multiyear budget projections are based upon financial information and data from other similar charter schools authorized by SJUSD and across California over the past year.

#### **Student Demographics**

Paramount Collegiate Academy is projected to open with 200 students; 50 students in each of grades 6-9. In subsequent years, the Charter School will add grades 10, 11, and 12. (Each of the newly added grades will begin with a projected enrollment of 50 students.) During this time of gradual expansion, PCA will add 25 students each year at existing grade levels until each grade reaches a capacity of 100 students. The Charter School will reach full capacity in Year Eleven (11), with a projected enrollment of 700 middle/high school students.

The attendance rate is assumed to be at 96% in all years. This is consistent with the average attendance rate reported at P-2 for San Juan Unified School District's Second Interim Budget Report for 2013-14.

PCA Enrollment P	rojections by	Year and Grade	Level (Alternative	Expansion Plan)

Student Population								
	Grade 6	Grade 7	Grade 8	Grade 9	Grade 10	Grade 11	Grade 12	TOTAL
Year 1	50	50	50	50				200
Year 2	75	50	50	50	50			275
Year 3	75	75	50	50	50	50		350
Year 4	75	75	75	50	50	50	50	425
Year 5	100	75	75	75	50	50	50	475
Year 6	100	100	75	75	75	50	50	525
Year 7	100	100	100	75	75	75	50	575
Year 8	100	100	100	100	75	75	75	625
Year 9	100	100	100	100	100	75	75	650
Year 10	100	100	100	100	100	100	75	675
Year 11	100	100	100	100	100	100	100	700

As mentioned in the charter petition, PCA intends to enroll a student population that mirrors the racial/ethnic and socioeconomic demographics of, San Juan Unified School District. Therefore, this budget includes projections in alignment with SJUSD's P-2 2013-14 Budget Report, which calculated the District Free and Reduced Lunch percentage and economically disadvantaged percentage at 50.82% (51%). This budget assumes the English learner (EL) percentage at 10%, which is the District's percentage of EL's according to demographics reported to CDE by SJUSD for 2012-13.

#### REVENUES

Though the national economy remains volatile, the 2013-14 Governor's Budget ushered in many positive trends in funding to schools, including a major overhaul in school finance. The major changes come with funding increases to California schools and how base funding for all public schools will now be determined. This new *Local Control Funding Formula* (LCFF) is the new mechanism by which all public schools are to determine base funding for general revenue. The LCFF places all local education agencies, including charter schools into the same funding system. The 2014/15 Proposed Governor's Budget continues denote continued increases in California education funding and charter school funding.

To calculate PCA's base per pupil funding amount for the 2015-16 school year using the new LCFF, the new Charter School utilized SJUSD 2014-15 average LCFF per-pupil rate of \$7,347 (based upon School Services of California, as outlined in the District's 1st Interim Budget of 2014-15). Total enrollment for 2015-16 is projected at 200 pupils. Additionally, the Charter School will receive a 2.6% high school supplement to its base funding and supplemental funding to the base for EL students and unduplicated pupils who qualify for free and/or reduced price lunches. Overall, using the California Charter School Association's LCFF Calculator Worksheet, Paramount Collegiate Academy's Total LCFF Target per Average Daily Attendance (ADA) will be \$7,347 of base funding per student for a total LCFF Target amount of \$1,481,922 in Year One (1) of operation.

PCA will apply for and file a consolidated application for Federal Title I, II, and Title III funding upon completion and submission of its Local Education Agency (LEA) Plan to the California Department of Education (CDE) for State Board of Education (SBE) approval. Federal funding estimates are based upon recent sequestration rates which amount to \$432 per eligible Title I student. PCA budgeted Title II funding at \$29 per eligible student. PCA used CDE's 2013-14 Title III Funding Profile to calculate the budgeted Title III amounts of \$93 per eligible EL student. PCA will also participate in the Federal Child Nutrition Program, serving both breakfast and lunch. Current 2014-15 Federal Reimbursement Rates were utilized in calculating revenues for this program. Those rates are listed on the next page as follows:

### School Breakfast Program

	Free	Reduced-Price	Paid
Basic Breakfast	\$1.62	\$1.32	\$0.28
Especially Needy Breakfast	\$1.93	\$1.63	\$0.28

## **National School Lunch Program**

	Free	Free+6 cents*	Reduced- Price	Reduced- Price+6 cents*	Paid	Paid+6 cents*
Agencies that served less than 60% free/reduced- price lunches in 2012-13	\$2.98	\$3.04	\$2.58	\$2.64	\$0.28	\$0.34
Agencies that served 60% or more free/reduced-price lunches in 2012-13	\$3.00	\$3.06	\$2.60	\$2.66	\$0.30	\$0.36
Commodity Value	\$0.3044	\$0.3044	\$0.3044	\$0.3044	\$0.3044	\$0.3044

State Lottery revenues were calculated using the current 2013-14 School Services of California's (SSC) rate of \$154 per ADA.

For Special Education, PCA intends to operate as a member of a charter SELPA. The state rate of entitlement is assumed to be \$500/ADA less 6% administrative fees and 5% set aside. PCA will not receive federal special education funding in its first year of operations. In year two, the federal rate is assumed to be \$133/ADA. Should any students need mental health services, funding streams are available.

PCA has applied for a Proposition 39 Facilities. For Budget Scenario A, PCA utilizes a rental facility and for Budget Scenario B, PCA rents a facility without the Charter School Revolving Loan. For both scenarios A and B, SB740 Facility Grant funds are not included, as the school does not expect its student population of Free and/or Reduced Price Meals to be above 70%, the qualifier for this facilities funding. PCA has applied for and passed Peer Review for the Federal Public Charter School Grant Program (PCSGP) in order to produce startup and implementation revenue in 2014-15, its planning year and the first two years of operations. PCA will receive these federal funds upon authorization. PCA has included \$225,000 in its startup year, as well as \$200,000 in 2015-16 and \$150,000 in 2016-17, for a total of \$575,000 in both Budget Scenarios A and B. PCA expects to receive \$575,000 over the period of 2.5 years, based upon the 2010-2015 PCSGP grant cycle. PCA is finalizing its 2014/15 application submission to the California School Finance Authority (CSFA) for a Charter School Revolving Loan Fund

(CSRLF). CSFA's first priority for the CSRLF program is to fund new charter schools. The CSRFL is included in Budget Scenario A. Over the past several years, CSFA's funding priority has been demonstrated in funding all new charter school applications as well as funding the maximum loan amount of \$250,000. Budget Scenario B was prepared without the CSRLF.

\*Note: These revenue estimates are highly conservative. The PCA Development Team has plans to engage in aggressive acquisition of startup capital during 2013-14 and during its 2014-15 planning and startup year. Therefore, this budget does not include monies from private foundation grants PCA intends to apply for as well as private donations and monies acquired through fundraising campaigns. Any and all funds donated or acquired through private grants during this period will be above and beyond what the Charter School has budgeted, allowing for the School to build its reserves for Year One (1) or swiftly repay the CSRLF, if necessary.

#### **EXPENDITURES**

Expenses have been conservatively budged, with a 2% COLA (cost of living adjustment) built in during the first three years of school operations. This cautious estimate will be reviewed at the end of Year Three (3), with possible salary and COLA increases as budget reserves are strongly built.

#### Staffing

PCA recognizes that teachers can and do make a difference in students' lives and highly value their work. As such, PCA configured annual starting teacher salaries using an average higher than SJUSD's current starting teacher salaries and higher than those of other charter schools in the area. In all three budget scenarios, PCA has set starting teachers' salaries at \$45,000/year.

In Year One (1) of operations, the Charter School has budgeted the hiring of 8 full-time classroom teachers and one resource specialist teacher. In Year Two (2), the teaching staff will grow to eleven teachers as student enrollment increases. In Year Three (3), PCA will employee fourteen full-time teachers to accommodate the Charter School's growth. In each of the first two years of operations, PCA will employ a half-time PE/Elective teacher, which will grow to a full-time position in year three of operations.

The table on the following page outlines staffing assumptions during the first three years of PCA's operations. PCA is dedicated to smaller class sizes. Thus in both budget scenarios, PCA's staffing remains at a 25:1 student-to-teacher ratio.

PCA Staffing Projections

Paramount Staffing in FTE	Average Starting Salary	Year 1	Year 2	Year 3
Chief Executive Officer	\$110,000	1	1	1
Principal	\$85,000	1	1	1
Director of Business & Fiscal Services	\$85,000	1	1	1
Executive Assistant	\$40,000	1	1	1
Coordinator of Technology	\$65,000	0.5	1	1
Teachers	\$45,000	8	11	14
Resource Specialist Teacher (Sp.Ed.)	\$45,000	1	1	1
Elective/PE Teacher	\$25,000	0.5	0.5	1
Total FTE		14	17	21

Substitute teachers were budgeted at 4% of the total teacher salaries for each year of the multiyear projection. In preparation for Year One (1) of school operations, PCA will hire a Chief Executive Officer at \$110,000/year, a Director of Fiscal Services at \$85,000/year and a Principal at a salary of \$85,000/year. PCA will also hire an Executive Assistant at \$40,000/year to support school and office operations. The School plans to hire a half-time Coordinator of Technology at \$32,500/year (full-time salary equals \$65,000) to support and advance the school's STEAM focus and mission. In year two of operations and beyond, this position will be increased to full-time in order to further support the School's focus on data systems, data collection and analysis, and its data-driven instructional program, in general. The annual salary for this position will be \$65,000/year.

In all three budget scenarios, PCA estimated the following for Employer Compensation and Benefits: a) \$7500/year for full-time employees participating in the health plan, with a 10% increase per-employee in each year thereafter; b) Year One-10.73% of certificated employee salaries to State Teacher's Retirement System (STRS); Year Two-12.58% of certificated employee salaries to STRS; Year Three-14.43% of certificated employee salaries to STRS; and c) 8% of classified employee salaries to Social Security. These employer compensation and benefit figures in all scenarios include the latest CalSTRS member contribution rate increases per Assembly Bill 1469, which took effect July 1, 2014. All other employee benefits including Unemployment Insurance and Worker's Compensation Insurance are budgeted for each of the three years.

PCA has budgeted very modestly for salaries during planning and startup of 2014/15. PCA has included a \$50,000 contract for the Chief Executive Officer for the startup year until the School gears up for staff hiring in the winter/spring of 2015.

#### Books, Supplies and Capital Outlay

In both budget scenarios presented, PCA will spend a portion of Year One (1) expenses on startup costs such as furniture, equipment, and technology. This amounts to \$127,040 for non-capitalized equipment, books, and instructional materials. In both budget scenarios, PCA will spend \$200 per new student on textbooks, \$30 per new student on other books, \$25 per new student on supplies, and \$250 per new student on digital equipment/technology due to the school's STEAM mission and focus.

For startup and implementation of new teacher classrooms in subsequent years, PCA has budgeted for teacher personal computers at \$800 per classroom, with \$400 for teacher workstations, \$200 for classroom printers, multi-student tables for six students at \$125 per table, individual chairs at \$35 each, and classroom video projection systems at \$1,000 per classroom. Other furniture such as bookshelves (\$100 per teacher), dry erase boards (\$150 per teacher), and one projection screen (\$150 per classroom) are also included in supply and equipment costs each year of Budget Scenarios A and B.

PCA has budged for a food services cost (such as Nob Hill Catering/Lunchmaster) of 50% of Free/Reduced Price Lunch costs-\$1.49/day for lunch and \$0.81/day for breakfast at 181 days of food service. As stated previously, PCA estimates a free-reduced student participation rate of 51% of the total enrollment (highly conservative for the Decile 1 school target area).

#### Services and Other Operating Expenses

For both budget scenarios prepared, PCA will spend \$450 per teacher and administrator on conferences and travel. Additionally, PCA has budgeted for annual membership with the California Charter Schools Association (CCSA), using CCSA's \$5 per student calculation. PCA has also included \$1500 per year for administrator memberships in other professional educational organizations.

PCA has included budgeting for general liability insurance, as well as insurance for its directors and officers at \$60 per student (CCSA's Joint Powers Authority Rate). For both budget scenarios, utilities were calculated at a combined total rate of \$0.20 per square foot based on the current monthly industry standard. Custodial services were included in each of the three budget scenarios at \$1500 per month with a 2% annual cost of living increase included in Years Two (2) and Three (3). A photocopier lease is included in both of PCA's budget scenarios at \$1000/month per copier, including repairs and a 2% annual cost of living increase for Years Two (2) and Three (3). PCA has also included \$3500 for accreditation expenses for the Western Association of Schools and Colleges (WASC) accreditation committee in Year One (1) and \$7200 for Northwest Evaluation Association (NWEA) contract (\$6,225 in Year (2) and \$7,050 in Year (3). In Year One, the School has also budgeted 105 hours at \$75/hour for special education services not covered by the School's resource specialist support teacher, which will be handled by contracted services (ie. speech therapy, nursing, and psychologist). In Year Two, the School has budgeted 210 hours of specialist services and 315 hours of services in Year Three, Both budget scenarios include costs for an annual financial audit at \$8200/year with a 2% increase for Years Two (2) and Three (3). Both scenarios also include legal

expenses of \$5000 per year and a 2% increase above these expenses in Years Two (2) and Three (3). The School has also planned for banking fees at \$300 per year, increasing 2% after Year One (1) and fingerprinting fees at \$60 per FTE in each year of operations.

In each of the three budget scenarios, PCA included funding of its Student Information System (SIS) at \$15,000 per year and an additional \$10,000 in Year One (1) for staff training in the SIS. A 2% increase is built in for Years Two (2) and Three (3). Even though PCA has planned for the hiring of one half-time Coordinator of Technology, all three budget scenarios include an additional \$600 per month for Technology Services for the School's STEAM focus. The School has also budgeted an additional \$1000 per teacher/annually for teacher workshops, \$20/student for student workshops and activities, \$20/student for athletic fees, and \$30/student for field trips. Communications costs include cell phone service fees of \$200/month plus a 2% increase annually after Year One (1), as well as postage and postage meter rental calculated at a cost of \$25/student. Due to its non-profit status, PCA receives a low rate for internet hosting and has budgeted \$16/month for the license it currently holds plus a 2% annual increase after the first year of operations. Contrarily, PCA intends to acquire an internet service provider that will provide the maximum bandwidth for the School and its operations. Therefore, both budget scenarios include \$200/month plus an annual 2% increase in costs after Year One (1) of operations. PCA has budgeted \$35/student annually for student/staff advertising and recruitment.

Both Budget Scenarios A and B were developed using the assumption of the 1% County Oversight Fee with a rental facility. These facility costs include the average square foot-to-student ratio of 70 square feet/student (based upon other California charter school ratios). PCA calculated rent using the current Sacramento and Placer County average of \$1.25 per square foot/month for each year in Budget Scenarios (2) and (3). Including assumptions for growing enrollment, facility rent in Year One (1) totals \$210,000 and \$288,750 in Year Two (2). Rent in Year Three (3) totals \$367,500.

#### Other Outgo

Both Budget Scenarios A and B were developed using the 1% County Oversight Fee with rental facilities (non-District). Both scenarios utilize the assumption of the Federal PCSGP funding, while Budget Scenario B includes repayment of the Low-Interest CDE Revolving Loan of \$250,000. Repayment has been calculated at \$50,000/annually for five years at an interest rate of 1.38%.

#### Reserves

Paramount Collegiate Academy has prepared a highly conservative multiyear budget, with annual reserves well above 5% of operating expenses. In both Budget Scenarios A and B, PCA establishes and maintains extremely healthy cash reserves.

# PARAMOUNT COLLEGIATE ACADEMY

Petitioners' Response to County Staff Findings

Section 4



#### UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

SEP 2 3 2013

#### Dear Title I Director:

I am writing in response to recent questions from the field regarding the determination of 2013–2014 Title I, Part A (Title I) allocations for newly opening or significantly expanding charter school local educational agencies (LEAs). Specifically, these questions have focused on the base amount from the 2012–2013 school year that a State educational agency (SEA) should use for its newly opening or significantly expanding charter school LEAs when applying (1) the hold-harmless requirements in sections 1122(c) and 1125A(g)(3) of the Elementary and Secondary Education Act of 1965, as amended (ESEA); and (2) the special requirement in section 1003(e) of the ESEA concerning how much an LEA's allocation may be reduced when the SEA reserves funds for section 1003(a) school improvement purposes.

Generally, in calculating Title I allocations under each of the four formulas, an SEA must ensure that no eligible LEA receives an allocation that is below its hold-harmless level. However, reductions in school year (SY) 2013–2014 funding resulting from passage of Public Law (PL) 13-6, the Consolidated and Further Continuing Appropriations Act, 2013, have complicated this process. This is especially true with respect to allocating 2013–2014 funds to newly opening and significantly expanding charter school LEAs consistent with section 5206 of the ESEA and its implementing regulations in 34 C.F.R. Part 76, Subpart H. Section 5206 requires that an SEA take measures to ensure that each eligible charter school LEA that is in its first year of operation or is undergoing a significant expansion receives the Title I and other Federal education formula funds for which it is eligible within five months after opening or undergoing a significant expansion in enrollment. This provision ensures that each newly opening or significantly expanding charter school LEA receives an allocation that reflects its current student count even though allocations may be calculated before the identity and characteristics of the students enrolling in the charter school LEA are fully determined.

Because newly opening and significantly expanding charter school LEAs are treated differently from other LEAs under section 5206, it is important to ensure that the operation of the hold-harmless requirements in sections 1122(c) and 1125A(g)(3) and the special hold-harmless provision in section 1003(e) do not unduly negate increases in Title I allocations based on the SY 2013–2014 student population in these charter school LEAs. Accordingly, I thought it appropriate to provide some clarification to our existing within-State allocation guidance on how the statutory hold-harmless requirements operate in these special cases. The enclosed guidance focuses on:

#### Page 2 - Title I State Director

- How an SEA should determine the "prior year" (SY 2012–2013) base amount under each
  Title I formula for a newly opening charter school LEA in order to calculate the allocations
  for which it is eligible under section 5206 of the ESEA consistent with the hold-harmless
  provisions under sections 1122(c) and 1125A(g)(3) of the ESEA.
- How an SEA should determine the "prior year" (SY 2012-2013) base amount under each
  Title I formula for a significantly expanding charter school LEA in order to calculate the
  allocations for which it is eligible under section 5206 of the ESEA consistent with the holdharmless provisions under sections 1122(c) and 1125A(g)(3) of the ESEA.
- How an SEA uses the base amounts calculated above to meet the special hold-harmless
  provision in section 1003(e) for both newly opening and significantly expanding charter
  school LEAs.

If you have any questions about this clarification, please do not hesitate to contact Todd Stephenson on my staff at: <a href="mailto:todd.stephenson@ed.gov">todd.stephenson@ed.gov</a> or (202) 205-1645 or Paul (Sandy) Brown at: <a href="mailto:paul.brown@ed.gov">paul.brown@ed.gov</a> or (202) 260-0976.

Sincerely,

Monique M. Chism, Ph.D.

Director

Student Achievement and

School Accountability Programs

Enclosure

APPLYING THE HOLD-HARMLESS REQUIREMENTS IN SECTIONS 1122(c) AND 1125A(g)(3) AND THE SPECIAL HOLD-HARMLESS REQUIREMENT IN SECTION 1003(e) OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, AS AMENDED, TO NEWLY OPENING AND SIGNIFICANTLY EXPANDING CHARTER SCHOOL LOCAL EDUCATIONAL AGENCIES

#### Introduction

The purpose of this guidance is to address questions concerning the base amount from school year (SY) 2012–2013 that a State educational agency (SEA) should use to calculate Basic, Concentration, Targeted, and Education Finance Incentive Grant (EFIG) allocations under Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965, as amended (ESEA), for newly opening or significantly expanding charter school local educational agencies (LEAs) when applying (1) the hold- harmless requirements in ESEA sections 1122(c) and 1125A(g)(3), and (2) the special requirement in ESEA section 1003(e) concerning how much an LEA's allocation may be reduced when the SEA reserves funds for section 1003(a) school improvement purposes.

Newly opening and significantly expanding charter school LEAs are treated differently from other LEAs under the law. Specifically, ESEA section 5206 requires that an SEA take measures to ensure that each eligible charter school LEA that is in its first year of operation or is undergoing a significant expansion in enrollment receives the Title I and other Federal education formula funds for which it is eligible within five months after opening or undergoing a significant expansion. This provision ensures that each newly opening or significantly expanding charter school LEA receives an allocation that reflects its current student count even though allocations may be calculated before the identity and characteristics of the students enrolling in the charter school LEA are fully determined. See also 34 C.F.R. Part 76, Subpart H.

In calculating Title I allocations under each of the four formulas, an SEA must ensure that no LEA receives an allocation below its hold-harmless level. However, reductions in SY 2013–2014 funding resulting from passage of Public Law (PL) 13-6, the Consolidated and Further Continuing Appropriations Act, 2013, have complicated this process. Several SEAs did not receive a SY 2013–2014 allocation under one of the four Title I formulas that is large enough for them to meet the hold-harmless requirement for all LEAs that are currently eligible and funded. In such a case, an SEA must ratably reduce the amount needed to meet the hold-harmless level for each LEA down to the amount allocated to the State to ensure that each eligible LEA receives

ESEA sections 1122(c) (concerning Basic, Concentration, and Targeted grants) and 1125A(g)(3) (concerning EFIG) generally guarantee that an eligible LEA receives no less than 95, 90, or 85 percent of the amount of Title I funds allocated to it under each formula in the previous year, depending on the percentage of formula children in each LEA.

<sup>&</sup>lt;sup>2</sup> ESEA section 1003(e) requires that, when reserving four percent of a State's Title 1 allocation under section 1003(a) for school improvement purposes, an SEA may not reduce an LEA's Title I allocation, in the aggregate, below the aggregate amount it received in the preceding year.

an allocation that is as close as possible to its hold-harmless level.<sup>3</sup> In this situation, a newly opening charter school LEA would have a SY 2012–2013 amount of 0 against which an SEA would apply the 85, 90, or 95 percent hold-harmless level in sections 1122(c) and 1125A(g)(3). Consequently, absent ESEA section 5206, a newly opening charter school LEA would receive no funding if there is not enough funding available under a specific formula to meet the hold-harmless requirement for each currently eligible LEA that received an allocation in SY 2012–2013. Similarly, the SY 2012–2013 base amount for a significantly expanding charter school LEA would be the amount it received without regard to the expansion in its formula count for the current year.

The reduction in SY 2013–2014 funds also means that a significant number of SEAs will not be able to reserve the full four percent for school improvement activities required under ESEA section 1003(a) and still ensure that no LEA receives an aggregate Title I allocation below its prior year amount. In such a case, an SEA must reserve an amount as close as possible to four percent of its Title I allocation. Again, a newly opening or significantly expanding charter school LEA could lose most, if not all, of its potential increase because of the operation of section 1003(e). In the case of a newly opening charter school LEA, its SY 2012–2013 allocation for which it would be held harmless is 0 and, therefore, its 2013–2014 aggregate Title I allocation could be reduced to 0 in order for the SEA to reserve funds for school improvement without reducing any other LEA below its aggregate SY 2012–2013 Title I allocation. Likewise, in the case of a significantly expanding charter school LEA, its aggregate Title I allocation could be reduced to the amount it received in the prior year. Therefore, the increase due to its significant expansion in SY 2013–2014 would be eliminated.

In view of the different treatment afforded newly opening and significantly expanding charter school LEAs under ESEA section 5206, it is important to ensure that operation of the hold-harmless requirements in sections 1122(c) and 1125A(g)(3) and the special hold-harmless provision in section 1003(e) do not unduly negate the Title I allocations for these charter school LEAs based on their SY 2013–2014 student population. Accordingly, the following questions and answers provide clarification about how an SEA should derive a SY 2012–2013 hold-harmless base for newly opening and significantly expanding charter school LEAs in order to calculate Title I allocations for these LEAs in SY 2013–2014.

#### **Questions and Answers**

How does an SEA determine a "prior year" (SY 2012-2013) base amount under each
Title I formula against which to apply the hold-harmless percentage in ESEA sections
1122(c) and 1125A(g)(3) for a newly opening charter school LEA?

To determine the "prior year" (SY 2012–2013) base amount for a newly opening charter school LEA, an SEA would take the following steps:

A. Calculate the newly opening charter school LEA's initial SY 2013–2014 allocation under each formula before application of the hold-harmless requirements in ESEA sections

<sup>&</sup>lt;sup>3</sup> This situation occurs for SY 2013-2014 when the EFIG allocations for six States (Alabama, Mississippi, New Jersey, Oklahoma, Pennsylvania, and Wisconsin) are not large enough to meet the section 1125A(g)(3) LEA hold-harmless requirement under that formula.

1122(c) and 1125A(g)(3) based on the funds that the derived number of formula children generated for that charter school LEA.<sup>4</sup> This amount will serve as the "prior year" base amount for the purpose of meeting the hold-harmless requirements as well as the special hold-harmless provision in ESEA section 1003(e).

- B. Based on its derived formula count compared to its population of children ages 5 through 17, determine whether the newly opening charter school LEA's hold-harmless level will be 85, 90, or 95 percent of its "prior year" base amount.
- C. Multiply the initial allocation determined in Step A for each formula by the appropriate hold-harmless percentage determined in Step B to determine the newly opening charter school LEA's hold-harmless amount.

This process will ensure that a newly opening charter school LEA is not disadvantaged by the fact that it had no Title I allocation in 2012–2013 against which to apply the hold-harmless level.

The following chart illustrates how this process would work in the case of a newly opening charter school LEA:

	(1)	(2)	(3)
M.Ohmerin	SY 2012– 2013 Allocation	Initial SY 2013— 2014 Allocation Based on the Derived Formula Count *	Hold-Harmless Level Amount (Col. (2) x 95%)
Basic Grant allocation	0	\$92,534	\$87,907
Concentration Grant allocation	0	\$21,900	\$20,805
Targeted Grant allocation	0	\$48,798	\$46,358
EFIG allocation	0	\$42,620	\$40,489
Total	0	\$205,852	\$195,559
Current year poverty count (derived formula count)		168	
Current year 5 - 17 population		432	
Formula percentage		39%	
Hold-harmless level based on formula percentage		95%	

\* The amount shown in column 2 would be the SY 2012–2013 base amount to be used for applying the hold-harmless level for ESEA sections 1222 (c) and 1125A(g)(3) purposes.

For more detail on how to derive a formula count, determine eligibility, and calculate an initial allocation for charter school LEAs, please see the guidance on within-State allocation procedures at http://www.ed.gov/programs/titleiparta/seaguidanceforadjustingallocations.doc

An SEA would use the respective amount determined in Column 3 to ensure that the 2013–2014 Title I allocation under each formula for a newly opening charter school LEA does not fall below the Column 3 amount.

2. What procedure would an SEA follow if it does not have sufficient funds under one or more of the Title I formulas to meet the hold-harmless level?

If an SEA does not have sufficient funds to meet the hold-harmless level for every LEA (including a newly opening charter school LEA as determined in the example above) under one or more of the Title I formulas, it must ratably reduce each LEA's allocation for that formula down to the amount available to the State.

3. What "prior year" amount does an SEA use to determine how much a newly opening charter school LEA's allocation may be reduced when the SEA reserves funds for ESEA section 1003(a) school improvement purposes?

An SEA uses the total amount in Column 2 in the chart in Question 1 above as a proxy for a newly opening charter school LEA's 2012–2013 aggregate Title I allocation. In reserving funds under ESEA section 1003(a) for school improvement purposes, the SEA may not reduce a newly opening charter school LEA's 2013–2014 aggregate Title I allocation below this amount.

4. How does an SEA determine a "prior year" (SY 2012-2013) base amount under each Title I formula against which to apply the hold-harmless percentage in ESEA sections 1122(c) and 1125A(g)(3) for a significantly expanding charter school LEA?

To determine the "prior year" (SY 2012–2013) base amount for a significantly expanding charter school LEA, an SEA would take the following steps:

- A. Compare the SY 2013–2014 formula count for a significantly expanding charter school LEA with its SY 2012–2013 formula count and calculate the percentage by which its SY 2013–2014 formula count has increased over its SY 2012–2013 formula count.
- B. Increase the SY 2012–2013 allocation the charter school LEA received under each formula by the percentage calculated in Step A to determine the significantly expanding charter school LEA's "prior year" (SY 2012–2013) base amount.

The amount determined in Step B for each formula would be the SY 2012–2013 base amount against which to apply the hold-harmless percentage in ESEA sections 1122(c) and 1125A(g)(3) to calculate the charter school LEA's hold-harmless amount.

The following chart illustrates how this process would work for a significantly expanding charter school LEA:

		SY 2012– 2013 Allocations for Significantly Expanding Charter School LEA	Percentage Increase due to Expanded Enrollment in SY 2013– 2014	(3) Adjustment to SY 2012–2013 Base Amount Due to Increase in the Formula Count (Col. (1) x (2))	(4) Adjusted SY 2012– 2013 Base to Reflect Increase in Formula Count (Col. (1) + (3))*	(5)  Hold- Harmless Percentage (Based on Formula Percentage on Line (11))	(6) Hold Harmless Amount for SY 2013- 2014 Allocation Purposes (Col. (4) x (5))
1	SY 2012–2013 formula count (derived Census count)	277					
2	SY 2012–2013 Basic Grant allocation	\$119,541	52%	\$62,161	\$181,702	90%	\$163,532
3	SY 2012–2013 Concentration Grant allocation	\$23,052	52%	\$11,987	\$35,039	90%	\$31,535
4	SY 2012–2013 Targeted Grant allocation	\$62,938	52%	\$32,728	\$95,666	90%	\$86,099
5	SY 2012–2013 EFIG allocation	\$54,923	52%	\$28,560	\$83,483	90%	\$75,135
6	Total	\$260,454			\$395,890		
7	SY 2013–2014 formula count (derived Census count)	420					
8	Increase over SY 2012–2013 (Line 7-Line1)	143					
9	Percent increase	52%					
10	SY 2013–2014 5 - 17 population	1,432					
11	Formula percentage (Line 7÷Line 10)	29%					

- \* Use this amount as the ESEA section 1003(e) base and the base for calculating the hold-harmless amounts for Basic, Concentration, Targeted & EFIG allocations in the allocation process.
- 5. What "prior year" amount does an SEA use to determine how much a significantly expanding charter school LEA's allocation may be reduced when the SEA reserves funds for ESEA section 1003(a) school improvement purposes?

An SEA uses the total amount in Column 4, line 6 in the chart in Question 4 above as a proxy for a significantly expanding charter school LEA's SY 2012–2013 aggregate Title I allocation. In reserving funds under ESEA section 1003(a) for school improvement purposes, the SEA may not reduce a significantly expanding charter school LEA's SY 2013–2014 aggregate Title I allocation below the amount in Column 4, line 6.

- 6. If an SEA uses estimated data to establish the initial allocation for a newly opening charter school LEA or to establish the extent to which the formula population of a significantly expanding charter school LEA has grown, must it adjust its initial allocations to account for changes resulting from the use of actual data?
  - Yes. If an SEA uses estimated data in either situation, it must adjust its initial allocations to account for changes resulting from the use of actual data. (See 34 C.F.R. § 76.796.)
- 7. Does the process described in Questions 1 and 4 apply to non-charter school LEAs or currently-operating charter school LEAs that are not undergoing a significant expansion?
  - No. The special requirements in ESEA section 5206 apply only to newly opening and significantly expanding charter school LEAs with respect to implementing section 5206 consistent with the operation of the hold-harmless requirements in ESEA sections 1122(c) and 1125A(g)(3) and the special hold-harmless provision in ESEA section 1003(e).

## PARAMOUNT COLLEGIATE ACADEMY

# Petitioners' Response to County Staff Findings

Section 5

## Archived Information

#### NONREGULATORY GUIDANCE

#### ALLOCATIONS TO PUBLIC CHARTER SCHOOLS UNDER TITLE I, PART A OF THE ELEMENTARY AND SECONDARY EDUCATION ACT



# U.S. DEPARTMENT OF EDUCATION Office of Elementary and Secondary Education March 1998

# ALLOCATIONS TO PUBLIC CHARTER SCHOOLS UNDER TITLE I, PART A OF THE ESEA

A growing number of States have enacted legislation establishing public charter schools. Usually, this legislation recognizes charter schools as (1) separate local educational agencies (LEAs) or (2) public schools within an LEA. As such, public charter schools are eligible to receive Federal education funds on the same basis as other LEAs or public schools.

This guidance deals with issues concerning the eligibility of public charter schools to receive funds, and the allocation of funds to such schools, under Part A of Title I of the Elementary and Secondary Education Act. Title I, Part A provides Federal financial assistance, through State educational agencies (SEAs), to LEAs to meet the educational needs of children who are failing or are most at risk of failing to meet a State's challenging content and student performance standards in schools with high concentrations of children from low-income families. Public charter schools may be

eligible to receive Title I, Part A funds, either as LEAs or as participating public schools within an LEA.

In general, when allocating Title I, Part A funds, SEAs and LEAs must treat public charter schools in a manner consistent with the Title I statute and regulations and take all reasonable steps to ensure that public charter schools receive their full allocations. In a State that considers public charter schools to be LEAs, the SEA must treat those public charter schools like other LEAs in the State when determining Title I LEA eligibility and allocations. Similarly, if a State considers public charter schools to be public schools within an LEA, an LEA must treat its public charter schools like other public schools in determining eligibility and within-district allocations. To aid in making these determinations, an SEA or LEA should provide timely information to public charter schools (and potential public charter schools planning to open in an upcoming school year) about Title I, Part A eligibility and allocation procedures so that the public charter schools can provide the necessary data for the SEA or LEA to carry out its Title I responsibilities. Given the fact that new public charter schools often operate under varying time frames with respect to enrolling students, SEAs and LEAs should be appropriately flexible in accommodating this situation. The Department strongly encourages SEAs and LEAs to use the available flexibility to ensure that eligible students in eligible public charter schools receive Title I services in the first year of a public charter school?s operation.

#### **Public Charter School LEAs**

# Q1. What eligibility requirements must a public charter school LEA meet in order to receive Title I, Part A funds?

A. In order to receive Title I funding, a public charter school LEA must meet the same eligibility requirements that apply to other LEAs in the State. To be eligible for a Basic Grant, an LEA must have at least 10 "formula children" and the number of such children must make up more than two percent of the LEA's population ages 5 through 17 years. To be eligible for a Concentration Grant, an LEA generally must have more than 6,500 formula children or the number of such children must exceed 15 percent of the LEA's 5 through 17 population. Formula children are defined in Q. 2.

#### Q2. In general, how does an SEA suballocate Title I funds to eligible LEAs?

A. Using the county Title I allocations provided by the U.S. Department of Education, each SEA suballocates those funds to eligible LEAs, including public charter schools that have been recognized as LEAs by State law, based on their number of formula children. Formula children are children ages 5 through 17 from low-income families and children who live in institutions for neglected children. An SEA must use the best

available data to determine the number of poor formula children and must use the same measure of low-income throughout the State for determining LEA eligibility and allocations. (For more details on how SEAs allocate Title I funds to LEAs, see the Title I regulations in 34 C.F.R. §§ 200.20 - 200.25 and allocation guidance on LEA allocation procedures issued for the appropriate year.)

# Q3. Does an SEA have flexibility in obtaining poverty data for public charter school LEAs?

- **A.** Generally, an SEA must use the same measure of low-income throughout the State for determining LEA eligibility and allocations. Within this general rule, however, an SEA has flexibility in the following areas:
- (1) If enrollment and poverty data for a public charter school LEA are not available at the same time that such data are collected for other LEAs (e.g., the charter school is not yet open), an SEA may use the same data collected at a different time of the year to determine the public charter school's eligibility for and allocation of Title I funds. For example, an SEA that uses enrollment and free and reduced-price lunch (FRPL) data collected in October 1996 to determine LEA allocations for the 1997-98 school year may use public charter school data collected at a later date to determine the public charter school's Title I eligibility and allocation.
- (2) If, when allocating funds to LEAs, an SEA uses census poverty data, for example, that are not available for public charter schools, the SEA may use another poverty measure to estimate the number of census poverty children attending the public charter school and make corresponding adjustments to the census poverty counts of the sending LEAs. For example, an SEA that has FRPL data available for regular and public charter school LEAs may derive a census count for the public charter school LEA by computing the percentage of FRPL children living in each LEA that attend the public charter school and applying that percentage to the census poverty count of each of the sending LEAs. The following examples illustrate how an SEA might use census poverty and FRPL counts to compute an adjusted census poverty count for regular LEAs and the public charter school districts.

#### Example: One public charter school draws students from several LEAs

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Regular LEAs from which			FRPL Children		Census Poverty	Adjuste d	Neglected	Total Formula
PublicCharter		&			Adjustmen	Census	Count	

School Draws Students	Count	Reduced Price Lunch (FRPL) Children Living in Regular LEAs	Living in Regular LEAs & Enrolled in Public Charter School	LEA FRPL Childre n Enrolle d in Public Charter School	t for Regular LEAs Used to Compute Public Charter School Census Count	Poverty Count for Each LEA		Count
LEA 1	14	25	3	12.00%	1.68	12.32	0	12.32
LEA 2	16	29	3	10.34	1.66	14.34	0	14.34
LEA 3	30	58	5	8.62	2.59	27.41	1	28.41
LEA 4	20	40	2	5.00	1.00	19.00	0	19.00
LEA 5	25	50	3	6.00	1.50	23.50	0	23.50
LEA 6	40	79	7	8.86	3.54	36.46	2	38.46
Public Charter School LEA	0	NA	NA	NA	NA	11.97	0	11.97
Total	145	281	23	NA	11.97	145.00	3	148.00

Column (1) Census poverty count for each LEA from which the public charter school draws students.

Column (2) Free and reduced-price lunch (FRPL) counts for each regular LEA from which the public charter school draws FRPL students.

Column (3) FRPL children living in a regular LEA and enrolled in the public charter school.

Column (4) Percent of FRPL children living in regular LEAs enrolled in the public charter school (Column (3) ÷ Column (2))

Column (5) Adjustment to census poverty counts in sending LEAs (Column (1) x Column (4)) used to derive an estimated census count for the public charter school LEA.

Column (6) Adjusted census poverty counts for regular LEAs (Column (1) - Column (5)) plus the derived census count for the public charter school LEA (the total from Column (5)).

Column (7) Count of children in locally operated institutions for neglected children. Column (8) Total formula count for each LEA (Column (6) + Column (7)).

Example: Several public charter schools draw students from one LEA

(1) (2) (3) (4) (5) (6)

Regular						
LEAs from which Public Charter Schools Draw Students	Census Poverty Count	Count of FRPL Children Enrolled in the Regular LEA and Public Charter Schools	Percent of FRPL Children Enrolled in the Regular LEA & Public Charter Schools	Adjusted Census Poverty Count for the Regular LEA and Each Public Charter School	Neglected Count	Total Formula Count
LEA	76,000	199,760	99.88%	75,908.80	927	76,835.80
Public Charter School 1		40	0.02	15.20	0	15.20
Public Charter School 2		120	0.06	45.60	0	45.60
Public Charter School 3		80	0.04	30.40	0	30.40
Total	76,000	200,000	100.00	76,000.00	927	76,927.00

Column (1) Census poverty court for the regular LEA from which the public charter schools draw students.

Column (2) Count of FRPL students enrolled in the regular LEA and the public charter schools.

Column (3) Percent of FRPL students enrolled in the regular LEA and public charter schools.

Column (4) Adjusted census poverty count for the regular LEA and public charter schools (the total for Column (1) (76,000) x individual percentages shown in Column (3)).

Column (5) Count of children in locally operated institutions for neglected children. Column (6) Total formula count for the LEA and each public charter school (Column (4) + Column (5)).

(3) If the same data are not available, an SEA may use poverty data for public charter school children that are from a different source than the data it uses for other LEAs so long as the income level for both sources is generally the same. For example, an SEA uses free and reduced-priced lunch data to allocate Title I funds to LEAs. However, students in a public charter school LEA do not participate in the free and reduced-

price lunch program. Public charter school officials may be able to produce an equivalent count of poor children from families that meet the income criteria for the free and reduced-price lunch program by using other sources of poverty data such as a survey of parents.

# Q4. What if public charter school enrollment and poverty data are not available in time to be factored into the allocation process?

**A.** We encourage SEAs to allow public charter school LEAs as much leeway as possible with respect to deadlines for submitting data. At the same time, because of the need to determine Title I allocations in sufficient time to allow LEAs to design their programs, hire staff, and purchase necessary equipment and materials, an SEA may establish a reasonable cut-off date by which all LEAs (including charter school LEAs) must submit the data necessary for the Title I allocation process.

SEAs should bear in mind that newly opening public charter schools typically are not in a position to identify their formula children until on or near the date when the school actually opens. To accommodate this situation, yet not hold up the determination of final allocations for other LEAs in the State that are not affected by the creation of a charter school LEA, we strongly urge SEAs to use one of the following options:

- (1) An SEA may compute the amount of grants that sending LEAs would have received under sections 1124 and 1124A of Title I had the public charter school LEAs not been created. Under the authority in section 1126(b) of Title I, <sup>1</sup> an SEA may then adjust those allocations for LEAs likely to send children to public charter schools ("sending LEAs") by reserving an estimated amount in anticipation of the start-up of public charter school LEAs. Once poverty data are available based on the actual count of formula children, or to determine an actual count of formula children as provided in the examples in Q. 3, an SEA would determine actual allocations for the sending LEAs and the public charter school LEAs, if eligible, and notify these LEAs of their final allocations for the school year. These final allocations would then be used as the base for determining the hold-harmless allocations the following year.<sup>2</sup>
- (2) An SEA may use funds made available through the reallocation process authorized in section 1126(c) of Title I or from unexpended State administration funds to provide estimated allocations to public charter school LEAs. Once poverty data for the public charter school LEAs become available, an SEA would determine "actual" allocations that the sending LEAs and the public charter school LEAs are entitled to receive and notify the LEAs of what their "actual" allocation would have been for the school year through this process. These "actual" allocations would become the base allocation for determining hold-harmless allocations the following year.

<sup>1</sup>Section 1126(b) allows SEAs to allocate the amounts of grants under Sections 1124 (Basic Grants), 1124A (Concentration Grants), and 1125 (Targeted Grants) among affected LEAs (1) if two or more LEAs serve, in whole or in part, the same geographical area; (2) if an LEA provides free public education for children who reside in the school district of another LEA; or (3) to reflect the merger, creation, or change of boundaries of one or more LEAs.

<sup>2</sup>Generally, the Title I statute contains a "hold-harmless" provision only for Basic Grants whereby an LEA is guaranteed a certain Title I allocation based on its prior year allocation. In the fiscal year 1998 appropriations act, however, Congress established a 100 percent hold-harmless for Basic and Concentration Grant allocations made in school year 1998-99.

#### Public Charter Schools within an LEA

# Q5. What eligibility requirements must a public charter school meet in order to receive Title I. Part A funds from its LEA?

A. In order to receive Title I funds, a public charter school must meet the same eligibility requirements as other public schools in the LEA. To allocate Title I funds to schools, an LEA must first determine which schools (including public charter schools) are eligible to participate. Generally, a school is eligible to participate if the percentage of children from low-income families residing in its school attendance area or enrolled in the school is at least as high as the percentage of children from low-income families in the LEA as a whole or is at least 35 percent.

## Q6. In general, how does an LEA distribute Title I, Part A funds to eligible schools?

A. An LEA ranks all of its schools according to their percentages of poverty and allocates funds to eligible schools, in rank order according to those poverty percentages, based on the number of poor children in each school. In allocating Title I funds, an LEA must serve all schools above 75 percent poverty before serving any school with a poverty rate below 75 percent. After allocating funds to schools above 75 percent poverty, the LEA may serve lower-poverty schools either by continuing with the districtwide ranking or by ranking within grade-span groupings. Although an LEA is not required to allocate the same per-pupil amount to each school in its district, it may not allocate a higher amount per child to schools with lower poverty rates than to schools with higher poverty rates. Depending on choices an LEA makes with regard to such issues as the per-pupil allocation for each school, grade-span groupings, and off-the-top reservations, as well as the amount of Title I funds an LEA

receives, an eligible school may or may not receive Title I funding. (For more details about how LEAs allocate Title I funds to schools, see the Title I regulations in 34 C.F.R. §§ 200.27 and 200.28 and guidance on within-district allocation procedures.)

## Q7. Does an LEA have flexibility in obtaining poverty data for public charter schools?

#### A. Yes, an LEA has flexibility. For example:

- If enrollment and poverty data for a public charter school are not available at the same time that such data are collected for other public schools (e.g., the charter school is not yet open), an LEA may use the same data collected at a different time of the year to determine the public charter school's eligibility for and allocation of Title I funds. For example, an LEA that uses enrollment and free-lunch data collected in February 1997 to determine allocations for the 1997-98 school year may use public charter school data collected at a later date to determine the public charter school's Title I eligibility and allocation.
- If an LEA uses poverty data that are not available for a public charter school, such as free and reduced-price lunch data, the LEA has several options:
  - (1) The LEA may use poverty data for public charter school children that are from a different source than the data it uses for other public schools so long as the income level for both sources is generally the same. For example, public charter school officials may be able to produce an equivalent count of children eligible for free and reduced-price lunches using other sources of poverty data such as a survey of parents, State programs under Title IV of the Social Security Act, or tuition scholarship programs.
  - (2) If complete actual data are not available, the LEA may extrapolate the number of low-income children in a public charter school from actual data on a representative sample of children in the public charter school. The sample size should be large enough to reasonably conclude that the poverty estimate is accurate.
  - (3) The LEA may obtain the number of poor children in a public charter school by correlating sources of data--that is, by determining the proportional relationship between two sources of data on poor children in regular public schools and applying that ratio to a known source of data on poor children in a public charter school.

Q8. What if public charter school enrollment and poverty data are not available in time to be factored into the LEA's allocation process?

- A. We encourage LEAs to allow public charter schools as much leeway as possible with respect to deadlines for submitting data. At the same time, because of an LEA's need to determine the allocation of Title I funds among participating schools in sufficient time to design programs, hire staff, purchase necessary equipment and materials, and consult with private school officials about equitable services for their children, an LEA may establish a reasonable cut-off date by which public charter schools must submit the data necessary for the LEA to make decisions. LEAs, however, should bear in mind that newly opening public charter schools typically are not in a position to identify their poverty children until on or near the date when the school actually opens for the first time. Accordingly, to the extent that an LEA sets a cut-off date for poverty data significantly in advance of such opening, we strongly encourage the LEA to adopt one or more of the following options:
- (1) The LEA may reserve an amount off the top of its Title I allocation that it believes will be sufficient to fund eligible public charter schools. Once a public charter school has the appropriate data, the LEA would determine whether the school is eligible and ranks sufficiently high to receive Title I funds. The LEA would allocate the appropriate amount of the reserved Title I funds to the qualifying public charter school in accordance with the LEA's Title I allocation procedures.
- (2) The LEA may distribute an appropriate amount available from Title I "carryover funds" to a qualifying public charter school.
- (3) The LEA may apply to the SEA for funds available through the Title I reallocation process to serve a qualifying public charter school.

We strongly encourage SEAs and LEAs to take advantage of the flexibility discussed in this guidance in order to ensure that eligible children in public charter schools receive Title I services. -###-

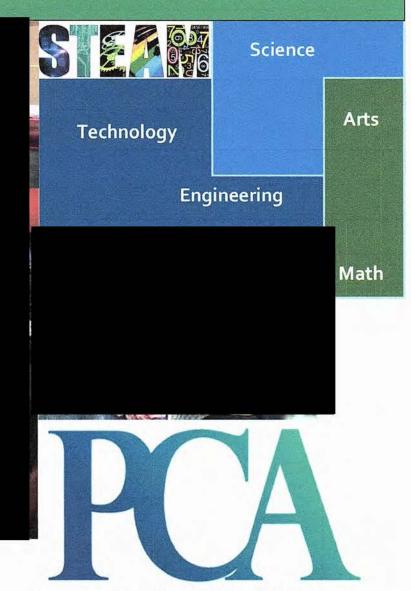
## PARAMOUNT COLLEGIATE ACADEMY

# Petitioners' Response to County Staff Findings

Section 6



Plan for Special Education Services



21st Century Readiness for All Students

# PARAMOUNT COLLEGIATE ACADEMY PLAN FOR SPECIAL EDUCATION SERVICES

#### Vision

Paramount Collegiate Academy (PCA) will enable all students to meet challenging State standards in a college preparatory Science, Technology, Engineering, Arts, and Mathematics (STEAM) program. All students will benefit from small classes. Student-teacher class ratios will remain below 25:1. Small classes will enable teachers to provide personalized instruction and differentiation. Personalized and Differentiated Teaching and Learning will be dictated by course subject, skills taught, assessment feedback, student readiness and student needs. Differentiated techniques will include: a) Flexible arouping-based on interests, learning preferences, or specific learning needs; groups may be selected by teacher, students, or randomly; length of time groups stay together will vary; groupings will be interwoven with whole group instruction and independent work; b) On-going assessment-used by teachers to inform and drive direction and content of instruction; a variety of assessment tools will be used before, during, and after every study unit; c) Risk taking learning environment-students supported in taking learning risks; errors/mistakes will be used for feedback; students will feel safe and connected in a learning community.

Interdisciplinary Teaching will meld Common Core State Standards (CCSS) and Next Generation Science Standards (NGSS) with the Partnership for 21st Century Skills (P21) Framework and P21 Skills Maps. CCSS and NGSS will be integrated with P21's 4-C's-creativity/innovation, critical thinking/problem-solving, and communication/collaboration across the curriculum. Students will master rigorous CCSS/NGSS standards and college preparatory coursework, including Advanced Placement (AP) courses. Curriculum Maps will be developed and continually modified, focusing on students' mastery of CCSS/NGSS and 21st century outcomes. Course maps will be standards-based, with support for rigor provided through AP and ACT College and Career Standards. Maps will include

course themes, CCSS/NGSS standards for content knowledge, skills students will be expected to master, and assessments used to evaluate student mastery levels. 21st Century interdisciplinary themes (global awareness, financial and economic literacy, civic literacy, health literacy, environmental literacy) will be taught through project-based and blended learning. STEAM will be taught via project based and experiential learning, blended learning, and traditional models of instruction. Math and science graduation requirements will exceed University of California (UC) A-G and CCSS/NGSS, based on the STEAM/STEM fields of our global and technologic society. Block Schedule, with general education and special education teachers on interdisciplinary teaching teams, will allow instructors to use daily common planning time to collegially construct and deliver interdisciplinary and STEAM lessons. General education and special education teachers will regularly and collaboratively review student work and achievement data to ascertain needs of students with disabilities for appropriate accommodations and modifications such as extended day tutorials, homogeneous ability groupings, re-teaching, targeted instruction, or use of blended learning technology and software.

Students will explore real-world problems and challenges through Project-Based Learning (PBL), enabling pupils to create, question, and revise knowledge. Learning will be enhanced through the Socratic Method-questioning, reflection, inquiry, and critical thinking. Blended Learning Technology will incorporate a hybrid approach to teaching and learning, using inquiry-based teaching, technology-enhanced instruction, as well as lecture-based and text-based models. This flexible approach will combine online, Internet and digital media, interchangeably with face-to-face instructional practices. Technology will allow teachers to adapt instruction, practice, and assessment for every student. All students will have daily use of an IPad, laptop, Smartphone with laptop dock or tablet with keyboard dock, Rituals and Routines will be taught and reinforced to support blended learning environments. Blended learning will involve elements of student control over time, place, path, and pace, making acceleration and remediation for students with disabilities individualized in terms of length and/or pace of course intervention(s). Particular on-line units of study or targeted content can be developed and assigned to students with disabilities on a case by case basis, targeting specific student needs. Depending on course, content, and student needs, blended learning models such as: Station Rotation, Lab-

PCA Plan for Special Education Services
Draft Board Approved 2.4,15

Rotation, Flipped Classroom, Individual Rotation, Flex, and Self-Blend will be implemented. Interventions within these blended models can be individualized and implemented for students with disabilities such as self-paced units or projects within station rotation, lab-rotation, and individual rotation models.

Rigorous academics will be supported through the Advisory Program. Each pupil will be paired with a school educator, their advisor/mentor throughout their years at PCA. This advisor will mentor and advocate for their students. academically and socially. The advisor will be the important contact and connection between student, family, and school. Contact between advisory teacher and family will be differentiated for students with disabilities based upon student and family needs. Advisory class will meet for a significant amount of time each week for continual academic review and personal goal monitoring. Advisory will have 4 curricular areas of focus: 1) Academic and Professional Literacy-Students will learn vital academic study skills bolstering and supporting learning of CCSS/NGSS as well as competencies that will help students in the workforce. Pupils will learn Cornell-Note Taking as well as organization and planning skills. Advisory mentors will build students' professional literacies by teaching proper resume and email writing, budgeting, saving, credit, and debt; 2) Personal Learning Plans (PLP)-Every student will develop a Personal Learning Plan (PLP) with their Advisory teacher, who will coach the student in initial plan formulation. Students will reflect on their skills, talents, and abilities, as they are guided in developing their PLP. They will think critically about and construct personal, academic, and career goals and pathways to attain the college and career vision of their future. PLP's will be revisited and modified through individual progress monitoring, Advisory mentoring, and periodic PLP meetings between student, Advisor, and family. Students will learn short and long range planning, personal ownership and responsibility for their decisions. Character goals will be reflected upon, using Schoolwide Love & Logic skills and focus curriculum. PLPs, in conjunction with Love & Logic strategies and models, will stretch the student and family to reflect on and develop social and emotional learning goals; 3) Community Service Learning Projects-Each student will craft a project in Advisory class, tied to their academics. Students will probe answers to real world problems by investigating, developing, implementing, and evaluating the effects and sustainability of a community project. Students will learn to serve and give back, bolstering their sense of civic responsibility. Projects will address

human and community needs, enriching student learning experiences. Academic content and skills will be incorporated into projects. Curricular connections will build on students' existing skills. Students will apply math, literacy and problem-solving to real-life situations. Students will personally and actively select, design, implement, and evaluate their projects. Projects will lead to discussions in class and beyond, creating structured situations in which students reflect, think, talk, and write about their projects. 4) Social Wellness: Through Schoolwide Love & Logic, students will learn self-management, positive relationship building, self-awareness, and resilience. Advisory will enhance these skills through teaching healthy personal choices regarding nutrition, exercise, and drugs. Advisory will be a smaller extension of the larger school community, a close-knit, learning community, resembling a "family at school. Love & Logic strategies, methodologies, and paradigms will provide a framework for building and sustaining a culture of strong caring relationships between students and teachers. Each of these Advisory Program components will be differentiated to the specific needs of every student, particularly struggling students and students with disabilities.

Intersession will provide different vital courses, extending PCA coursework and class offerings. The following 4 types of Intersession classes will play an intricate role in the instructional model: 1) Academic Acceleration-Throughout each semester and during Intersession, students identified as struggling (particularly in key subjects of literacy and math), may be placed in intervention courses or after school tutorials to support their learning. Continuous benchmark analysis will inform teachers, faculty, and parents of these needs; 2) Required Graduation Courses-will serve dual purposes by either extending the regular semester, affording PCA the ability to offer additional instructional time for struggling students or students with disabilities to master course skills and content during the regular term and required courses such as art or college readiness, providing additional options and pathways for students to meet graduation requirements; 3) Electives-will provide student opportunities to explore and pursue interests such as robotics, coding, dance, martial arts, or additional art classes; 4) Real World Skills-student opportunities to experience real world travel, internships in the field, or service project work. Students struggling in courses or students with disabilities will also benefit from after school intervention in Teacher Tutorials and Office Hours. These will allow review of key concepts and skills,

answering questions, and further clarifying of instructional material, outcomes, and/or expectations.

### Rationale for SELPA Membership

The success of every student is paramount for PCA. With that in mind, the charter school's Development Team has the desire to partner with an experienced and longstanding Special Education Local Plan Area (SELPA) such as the El Dorado County Charter SELPA. PCA's Development Team understands that the El Dorado County Charter SELPA was the first SELPA of its kind in California, developed specifically for serving charter schools in the state and, as such, has well-developed structures, policies, networks, and resources for its charter school members. For this reason, PCA believes the El Dorado County Charter SELPA's expertise and experience with charter schools will provide the best partnership for Paramount Collegiate Academy, a new charter school and organization. PCA's innovative and relevant education model also necessitates having a special education program that is autonomous and flexible in nature to align with PCA's program, mission, and vision. PCA believes that the EDCOE Charter SELPA is well-aligned with this needed autonomy and flexibility.

Of great significance, PCA believes its Core Values of Innovation, Inspiration, Service, Collaboration, and Lifelong Growth and Learning are well-aligned with the partnership pedagogy of the El Dorado County Charter SELPA. The SELPA's motto of "Empowering Charters to Succeed," further delineates the complimentary relationship that will occur between the El Dorado County Charter SELPA and PCA. PCA believes it will truly be empowered to provide outstanding special education services to its students, as the school grows and builds capacity.

PCA will be located in the County of Sacramento, adjacent to El Dorado County and in close proximity to the EDCOE offices. This will make travel to/from EDCOE, when necessary, reasonable in terms of monetary expenses and time, resources of particular focus during start-up and expansion of PCA.

The Development Team of PCA, including its CEO and Board of Directors, consulted with the Sacramento County Office of Education and special education experts at the California Charter School's Association, to ascertain

the various charter school options for SELPA membership in California. After discussing these options with these outside agencies and professionals, the CEO and Board of PCA decided that the El Dorado County Charter SELPA would be well-suited for PCA, as a new start-up charter school due to its excellent history of serving the particular needs of charter schools. CEO Dawn Contreras Douglas, a thirty year veteran of traditional and charter public education, has served as an Elementary and Middle School Science Teacher, Learning Director, and Curriculum and Instruction, Assistant Principal. During Mrs. Contreras' tenure as a Middle and High School Principal, she became skilled in school improvement and turnaround. Mrs. Contreras has managed and launched charter schools in the Sacramento region for 7 years as Director of State and Federal Categorical Programs and Chief Accountability Officer. PCA's Board Chairman, David Cox, is an attorney specializing in nonprofit and business law. He also has expertise in public policy, having worked in the State Assembly for 6 years. Chairman Cox currently serves as Director of Operations and General Counsel for an international nonprofit. The Vice-Chairman of PCA's Board, Debora Walker, is a parks and recreation administrator with over forty years' experience. She has and continues to serve on several nonprofit boards, serving youth and education programs. Mrs. Walker brings extensive experience in contract negotiations, facilities, budget development, and community outreach. PCA's Board Treasurer, Elaine Mays, is a financial expert with over thirty years' experience as a business owner, accountant, and tax preparer. Mrs. Mays has served as treasurer on several nonprofit boards. Board Secretary, Gail Washington, has over thirty years of experience in banking and lending. The fifth PCA Board Director is Mr. Rob Gerig, a career educator, with over 30 years of service in traditional schools as a Teacher, Coach, Vice-principal, and Director of Student Services for Sacramento City Unified School District. Mr. Gerig launched Sacramento Academic and Vocational Academy Charter School, as Founder and Principal.

El Dorado County Charter SELPA was created specifically for serving charter schools. Hence, the staff members of the SELPA have an in-depth understanding of the unique needs of charter schools. These SELPA staff members will be able to offer invaluable insight and support to PCA, as our LEA develops, sustains, and improves its educational program over time. Additionally, staff from the Charter SELPA partners and PCA can share insights, suggestions, resources, ideas, and

practices in order to maximize student success. Through this partnership network and collaboration, best practices in special education services can be shared within the Charter SELPA and across the state, greatly enhancing PCA's ability to provide outstanding special education services to its students.

Special education is, by nature, highly complex with ever-changing laws, policies, and principles. Through the Charter SELPA's professional development offerings, PCA's staff can learn and keep abreast of the latest best practices, legal policies, and fiscal updates in the field of special education, further enhancing PCA's educational program. A highly informed and well-trained administrative and teaching staff will lead to the best outcomes for PCA students.

Operating as an "LEA" for the purposes of providing special education services and partnering with the Charter SELPA will enable PCA to hire its own staff (general and special education), who will uphold the core values of the Paramount organization and who are aligned with PCA's mission and vision. These employees will be deeply familiar with their PCA students and therefore highly invested in their success and the school's functioning, leading to enhanced and improved student achievement and overall high quality school performance.

In addition to these highly significant networking and professional development opportunities, the Charter SELPA will also greatly enhance PCA's educational program through the special education legal and business office support it provides. This will greatly improve PCA's ability to fund and operate a high quality educational program for every student. Working with the Charter SELPA's special education business support team members, PCA will have access to updated information and procedures for filing all necessary federal and state special education reports.

PCA's charter model has an extremely strong parent involvement component and the Charter SELPA's model is in direct alignment with these policies for creating many parent involvement opportunities. PCA's partnership will allow parents access to the Charter SELPA's parent resources as well as participate in

the Community Advisory Committee. These will keep parents informed, helping make them stronger school partners in the education of their child/children.

Having access to the Charter SELPA's legal experts will assist PCA in keeping updated on the latest special education legal changes. PCA can also utilize the Charter SELPA's legal helpline for consultations, as the cases and/or needs arise. All of these specialized services are provided within the Charter SELPA organization, and as such, will greatly enhance PCA's capacity to provide an outstanding high quality special education program and overall educational program for every student.

PCA will be operating the first STEAM (Science, Technology, Engineering, Arts, and Mathematics) Charter School in the region. Hence, PCA will be offering an innovative alternative for parents, students, and families in Sacramento. Using project-based and blended learning models to deliver an integrated college preparatory STEAM curriculum, PCA will be an innovative educational program. All teachers, general and special education alike, will be organized on interdisciplinary teaching teams and a daily block schedule will provide for collaboration within and among these teaching teams during the normal school day. This interdisciplinary model will enhance the general and special education teachers' ability to plan and deliver collaborative lessons, units, and instruction in the least restrictive environment as well as plan, create, and implement curricular modifications for students with disabilities.

This integrated approach will greatly support the teaching and learning of the new Common Core State Standards (CCSS) and Next Generation Science Standards (NGSS), which espouse teaching in an integrated fashion for greater depth of understanding. PCA will be teaching the Partnership for 21st Century (P21) standards within the CCSS/NGSS so that every student will be learning curriculum that is relevant for this global and technology-driven society.

Every student will have a Personal Learning Plan (PLP) that will teach self-regulation and goal/progress monitoring. These PLPs will further support and enhance IEP goals and strategies for students with disabilities. This program will be implemented in the school's advisory program, where every student will have a school mentor/advisor who will work closely with the student, family, and

teachers, monitoring the student's progress and goal attainment. With every student constructing and monitoring their Personal Learning Plan on a daily basis with their advisory teacher, student needs and interventions can be ascertained and developed rapidly. Intersession courses will provide tailored electives and interventions. The extended school hours for PCA will provide additional instructional time for all students, whereby education will be further individualized through sports, tutorials, and academic assistance.

### Programs, Services, Capacity

PCA will operate autonomously and independently from its authorizer, as a direct funded charter school, operated and managed by Paramount Education Inc., a California Nonprofit Public Benefit Corporation. This relationship will be specified and mutually agreed upon in a Memorandum of Understanding (MOU) with PCA's authorizer which will outline supervisory oversight as required by charter school statute and oversight fees. The MOU will define any alternative terms for dispute resolution between PCA and the authorizer. Paramount's 5 Member Board of Directors includes the Chairman, Vice-Chairman, Secretary, Treasurer, and Director. The Board will oversee all day-to-day operations, finances, expenditures, and hiring and firing of all personnel.

PCA's Chief Executive Officer (CEO) will ensure implementation of Board policies and supervise all operations of Paramount Education Inc., having a keen focus on maximizing student learning. As the Board's Chief Advisor, the CEO will report to the Board, providing leadership and direction to the organization. The CEO will supervise all personnel, human resources systems and services, supervise and evaluate the Director of Fiscal Services, Principal, and Coordinator of Technology.

The Principal, Director of Fiscal Services, Coordinator of Technology, and Resource Specialist will be hired to provide management and leadership at PCA. The Principal will be the instructional leader at PCA, with a primary focus on maximizing student learning for every student. The Principal will work closely with the CEO and Director of Fiscal Services to develop an annual budget and annual school report to the Board. The Director of Fiscal Services will be responsible for all business and fiscal operations. The Coordinator of Technology

will be responsible for supporting and advancing day-to-day technology operations.

The CEO will be responsible for the overall special education program for PCA, ensuring student outcomes and compliance. The school principal will be responsible for oversight and compliance of the school's special education program, under the supervision of the CEO. The Resource Specialist Teacher will manage special education cases at the school site, monitoring all IEP compliance. The Resource Specialist will work with the Principal to oversee development and delivery of all special education services.

Paramount Collegiate Academy recognizes its responsibility to enroll and support students with disabilities who can benefit from its programs and who otherwise qualify for enrollment and pledges to work in cooperation with the Sacramento County Office of Education and El Dorado County Office of Education Charter SELPA to ensure that a free and appropriate education is provided to all students with exceptional needs. Paramount Collegiate Academy will comply with all applicable state and federal laws in serving students with disabilities, including, but not limited to the Individuals with Disabilities Education Improvement Act of 2004 (IDEA), Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, and any other civil rights enforced by the U.S. Department of Education Office of Civil Rights (OCR). Furthermore, PCA will comply with AB 602, SCOE and SELPA guidelines, and all California laws pertaining to special education students.

PCA will be its own local educational agency ("LEA") for the purposes of special education and is applying directly for membership in the El Dorado County Office of Education Charter SELPA in accordance with Education Code Section 47641(a). PCA intends to become a member of the El Dorado County Office of Education (EDCOE) SELPA, has participated in EDCOE's New Member Orientation, and initiated consultation with EDCOE for membership. The Charter School will notify SCOE, the SELPA, and the California Department of Education of their membership acceptance in another SELPA. The Charter School will provide notice of such membership to SCOE at least 30 days prior to the commencement of the initial school year or as otherwise agreed upon with SCOE.

As an LEA, the Charter School will be solely responsible and liable for providing Special Education and related services to students with exceptional needs. The Charter School shall comply with all state and federal laws related to the provision of special education instruction and related services and all SELPA policies and procedures; and shall utilize appropriate SELPA forms.

PCA not only has a superb Founding Board who will be a great asset to the Charter SELPA, but PCA's capacity and ability to develop, implement, and sustain a high quality special education program is also demonstrated by its Development Team, which includes exceptional leader specialists such as Dr. Sharon Tucker, Retired District Superintendent and Senior Program Associate for WestEd and CDE, working with special education and English learner issues statewide, internationally renowned curriculum Professor from UCLA, Dr. John McNeil, Technical Solutions Architect for CISCO Systems, Thomas Montgomery, and Computer Software Designer for The Disney Corporation, Kyle Hayes. PCA's Development Team also includes California League of Middle School's Educator of the Year and Writer of the AIMS Math and Science Projects, Mr. John Wight, Senior Engineering Technician for Fehr & Peers, James Sellards and 13 teachers including a national teacher trainer for Goals 2000, Certified Trainer for Love and Logic, Computer Graphic Designer; two college math experts, Computer Networker, Retirement Specialist at CalPERS, School Counselor, 2 certified special education teachers, and 9 parents with careers as teachers, school administrators, curriculum coaches, art specialists, community/youth programs, and family owned businesses.

#### **Child Find Activities**

PCA understands that all children with disabilities residing in California, including children with disabilities who are homeless, wards of the State, and children with disabilities attending private schools, regardless of the severity of their disabilities,

and who are in need of special education and related services, need identification, location, and evaluation. PCA also understands the need to develop and implement a practical method to determine which children with disabilities are currently receiving needed special education and related services.

With these regulations in mind, PCA will be in continual collaborative contact with the Sacramento County Office of Education's Homeless Liaison, as well as the special education offices of SCOE, all nearby school districts, and all private schools operating in nearby proximity to PCA in order to determine which students with disabilities are currently receiving needed special education and related services. PCA will also make formal requests to each of these education agencies, prior to the start of each school year to gather this needed special education information. Additionally, PCA will include "Child Find" verbiage on its enrollment forms, in order to ascertain special education needs from parents enrolling their children at PCA. These forms will also be translated into Spanish and Russian, major home languages of PCA's potential English learner students.

Upon the commencement of PCA's school year, all students will be evaluated as a means of class placement. No assessment or evaluation will be used for admission purposes. Through collaboration between the faculty and Principal, PCA will work to identify any students, who do not currently have an IEP but may be in need of a pre-referral intervention plan. Principal and faculty will then convene a Student Study Team (SST) for that student. Students possibly in need of special education can be screened from already available data (i.e. school tests, teacher observations, grades, etc.) regarding the student's progress or lack of progress within the general program. For students who are identified as needing interventions, an SST composed of the student, the student's parent or guardian, the Principal, and a PCA faculty member will be responsible for identifying the student's needs and developing a plan to enable that student to be successful, including, but not limited to, an appropriate individual tutoring schedule, classroom modifications, or strategies and techniques to enhance the student's ability to be successful. If the SST finds that the pre-intervention plan is not sufficient to meet the student's needs, they will recommend that student for a formal special education assessment. PCA may also choose to refer a student for services through the provisions of a Section 504 Plan, if appropriate. Parents

will be informed that special education and related services are provided at no cost to them.

#### Accommodations and Modifications to the General Education Program

PCA will comply with the federal mandate of the "least restrictive environment", meaning that the school will make every attempt to educate special education students along with their non-disabled peers. PCA will mainstream all of its students as much as is appropriate, according to each Individual Education Plan (IEP), offering a comprehensive inclusion program that includes specialized individual tutoring through PCA's extended day and year. Each student's IEP requires different kinds of modifications for instruction and services, therefore the educational strategies of the IEP will be built around the student's needs and how these fit within the general educational program of the school. The instruction outlined in each student's IEP will be delivered by personnel qualified to do so. Using interdisciplinary teaming and common block schedule planning periods built within the regular school day, special and general education teachers will have the ability to meet and collaborate to implement appropriate accommodations and modifications to the curriculum. This collaboration will also occur after school and during student non-attendance days.

#### Interventions

PCA will have a network of student support systems in place in order for continual academic and behavioral progress monitoring for every student. PCA will use compiled research and work of the California Dropout Prevention Network (CDPN) performed as a result of SB 65 from the California Department of Education as well as the Annenberg Institute of School Reform Critical Friends Group (CFG) collaboration model and Cycle of Inquiry (COI) student data analysis processes. PCA will also use Dufour's work in the area of Professional Learning Communities (PLC) as a vehicle for establishing a NETWORK OF STUDENT SUPPORT.

PCA believes and will act in a mode that supports, "Prevention Is Prevention" (CDPN, 2001) and will utilize a variety of school structures as well as assessment and evaluation tools to identify students who are academically low

achieving. PCA's interdisciplinary teaming and block schedule will afford teachers and staff the ability to continually meet, review academic profiles of students, confer on student progress, as well as develop pupil interventions. Teachers and staff will have the ability to regularly discuss student progress, assess and identify pupil needs, as well as discuss various modifications, strategies, and interventions for low achieving students and students with disabilities.

Teachers and staff will have the ability to meet informally, as an interdisciplinary team to assess and dialogue regarding student academic concerns and areas of need as well as formally in the form of the Student Success Team Model. PCA will be operating its Advisory program in which all staff will be assigned to mentor and advise a small group of students throughout every student's career at PCA. This model supports the forming of long-lasting supportive relationships between students and adults on campus. This model is highly conducive to prevention in that each student will be closely monitored for behavioral and academic success by their assigned advisor. With this meaningful student-adult mentoring relationship, teachers and staff have the ability to assess and monitor each of their advisory students on a daily and weekly basis. Through advisory, teachers and students will review student progress, both academically and behaviorally, adjusting career goals and plans, and developing action plans that address needs identified cooperatively between the advisor, student, and family. Advisory will also enable close monitoring of IEPs with students, families, and staff.

PCA's NETWORK OF STUDENT SUPPORT, includes: 1) Personalized Learning and Advisory-All students will create personal goals within the advisory program, in conjunction with their advisors and families. These PLPs will also include discussion, review, and inclusion of supports for struggling students, as needed; 2) Differentiated Instruction-All students will receive instruction that is differentiated through various grouping strategies. In addition to differentiating content, through project-based teaching and learning students will also have opportunities to use a variety of modalities and learning styles, as they engage in differentiated content and assessment of that content; 3) Extended School Day-Teachers will conduct Office Hours and Tutorials during Building Block in order to provide student support. These sessions will allow for review of key

concepts and skills, answering questions, and further clarifying of instructional material, outcomes, and/or expectations; 4) Acceleration/Remediation, Intersession or Saturday Academies-PCA will implement additional instructional time for students falling behind, focused on particular accelerative or remedial strategies. These types of interventions will be provided in addition to the extended day tutorials or office hours. PCA will provide these additional interventions during Intersession. Additionally, PCA will explore offering targeted and/or differentiated instruction sessions during Saturday Academies; 5) Data Driven Instruction, Critical Friends, and the Cycle of Inquiry-Using data analysis and review to identify struggling students and students with academic or behavioral needs, PCA will craft and implement interventions that are differentiated and individualized.

Interventions, both academic and behavioral, will be tiered or escalated, based upon individual student need. Tier I Interventions will be the lowest level interventions developed and implemented for struggling students. These will utilize high-quality general education instruction in the core curriculum and may include after school tutorials or office hours, where students receive additional instruction for clarification of concepts, targeted teaching, or additional time to complete assignments and projects. Tier II and Tier III Interventions will be more elaborate, for students with greater intervention needs. Tier II Interventions will provide targeted group instruction or some form of group remediation to improve performance such as particular small group instruction during the regular school day, after school tutorials or intersession courses. Tier III Interventions will involve multiple strategies and more intensive individualized interventions including one-on-one instruction and remediation, assignment to particular assistive technology, specific individualized blended learning laboratory rotation, media, or on-line accelerative programs/software.

#### Special Education Referral Process

The referral process for special education at PCA will involve recognition, prereferral and referral phases. During the recognition phase, an Interdisciplinary Team Meeting will be called with the parent/guardian. Interdisciplinary teachers will provide examples of the student's work and/or anecdotal classroom notes regarding the student's needs. In the meeting, the teachers and parent/guardian will explore whether the issue is a recurrent problem or new. Parents will be best able to present invaluable insight into the knowledge, skills, and needs of their child. The team will document when they recognized an issue. During the meeting, the team will ascertain whether the issue is constant and document any issue that is constant, providing dates and information about the behavior of concern or skill deficit exhibited by the student. The team will investigate whether the issue is appropriate for children of this age and/or behavior is a typical occurrence and should not be confused with an atypical behavior. The parents/guardians will be kept informed of any changes in the student's progress. If, after a period of time, the teacher or team of teachers determines the problem cannot be controlled with simple classroom interventions, then parents/guardians will be notified of a pre-referral Student Study Team.

The pre-referral phase in the special education referral process will be more formal than providing simple and temporary accommodations for students. Prereferral intervention will allow for identification, development, and implementation of alternative education strategies for students who have recognized problems in the classroom before the student is referred to special education. This pre-referral intervention will be conducted by a Student Success Team (also called early intervention team, intervention assistance team, student support team, teacher assistance team, or instructional support team). This Student Success Team (SST) process will be as follows: a) The general education teacher will speak to the SST coordinator (who is an appointment of the principal) about planning an SST. b) The SST time will be scheduled and all who need to attend will be notified by the general education teacher. Participants to consider will include previous and current general education teachers, school psychologist, administrator(s), speech therapist, and/or other intervention specialists. Parents will always be included. c) Parents will be notified on the day of the SST as a reminder, if possible, d) The meeting will then be held and an SST Summary Form will be completed by the team. e) The people responsible for the interventions will be notified by the facilitator designated at the meeting. f) Interventions will be implemented (with oversight from the general education teacher), g) A follow-up meeting will be scheduled and held to discuss whether the interventions showed progress or not, and what the next steps in the intervention process may entail. SST follow up forms will be used. The follow up

can be planned as soon as four weeks after the initial SST. h) If the interventions do not reflect growth, the SST follow up team will list new actions, which may include: further or alternative instructional modifications, groupings, program assignments, or referral for special education testing.

If, after SST interventions in the general education classroom, the student continues to experience difficulty and student performance does not improve, school personnel may refer the child for a special education evaluation. Referrals for determination of eligibility for special education services may be initiated by: a)School personnel (including general education teachers, special education teachers, counselors, administrators, etc.); b)Child's parent(s) or legal guardian(s); or c)Any other person involved in the education or care of the child

The official referral will begin the formal process of determining eligibility for special education services. Once a referral is provided, the school will obtain consent from the parent(s) or legal guardian(s) to begin the evaluation phase of the referral process. PCA will adhere to the 15-day timeline for providing an assessment plan, if appropriate.

The Resource Specialist Teacher of PCA will be responsible for gathering all pertinent student information and sharing such information according to SCOE and/or SELPA policies. Information gathered will be used as tools to determine the student's disability, eligibility for services, and determining the nature and extent of required services.

#### **Assessment Procedures**

Students will be evaluated in all areas related to his/her suspected disability. Assessments will be conducted by a person with knowledge of the student's suspected disability, and administered by trained and knowledgeable personnel and in accordance with any instructions provided by the producer of the assessments. Individually administered tests of intellectual or emotional functioning will be administered by a credentialed school psychologist. Assessments will be selected and administered so as not to be racially, culturally, or sexually discriminatory. Assessments will be delivered in the student's primary language, and a qualified interpreter will be provided if needed. Assessment

tools will be used for purposes for which the assessments or measures are valid and reliable. Assessments will be adapted, as necessary, for students with impaired sensory, physical or speaking skills. A multidisciplinary team will be assembled to assess the student, including a teacher knowledgeable in the disability. Unless conflicting with SCOE or SELPA policies and procedures, PCA will adhere to the following assessment guidelines (if a conflict with SCOE or SELPA policies and procedures exists, then SCOE policies and procedures will govern. Parents or guardians of any student referred for assessment must give their written consent for PCA to administer the assessment. The assessment will be completed and an Individualized Education Program (IEP) meeting will be held within 60 days of receipt of the parent's written consent for assessment.

Types of assessments that may be used for determining eligibility for specialized instruction and services will include, but not be limited to: individual testing, teacher observation, interviews, review of school records, reports, student work samples, and parent input. PCA's multiple measures to assess student academic progress, such as formative assessments in the form of daily student work products and writing samples, as well as school benchmark assessments administered mid-way through each semester may also be used to determine special education eligibility. Teachers and staff will have the ability to construct student academic profiles and diagnose student needs in a continual manner-a preventative approach.

PCA realizes the great need for all forms of measurement and will measure student outcomes and determine special education eligibility through any combination of the following: Performance-based Assessments, Curriculum Embedded Tests and Examinations, Common Evidentiary Models of Cognition and Learning, Authentic Assessments, and Digital Technology. High stakes Smarter Balanced Assessments and all other tests included in the state CAASP will also be used. PCA will contract with Northwest Evaluation Association (NWEA) and education leaders to construct benchmark assessments. PCA's benchmark assessments will be administered midway through each semester, aligned to CCSS and 21st Century P21 descriptors and inform instruction. Summative assessments will also be used and include: All State-Required Assessments (such as SBAC, CAHSEE), End of Semester Examinations, Performance-based Measures. Following PCA's STEAM focus, staff will work to

find ways to compare skills measured with those of students around the globe (such as the Trends in International Mathematics and Science Study-TIMSS).

#### **IEP Development**

All IEP's at PCA will be developed by an IEP team and must include all of the following members: a) The Parent or Guardian of the Student for whom the IEP is developed; b) The Student, if appropriate; c) The Principal; d) At least one Special Education Teacher; d) A General Education Teacher who is familiar with the curriculum appropriate to that student, if the student is, or may be, participating in the general education environment; e) If the child was recently assessed, the individual who conducted the assessment or who is qualified to interpret the assessment results; and f) Others familiar with the student may be invited as needed.

Upon completion of the assessment, the IEP team will be assembled to review the results of the assessment and determine the student's need for special education services. PCA, in coordination with SCOE or the Charter SELPA, will be responsible for scheduling, coordinating and facilitating the IEP meeting. Educators qualified to interpret test results will present the assessment data at the IEP meeting. Parents will be provided with written notice of the IEP meeting, and the meeting will be held at a mutually agreeable time and place.

PCA views the parent as a key stakeholder in these meetings and will make every effort to accommodate parents' schedules and needs so they will be able to participate effectively on the IEP team. The school will provide an interpreter, if necessary, to ensure that all parents and/or guardians understand and can participate in the IEP process. If a parent cannot attend the IEP meeting, the school will ensure his/her participation using other methods, such as conferencing by telephone or meeting at the parent's home.

A copy of the IEP will be given to the parent in accordance with state laws and/or SELPA policies. Upon the parent or guardian's written consent, the IEP will be implemented by PCA, in cooperation with the SELPA in which PCA is a member.

#### **IEP Implementation**

Upon the parent or guardian's written consent, the IEP will be implemented by PCA. The IEP will include all required components and be written on SELPA forms. The student's IEP will include the following: a) A statement of the student's present levels of academic achievement and functional performance; b) The rationale for placement decisions; c) The services the student will receive and the means for delivering those services; d) A description of when services will begin, how often the student will receive them, who will provide them, and where they will be delivered; e) Measurable annual goals and short-term objectives focusing on the student's current level of performance; f) A description of how the student's progress toward meeting the annual goals will be measured and monitored and when reports will be provided; g) Accommodations necessary to measure the academic achievement and functional performance of the pupil on state, county, and district assessments; and h) For students 16 years of age and older, measurable post-secondary goals related to training, education, employment and independent living skills, along with transition services needed to assist the student in reaching those goals.

IEP meetings will be held according to the following schedule: a) Yearly to review the student's progress and make any necessary changes; b) Every three years to review the results of a mandatory comprehensive reevaluation of the student's progress; c) After the student has received a formal assessment or reassessment; d) When a parent or teacher feels that the student has demonstrated significant educational growth or a lack of anticipated progress (consistent with state and federal law, IEP meetings will be held within 30 days of a parent's request); e) When an Individual Transition Plan is (ITP) required at the appropriate age; and f) When PCA seeks to suspend or remove the student for a period of 10 days or more for the same behavior, in order to determine if the student's misconduct was a manifestation of his/her disability.

Every student who is assessed by the school will have an IEP that documents assessment results and eligibility determination for special education services. Paramount Collegiate Academy, in collaboration with SCOE or SELPA, will ensure that all aspects of the IEP and school site implementation are

maintained. PCA will provide modifications and accommodations (outlined within each individual's IEP) in the general education environment taught by the general education teacher. Students at the school who have IEP's will be served in the Least Restrictive Environment (LRE).

#### Specialized Academic Instruction

Specialized Academic Instruction (SAI) will be the primary service provided to students at PCA who qualify for special education. Depending on particular needs of the student, SAI may include one or more of the following: a) Consultation between the resource specialist teacher and general education teacher(s) to assist in providing instructional and assessment adaptations and behavioral interventions, which will allow students with special needs to benefit from their general education classes; b) Monitoring of students by the special education resource teacher through appointments, PLPs, IEPs, weekly progress reports, and/or school-home communication; c)Instructional support provided by the special education resource teacher to help students with special needs progress in their classes by assisting with the understanding of assignments and information being presented, and modifying work to accommodate students' special needs; this instructional support may be provided in a general education class or separate classroom; and d)Collaborative/Team Teaching in which the special education resource teacher and a general education instructor teach a class together that includes both general and special education students.

#### **Designated Instruction and Services**

Eligibility for Designated Instruction and Services (DIS) at PCA will be evaluated through the IEP assessment process or by referral after placement in special education. If the IEP Team determines that DIS services will help a PCA student make progress in the general curriculum, the IEP Team will specify such services, in writing, on the student's IEP.

Examples of DIS services that PCA will provide are: a) Speech and Language Therapy provided by a speech pathologist for children with communication needs; b) Orientation and Mobility Instruction to teach a child with visual

impairments how to navigate through his or her environment; c) Audiological Services for a child with hearing loss; d) Physical or Occupational Therapy for a child with gross motor, fine motor, or self-care needs; e) Vision Services for children with visual impairments; f) Mental Health Services provided by a mental health professional (Clinical Mental Health Therapist); g) Health and Nursing Services provided by a school nurse or other qualified professional for a child with special health care needs; h) Specialized Physical Health Care Services, for example, a child who uses a catheter and needs assistance; i) Extended school year or summer school; j) Transportation to/from school; k) Program Aide or Paraprofessional for a child who needs personal assistance; l) Individual Behavior Training, for example, applied behavior analysis.

PCA will contract with outside service providers (ie. speech therapists, nurses, and psychologists) to provide Designated Instruction and Services (DIS) to special education students who have DIS services delineated on their IEP. PCA may contract with retired nurses from the Twin Rivers Unified School District and/or may include contracting for DIS services through PCA's authorizer, Sacramento County Office of Education. PCA is exploring collaborative DIS contracts with private schools such as nearby Carden School of Sacramento or Town and Country Lutheran School. PCA also has the option of sharing DIS services with other charter schools in the vicinity such as Aspire Alexander Twilight and the California Montessori Project. These private schools and charter schools are in close geographical proximity to PCA's proposed Creekside facility.

#### Specialized Academic Instruction (Greater than 50% of School Day)

If an IEP team determines that a special education student requires more intensive support and Specialized Academic Instruction (SAI) 51% or more of their time in a separate special education classroom, PCA will invest in such an SAI setting in order to offer more intensive pull-out support as well as providing Free and Appropriate Public Education (FAPE) and comparable services to meet student needs as defined and agreed to by the IEP team. The PCA administration, resource specialist teacher, Charter SELPA, teaching staff, and IEP team will work to plan services and provide instruction in the least restrictive environment possible. PCA will provide intensive SAI services on site or accessible through contract with nearby private schools such as Carden School of

Sacramento or Town and Country Lutheran School or through contract with nearby school districts such as Twin Rivers Unified School District, San Juan Unified School District, Center Unified School District, or Sacramento City Unified School District. PCA also has the option of contracting for these SAI services with other nearby charter schools such as Aspire Alexander Twilight or the California Montessori Project. Students who spend the majority of the instructional day in a Separate Class (at a separate site) may also spend a portion of the day in a PCA general education classroom, as determined by the IEP team. This arrangement will be determined by the IEP team and supported, implemented, and monitored by PCA's Resource Specialist Case Manager.

#### Low Incidence Disabilities

PCA's Network of Student Support outlines the array of supports that students will receive when attending the Charter School. This includes small class sizes, which promote more differentiated instruction as well as a resource specialist teacher, who will work closely with the Advisory teacher and regular education teachers to monitor IEPs and student progress. PCA's extended school day will also provide additional academic support to students with Low Incidence Disabilities, tailored to their specific needs. PCA administration, resource specialist, and interdisciplinary teaching staff will work with the Charter SELPA, SCOE, private agencies, CDE, and local school districts to develop, plan, and monitor IEP strategies and supports for students with Low Incidence Disabilities, as needed. The Charter SELPA has access to specific funding pools for low incidence equipment and materials. PCA will utilize these funding pools, if and when necessary. PCA will work to provide the least restrictive environment for low incidence students and contract with outside service providers, as necessary, to provide additional special education services to these students on an individual basis. PCA will ensure that its facility is a barrier-free adaptive environment for students with low incidence disabilities and that its facility is fully compliant with the Americans with Disabilities Act.

#### **Behavioral Supports**

PCA is highly committed to the social and emotional development of every student for success in the 21st century workforce. To that end, PCA will be a Love and Logic school and organization. This entails adopting the Love and

Logic principles, strategies, and positive discipline system school wide. All teachers, staff, and school leaders will receive in-depth staff development training in the skills and strategies of Love and Logic, for full implementation of the Nine Essential Skills for Love and Logic Classrooms. Parents will also be provided Love and Logic information, support, and resources. The primary goals of the Love and Logic Program is to provide educators with practical strategies for reducing behavior problems, increasing student motivation, and building assets that contribute to life-long responsibility and resiliency, all vital for the 21st century world.

Love and Logic is a method of working with students developed by educational expert Jim Fay, child psychiatrist, Foster W. Cline, M.D. and Charles Fay, Ph.D. Love and Logic is supported by a large body of research for each of the nine focus skills taught. Furthermore, there is an increasing amount of research that has been published demonstrating the positive effects of social and emotional learning on academic outcomes in schools. These studies have concluded that intervention programs involving social and emotional learning produced a variety of positive student outcomes including fewer serious discipline problems, school suspensions, better school attendance, higher grade point averages, and higher academic achievement scores in general. These researchers also discovered the development of a "growth mindset" instead of a "fixed mindset", which equates to an internal locus of control versus an external locus of control. People with a growth mindset believe most basic abilities can be developed through dedication and hard work. On the contrary, people who possess a fixed mindset believe basic qualities are fixed traits. A growth mindset develops a love of learning and resilience. Thus, a program that addresses the development of a growth mindset can reduce behavior and discipline issues and therefore help to close the achievement gap.

Not only does PCA hold lifelong growth and learning as a core belief, the Charter School will foster this belief throughout the culture and environment of the school. Love and Logic will promote this type of growth mindset and resilience in its students. The methodologies encourage and develop healthy parent/teacher and teacher/student relationships and positive school wide discipline.

Love and Logic's Program is guided by the following five basic principles, all grounded in research: 1) Preserve and enhance a pupil's self-concept; 2) Teach students how to own and solve the problems they create; 3) Share the control and decision-making with students; 4) Combine consequences with high levels of empathy and warmth; and 5) Build the adult-student relationship.

All staff at PCA will be trained in the Love and Logic Program, providing all staff, students, and families with the in-depth coherence and continuity necessary for any school or home implementation. The essential skills that guide Love and Logic applications in schools will be taught at PCA. These personal, social and emotional skill building methodologies include: 1) Neutralizing Student Anger; 2) Delayed Consequences; 3) Empathy; 4) The Recovery Process; 5) Developing Positive Teacher/Student Relationships; 6) Using Choices to Prevent Power Struggles; 7) Quick and Easy Preventive Interventions and 8) Guiding Students to Own and Solve Their Problems. These Essential Skills will be integrated throughout the curriculum. Classroom teachers, administrators and staff will all be trained in Love and Logic, working together to be role models who reinforce the Love and Logic pedagogy. The school wide discipline policies and classroom management strategies will all be founded on Love and Logic.

Behavioral Supports for special education students at PCA will be planned and developed collaboratively with the IEP team and in conjunction with the school's Love and Logic Program. The IEP Team will construct Behavioral Support Plans, on an individual case by case basis, using Love and Logic principles, strategies, and methodologies.

If additional resources are necessary, PCA administration, resource specialist, and interdisciplinary teaching staff will work with outside agencies such as the Charter SELPA, SCOE, private agencies, CDE, and local school districts to develop, plan, and monitor IEP Behavior Support Plan strategies and methodologies for its special education students needing such services. PCA will contract with outside service providers, as deemed necessary by the school's IEP team, to provide additional behavioral support services to these special education students on a case by case basis.

#### **Transitions Services**

PCA's educational model includes intersession courses and high school internships that have a transition focus, in order to prepare high school students for transition into the workforce and to create transition services for students with IEP's prior to their 15 birthday. During intersession, students will have an opportunity to perform internships, spending time working in the community for local businesses or organizations. Intersession Internships will afford students the opportunity to shadow and work alongside professionals in the field. This will provide pupils with an invaluable opportunity to explore and investigate, firsthand, career interests for their future.

PCA students will participate in 6 weeks of intersession courses two or three times during the school year or they will have the opportunity to enroll in internships operated collaboratively with community organizations or regional businesses. Intersession courses will be connected to other areas of the PCA curriculum and/or other projects the students will be engaged in. Intersession courses will provide students with the opportunity to explore a personal area of interest or passion while they simultaneously gain real world knowledge and experience, frequently from professionals in the field. Intersession courses will also be a component of PCA's Network of Student Support, where students struggling in particular academic areas will receive targeted accelerative intervention.

Intersession will provide different types of vital courses that extend the PCA coursework and class offerings. Intersession will include: targeted and differentiated academic supports, extended instructional time for regular term courses, as well as additional elective offerings defined by PCA students, Board, and faculty. These intersession courses will also be utilized to fulfill students' electives, service learning, internships, college readiness, and other requirements. Intersession will be one of the significant vehicles used to support the seamless school concept, whereby Paramount Collegiate Academy and field professionals are engaged, in the school site and out in the real world community. Elective intersession courses will provide students will the opportunity to explore and pursue interests in elective offerings such as robotics, dance, martial arts, or additional art class.

PCA will also create engaging opportunities for its students during intersession courses through such real world experiences as travel, internships in the field, or service project work. Using and integrating PCA's education model, including Intersession courses, extended day, PLPs, and outside service providers, as needed, the resource specialist teacher and IEP team will plan, draft, and implement transition plans and services for all special education students prior to their 15th birthday

#### **Transportation Services**

PCA administration and school staff will work collaboratively with parents and special education providers to provide transportation for students with special needs to/from special education services located off site. PCA will contract with outside service providers for transportation services, as needed, in order to accommodate students with special needs' access to services not otherwise provided at the PCA school site.

#### Professional Development Plan

PCA holds collaboration and lifelong continuous learning as two of its core beliefs. These are at the foundation of PCA's data-driven project-based instructional model. Additionally, through enacted research-based practices and school turnaround experiences, PCA's Development Team is highly cognizant of the essential elements of high quality professional development. As such, the Charter School is highly dedicated to supporting the continual growth and development of all its educators as a professional learning team. PCA's pedagogy for high quality professional development is supported by the National Education Association (NEA). According to the NEA (2003), "when teachers analyze and discuss instructional practice and the resulting samples of student work, they experience some of the highest caliber professional development available." The elements included herein are considered essential for high quality professional development and will be contemplated and applied in the construction of PCA's professional development activities and trainings. In accordance with these principles, professional development at PCA will be built into the regular school day and be on-going. Professional development collaboration and work among all general and special education staff will occur during common block schedule planning times, intersessions, after school, and on scheduled staff development days.

PCA will also apply the latest body of research regarding inquiry-based teaching methods and project-based learning (PBL) that strongly favor the establishment of supportive networks for teachers' professional development. With this in mind, PCA professional development will be continuous and include growth of and participation in collegial networks as well as trainings such as: School wide Love and Logic training in student behavior management, social and emotional development, with the full application of the Nine Essential Skills for the Love and Logic Classroom; Critical Friends Group (CFG) Model training from the Annenberg Institute of School Reform in the implementation of professional protocols, tools, and strategies for engaging in professional learning community work and collaboration techniques for examining student work, assessment data, and providing skilled peer coaching lesson observations and feedback; Development of classroom and school wide rituals and routines based upon the Love and Logic model; Heidi Hayes Jacob's Curriculum21 Model for creating course curriculum maps; On-going NWEA Assessment Trainings and Development of course benchmark assessments; Rubric Development and Grading Systems; Use of "Marzano's Transforming Classroom Grading" (2000); Cycle of Inquiry (COI); Using the Critical Friends Group (CFG) Model to collectively analyze assessments and multiple data measures; Student Success Team, as well as formulating support systems of intervention; Strategies of support for special populations such as special education and English learner students; Differentiation, content and assessments; Sheltered Instructional Strategies, Specially Designed Academic Instruction in English (SDAIE) and/ Instructional Strategies from: "Classroom Instruction that Works with English Learners" (Hill & Miller, 2013);Instructional Planning Tools and Classroom Tools for Students from, "Teaching 21st Century Skills" (Beers, 2001); Collaboratively analyzing student work products using the CFG Model; Best Practices in Project-Based Learning; and On-going membership and participation in teacher learning networks such as: a) EDCOE SELPA; b) Sacramento County Office of Education; c) The Buck Institute for Education's (BIE) Project-Based Learning Network on Edmodo; d) Edutopia's PBL Discussion Group; e) Project Lead The Way Network; f) New Tech Network; g) Math Network such as CMI or Eureka Math.

The CEO, Principal, regular and special education teaching staff, as well as other appropriate faculty and staff members will attend professional development and/or training meetings necessary to comply with state and federal special education laws, including those sponsored by SCOE or the Charter SELPA. PCA intends to fully utilize professional development opportunities for its teaching and administrative staff facilitated by the Charter SELPA, SCOE, colleges and universities, and private companies or agencies.

## Relationships

PCA will continuously seek out community resources and information through professional organizations that will directly and indirectly support the implementation of special education at PCA. The following is a listing of those agencies: El Dorado County Office of Education Charter SELPA; Sacramento County Office of Education; California Charter Schools Association; Alta California Regional Center; Child Action Inc.; ASPIRE-Alexander Twilight; Charter School Management Corporation; Love & Logic, Inc.; Charter School Development Center; US Department of Justice, Americans with Disabilities Act; Northwest Evaluation Association; WestEd; California Department of Education; National Alliance on Mental Illness; National Charter Schools Association; Sacramento County Sheriff's Community Impact Program; California Children's Services; California Department of Social Services; National Charter School Resource Center: National Alliance for Public Charter Schools; National Association of Charter School Authorizers; Easter Seals Superior California; Muscular Dystrophy Association; National Multiple Sclerosis Society; Central California Hemophilia Foundation; Society for the Blind; WarmLine Family Resource Center; United Cerebral Palsy; American Speech-Language-Hearing Association; Spina Bifida Association of America; California State University, Sacramento; and UC Davis Medical Center.

#### **Special Education Parents**

Ongoing parent/community involvement with special education parents will occur through: 1) Parent Orientation and Handbook: Students and parents will attend an orientation, becoming acquainted with school policies, expectations, values, and norms. Student/Parent Handbook, a resource guide for families will

be distributed during orientation and enrollment. 2) Special education parents will also receive a Special Education Handbook, outlining the Charter SELPA and special education resources available to parents 3) Family Compact: An agreement ensuring the family's commitment to the learning partnership for their student's success. The compact will include a dedication to following the Student/Parent Handbook, homework completion, PLP plans and goals, and punctual school attendance (except for illness). 4) Parent Volunteer Hours: Parents are considered partners and will be expected to participate both within and outside the school. Using parent feedback generated during recruitment and startup, the Board will set policy for minimum number of family volunteer hours each year and provide a list of volunteer opportunities, which address various parent needs. Volunteer information and criteria will be outlined in the Student/Parent Handbook and updated annually based on stakeholder feedback (No child will be excluded due to failure of his/her parent to fulfill participation hours set forth by the Board). 5) Personal Learning Plans (PLPs): Parents will attend PLP meetings with their pupil and Advisor for creating and reviewing academic, college, career, and social-emotional goals (2 required meetings per year will be differentiated based upon student/family needs). 6)

In addition to PLP's, special education students will have their regular IEP's, with implementation, planning, and monitoring through the site resource teacher and advisory teacher. This will also be enhanced through the advisory model and interdisciplinary teams, as teachers will all participate continually in close monitoring of IEP plans, goals, and outcomes. 7) Regular School Communication: Advisors will be first point of contact for parents. Parents will have the ability to inform advisors of any issues at home or concerning the student. Parents will be able to ask questions and monitor student progress. 8) Home Visits: At the option of parents, advisors will conduct home visits at the start of the year or when a student first enrolls; advisors will learn about the family and provide an opportunity to share program information. 9) Student Information System (SIS): A student information system will be implemented, providing parents with web-based access to homework, assignments, school events, and grades. 10) Standards-Based Reporting and Progress Tracking: Through the SIS, parents will have online access to report cards, which will incorporate CCSS/NGSS, as well as all applicable CAASPP measures, multiple measures, and student portfolios; 11) Annual Parent/Community Survey: parents, teachers, staff, and community partners will complete a survey at the end of each year, providing feedback for continuous improvement; 12) Community Advisory Committee: will be created in Year 2 of operations to continue engaging businesses, organizations, and associations in further development/refinement of Intersession, Service Learning Projects, and high school Internships; 13) Parent Advisory Council: will be established by the Board to involve parents in governance such as parent involvement, SELPA involvement and the CAC, volunteer hours/activities, fundraising, and the Parent/Community Survey; The Parent Advisory Council will advise the Board on matters related to strengthening and promoting PCA; administration will meet with council leadership to set and review yearly goals, questions, ideas, or concerns, 14) English Learner Advisory Committee (ELAC): EL parents will be recruited for ELAC, if more than 21 EL students are enrolled (required); 15) Continuing Parent Education: seminars, forums, workshops will inform and equip parents to be school partners; parent training and information may include: curricula, assessments, Love & Logic parenting strategies, LCAP, technology. 16) LCAP: Parents will be involved in all stages of LCAP development, receiving LCAP information via school newsletter, website, workshops, and parent meetings.

#### Parent Participation

PCA will develop a resource packet for distribution to all special education parents upon enrollment at PCA that provides information about the Charter SELPA resources and the SELPA's Community Advisory Committee (CAC). The Advisory teacher will review this resource packet with special education parents upon their child's entry to PCA. During this initial entry conference, the Advisory teacher will encourage parent participation in the Charter SELPA Community Advisory Committee. Special education parents will have the ability to use CAC participation as parent participation hours.

PCA will also appoint a special education parent to the PCA Parent Advisory Council, a body that will work on parent governance issues with the PCA Board of Directors. This special education parent will work in a lead role for special education parents, encouraging attendance at CAC and helping develop ways to assist parent attendance at CAC (such as car-pooling, babysitting,

telephone trees, etc). Attendance at the CAC will be a requisite for this parent appointment. Parents participating in CAC will take on parent leadership roles at the PCA school site. PCA will also support and encourage parent attendance at the CAC through continual information updates provided in school correspondence such as letters, flyers, school newsletter, school website, and bulletin notices.

#### **Charter SELPA Benefits**

One of PCA's core beliefs is collaboration and therefore, the Founding Board and Development Team are highly committed to hiring staff that hold this paradigm. This will greatly benefit the Charter SELPA, since EDCOE SELPA also greatly values partnership, and the formation of relationships to advance best practices and services for students. Another core belief of PCA is innovation. Therefore PCA is dedicated to innovation and will collaborate with the Charter SELPA to bring new improved teaching methodologies and practices to the field of special education. As a charter school with a relevant and innovative education model, Paramount Collegiate Academy will have the ability to share its best practices in the integrated delivery of the CCSS and NGSS, as well as its methodologies for project-based and blended learning with the Charter SELPA and its SELPA partners. The school's STEAM focus will be a fresh and innovative model that PCA can share with the region and across the state with SELPA partners.

As a partner, PCA's Founding Board and Development Team will bring decades of education experience to the Charter SELPA. PCA's team represents 35 highly skilled experts and professionals in teaching, curriculum, school administration, technology, software development, law, accounting, finance, facilities, science, engineering, and math. PCA's CEO and Board of Directors bring a wealth of experience in leadership, finance, governance, and education. The CEO's thirty year career in traditional and charter public education includes over a decade of administrative work as a special education and Section 504 site coordinator. As Principal, the CEO developed special education co-teaching models at the middle school level. During her work as Chief Accountability Officer, CEO Contreras maintained oversight over special education, Section 504, and counseling services for six independent charter schools. Board Director Rob

Gerig served for many years in the Sacramento City Unified School District as the Director of Student Services, overseeing special education and programs and services for at-risk students. Mr. Gerig served as State President of the California Association of Supervisors of Child Welfare and Attendance (CASCWA), an organization of 600 members with expertise in the student services field. During his time as state president, Gerig was awarded the prestigious Lee Lundberg Award, presented annually to the organization's outstanding professional. Mr. Gerig was instrumental in developing a state recognized Truancy Reduction and Dropout Prevention Program for Sacramento City schools, which was largely responsible for decreasing student expulsions in the district by over 75%.

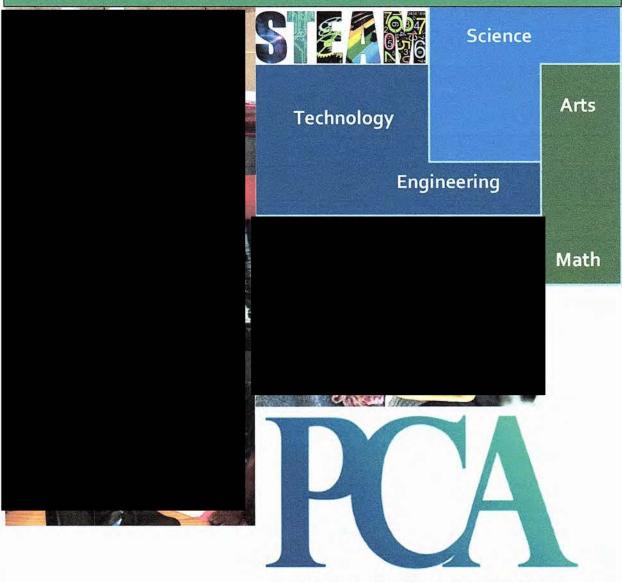
PCA looks forward to a partnership with the Charter SELPA, sharing these areas of expertise with the Charter SELPA and its partners. PCA's certified teacher trainers will be involved in developing and implementing many staff workshops. The team's support services. Technology infrastructure is being drafted and implemented via the team's technology experts.

# PARAMOUNT COLLEGIATE ACADEMY

# Petitioners' Response to County Staff Findings

Section 7

# PARAMOUNT COLLEGIATE ACADEMY Paramount Education Inc. English Learner Instructional Master Plan



21st Century Readiness for All Students

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#### Purpose

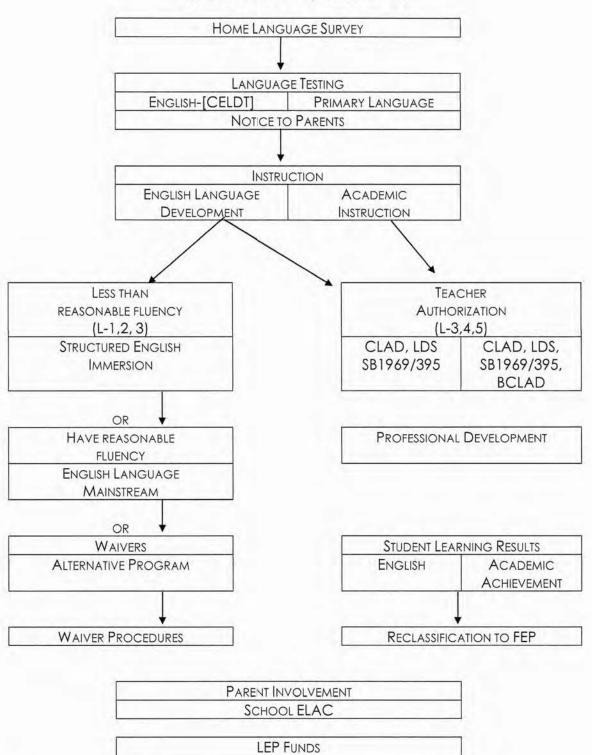
Paramount Education Inc.'s English learner instructional master plan is intended to provide uniform standards for delivering quality and necessary instructional programs and services to all English learners served by Paramount Education Inc.

This instructional plan was developed for the following purposes:

- ensure clarity and consistency throughout all classrooms providing appropriate services to all English learners
- monitor English learner program implementation for uniformity
- provide a guide for creating an optimum and positive learning environment for English learners
- assist and guide teachers and administrators in implementing a rigorous standards-based educational program for all English learners
- provide teachers and administrators with accessible resources and knowledge to use in educating English learners
- fulfill all state and federal requirements for educating English learners

The flow chart on the following page provides an overview of the elements included in this Master Plan for English learners.

# Master Plan for English Learners



#### Core Values

#### We believe in INNOVATION

We are determined to ignite passion and personal motivation in students to succeed at their highest level, as a result of being a significant contribution to a greater good group or team. Student motivation, inspiration, and love for learning will be inspired and cultivated through the engagement of personal interests, student choice, and the fostering of student's gifts and talents. Continual differentiation of teaching and learning through multiple modalities and measures will be utilized through all aspects of the PCA learning model. Students will be personally motivated, inspired, and engaged through the project based curriculum, blended learning, inquiry methodologies, and personal learning plans that are a self-monitoring of student goals, plans, strategies, progress, and outcomes.

#### We believe in SERVICE

Our school will develop student leaders who possess a sense of civic and human responsibility, giving back to the community and others. Students will develop a sense of empathy and positive relationships through the Love and Logic teachings and strategies utilized by all PCA staff and teachers. PCA students will learn to think and act holistically, with the interests of the larger community and/or greater good in mind. Their sense of empathy, compassion, kindness, and humility will be enhanced through the creation and implementation of community service learning projects. These experiential learning opportunities will engage PCA students in the discernment of authentic community needs as well as lead to deep reflective assessment and evaluation of their project's impact on their greater surroundings. Ultimately, PCA students will be active responsible citizens, fully participating in their community and the world around them.

#### We believe in COLLABORATION

We aim to prepare students for a global society and labor force, one in which individual gifts, talents, and abilities are fostered and utilized in a collaborative group effort to achieve common goals. We believe individuals, students, parents, and schools succeed as a collaborative team. Having the ability to communicate and work productively, effectively, and efficiently with others, in the home and workplace, is absolutely critical in the 21st century. Therefore, PCA's learning

environment, teaching strategies, practices, and curriculum will focus on fostering students' abilities to communicate with others in a variety of environments, mediums and contexts, including multiple media and technologies.

#### We believe in lifelong GROWTH AND LEARNING

We realize that learning is a lifelong process. We intend to cultivate an environment centered on a love of learning, growth, and continuous personal and professional improvement for students and staff. PCA's objective is to create an on-going environment that fosters and instills an intrinsic motivation in all students and staff members to become lifelong learners. Ancient societies all over the globe have emphasized the need to learn from cradle to grave. In a society that is rapidly changing, it is imperative that individuals know and understand that learning is an integral part of life, as it has always been, but especially is the 21st century. PCA intends to create the school community paradiam that learning is continuous and that it equates to growth, development, and improvement for all. With this paradigm at the foundation of all PCA instructional practices and educational operations, the Charter School will engage the teaching and practice of gathering information from a variety of sources, as well as utilizing creative and divergent thinking and viewpoints to develop novel solutions. PCA also realizes that reflective practice is at the heart of lifelong learning and continuous improvement.

# **Goals for English Learners**

All schools established, operated, and managed by Paramount Education Inc. will focus on the California Public Schools' goals for pupils learning English as their second language. These state goals are as follows:

- attain English proficiency
- achieve at high levels in the core academic subjects
- meet challenging state academic standards expected of all students

#### **Identification Procedures**

#### INTAKE PROCEDURES

The following enrollment procedures are followed for new students enrolling at any school within Paramount Education Inc.:

- 1. Enrollment papers are completed, including the Home Language Survey.
- For student's whose parents note a language other than English spoken at home, the Informal Primary Language Assessment (California Department of Education) is distributed and completed by the pupil's parent/guardian in their home language.

#### Home Language Survey (HLS)

Schools in California are required, at the time of enrollment, to determine the language(s) spoken in the home by each student in order to provide meaningful and appropriate instruction for all students. All parents are required to complete a Home Language Survey (HLS). When a parent or legal guardian enrolls a student in a new Local Education Agency (LEA) for the <u>first time</u>, the parent must complete the Home Language Survey as part of the LEA's enrollment procedure.

# **English Language Proficiency Assessment**

All students whose Home Language Survey indicates a language other than English must be assessed in English language skills within 30 school days of initial enrollment. A state approved instrument, the California English Language Development Test (CELDT) is currently administered to determine English language proficiency. The CELDT is a criterion-referenced test based on the English Language Development (ELD) Standards. The test assesses a students' proficiency in English listening, speaking, reading, and writing skills.

#### Primary Language Assessment

When a student has been identified as an English learner, through the HLS, primary language proficiency assessment is required in listening, speaking, reading, and writing within 90 calendar days of first enrollment in a California school.

PCA utilizes The Informal Primary Language Survey for this purpose. Numerous language translations are available from the California Department of Education's website. Even though an informal survey or parent interview that addresses listening, speaking, reading, and writing meet legal requirements, it is

highly recommended that English and primary language proficiency of students is ascertained, as this information is critical in planning EL instruction. The more information of primary language capability gathered and made accessible to teachers, the better and more appropriate instruction can be delivered.

#### Student Placement

Upon completion of the assessment process, the school's English Learner Site Designee records the assessment results in the school's computer-based, student information system (SIS). Results of initial assessments are entered for each student and communicated to the child's teacher(s). Each EL student has a permanent cumulative English Learner Folder (purple folder). The following hardcopy records are placed and retained in the English learner folders:

- 1. A copy of the completed Home Language Survey
- 2. CELDT assessment results
- 3. Primary Language Assessment results
- 4. Parent Notification of Program Placement
- 5. Yearly EL Reclassification Review(s)
- 5. Parent Notification of Reclassification (when applicable)

Using information from the CELDT assessment, primary language assessment, and other site academic placement tests, the school principal or his/her designee places the student in the most appropriate instructional setting.

#### Notification of Results of Initial Assessment

Parents whose children speak a language other than English will be notified within 10 days of the completion of their child's initial enrollment.

Upon completion of the assessment process, the school's English Learner Site Designee will send home a letter to each parent/guardian to explain the assessment results, student placement, program options and waiver process. The parent will also receive a Parent Notification Packet.

#### **Transfer Students**

When students transfer between schools, all relevant data regarding the student's English Learner assessment, academic progress, and interventions will be transferred to PCA's Student Information System (SIS). The English Learner Site Designee reviews the information in the student data system to make sure the student is properly placed in his or her new class. Students newly entering PCA will have the relevant assessment, academic progress, and placement information entered into the student data system within ten days of enrollment.

#### Instructional Programs and Services

In accordance with state and federal legal requirements, PCA can offer 4 instructional programs to serve English learners.

The following instructional program options are offered for English learners:

ENGLISH LANGUAGE PROGRAMS	ALTERNATIVE PROGRAMS
Structured English Immersion	Primary language instruction     Program
English Language     Mainstream	Partial Foreign Language     Program

<u>Alternative programs are subject to a minimum enrollment of 20 students per grade level.</u> All instructional programs designed for EL students MUST contain the following components:

- Well-articulated standards-based, differentiated English Language
   Development (ELD) instruction, specifically designed for English Learners;
- Well-articulated standards-based core curriculum instruction provided through SDAIE
- Structured activities designed to develop multicultural competency and positive self-esteem.

#### **Program Descriptions**

#### STRUCTURED ENGLISH IMMERSION PROGRAM

[For EL students at CELDT levels 1, 2, and 3]:

The Structured English Immersion Program is a program described in CA Ed. Code 300-340. It is described as an English language acquisition process for young children in whom nearly all classroom instruction is in English, but the curriculum and presentation are specifically designed for children who are learning the language. Students will be taught subjects "overwhelmingly," but not exclusively, in English. Teachers and instructional aides/paraprofessionals may provide primary language support to assist students in accessing core curriculum. Teachers also use the student's primary language in content instruction to motivate, clarify, direct, support, and explain. The goal of the Structured English Immersion Program is for EL students to develop a reasonable level of proficiency

in English. PCA will use instructional approaches that will allow EL students to acquire English as quickly as possible. Any academic delays will be remediated through interventions such as pull-out or push-in targeted instruction during the school day, as well as before-school, after-school tutorials, intersessions, and summer programs. Access to core content is accomplished through instructional strategies using Specially Designed Academic Instruction (SDAIE) techniques to enable English Learners to gain access to grade level subject matter in mathematics, social studies, science, and other academic subjects required for grade promotion.

#### **Program Elements**

- Parents must be informed of the placement of their children in a Structured English Immersion Program and must be notified of the opportunity to apply for a parental exception waiver for an alternative program or a mainstream classroom. In order to request a waiver, parents must visit the school unless a specific hardship exists.
- Core instruction in math, science, and social science is taught "overwhelmingly" in English with primary language (L<sub>1</sub>) support and SDAIE (Specially Designed Academic Instruction in English) strategies.
- Students at levels 1 and 2 will receive primary language support in language arts, science, and social studies. Students at level 3 receive primary language support at the discretion of the principal.
- All EL students enrolled at site-based schools receive daily ELD instruction based on the board-adopted program and state standards from an appropriately certificated teacher. Instruction must include listening, speaking, reading, and writing.
- All students participate in activities that promote multicultural competency and positive self-esteem.

#### Staffing

- All teachers must be appropriately CCTC certificated, i.e., BCLAD, BCLAD IT, CLAD, CLAD IT, Hughes, Hughes IT (SB1969)
- Bilingual Paraprofessionals/Instructional Aides provide primary language support in the content areas of language arts, science, mathematics, and social studies, under the direct supervision of an EL certified classroom teacher.

#### ENGLISH LANGUAGE MAINSTREAM PROGRAM

[For EL Students at CELDT levels 4-5]:

English Learners who have attained reasonable fluency (ELD level 4-5) and who are not participating in an alternative program are placed in a Traditional/Mainstream Instructional Program. The term 'Mainstream' refers to the fact that these students have an instructional program that is primarily in English. It can also be termed a 'Transitional' program as primary language support in academic areas is provided on a supplemental basis. L1 language arts/literacy instruction can be provided in the student's primary language. Parents of English Learners can request that their student be placed in a mainstream program at any time. The program is designed to continue the development of English, while providing content instruction in English. Specially Designed Academic Instruction in English (SDAIE) is a major feature of this program. Mainstreamed EL students require careful monitoring and attention to ensure their progress toward reclassification.

#### Transitional/Mainstream EL Program is Designed for:

- EL students who are transitioning from SEI to mainstream at ELD levels 4-5
- EL students at any level, whose parents request a mainstream placement
- Long-term EL students, who were never in a program, or who exited a program but do not meet criteria for reclassification

#### Student Grouping

 Students who are at intermediate fluency ELD level 5 who are in mainstream Language Arts courses do not require special grouping. However, consideration must be given to structuring the instruction to target the literacy and other academic needs, specific to the English learner status of these students.

#### **Program Elements**

- All identified English Learners require English Language Development, Mainstreamed EL students participate in ELD classes or Language Arts' classes taught by CLAD (or equivalent) teachers until they are reclassified
- Specially Designed Academic Instruction in English is provided for ELD level 4 students, and others if needed
- Monitoring of progress towards meeting reclassification criteria
- Extended learning and enrichment to "close the achievement gap" and address deficits

# PRIMARY LANGUAGE (BILINGUAL) INSTRUCTIONAL PROGRAM

The Bilingual Program is offered in the student's primary language and English. It is an alternative to Structured English Immersion or English Mainstream Programs in accordance with California Education Code Section 300. The Primary Language Program is a simultaneous approach in which students have intensive English Language Development while at the same time continue mastering the subject matter content in their primary language.

#### Bilingual Program is Designed for:

Any EL student for whom a current waiver is on file, including

- · Students with adequate formal schooling
- Under-schooled students

# **Student Grouping**

When there are 20 participating students of the same language in a school who require a bilingual course, that class must be offered (CA Ed. Code 300).

# **Program Elements**

- a. Systematic English Language Development/High Intensity English (60 minutes/day)
- b. Academic instruction through the primary language (70% in kindergarten and decreasing each year for 6 years to less than 10% in 5<sup>th</sup> grade)
- Sheltered English Instruction increasing each year
   (30% in kindergarten and increasing each year for 6 years to over 90% in 5<sup>th</sup> grade)
- d. Uses board-adopted core curriculum materials provided in the primary language of the student(s)

Alternative programs are subject to a minimum enrollment of 20 students per grade level. Alternative programs will be offered when this number is reached, in accordance with California Education Code Section 300. All instructional programs designed for EL students **MUST** contain the following components:

- Well-articulated standards-based, differentiated English Language
   Development (ELD) instruction, specifically designed for English Learners;
- Well-articulated standards-based core curriculum instruction provided through SDAIE
- Structured activities designed to develop multicultural competency and positive self-esteem.

#### **Instructional Materials:**

PCA uses curriculum that is specified in their charter petition and in turn has been adopted by the Paramount Education Inc. Board of Directors. Materials include print, audio, visual, graphic, and electronic resources.

#### CATCH UP PLAN

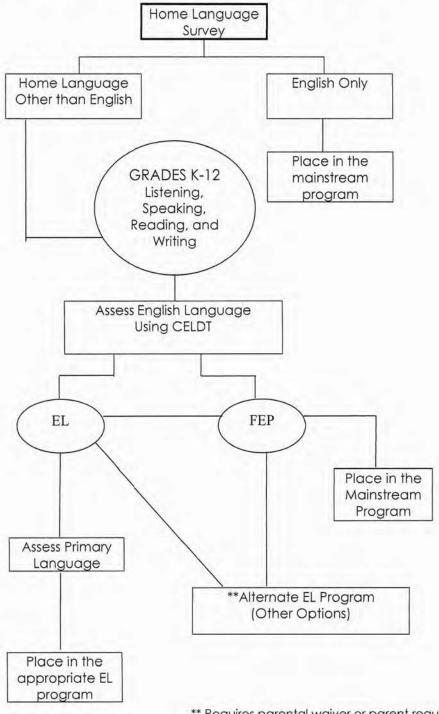
For the sub-group of EL students who have not demonstrated reasonable progress, a catch up plan is implemented. These students are enrolled in special intervention programs such as Response to Intervention (RTI) and their progress is closely monitored by advisory teachers, interdisciplinary teaching teams, site administrator, principal, and Chief Executive Officer. PCA is currently developing this tool to monitor student progress as a function of years in the program. It may also be used to evaluate the EL program by measuring the number of students meeting the expectations for each year in the program.

Paramount Collegiate Academy uses a variety of the following interventions to recoup deficits for English learner students:

#### Possible Interventions for EL Students Not Meeting Targets

- Response to Intervention Model
- Flexible ability groupings with push-in and pull-out
- Additional instructional time including after school tutoring, remedial instruction, before or after school support, Intersession academic support classes, Saturday School, summer school
- Primary Language Support via Bilingual Para Educator or Instructional Aide
- Supplemental Instruction
- Mentoring Support; cross age tutoring
- Concurrent enrollment coursework
- Attending learning center or lab rotation in blended learning labs

# Assessment for Initial Identification and Program Placement



# **Placement of Students**

Paramount Education Inc. uses a number of models to serve students who are Limited English Proficient (LEP), referred to as English Learner (EL). All placements of EL's are based upon the provisions of Proposition 227 (EC 300). Parental involvement in decisions regarding the education of their children is required and critical to the student's academic success. At initial enrollment and every year thereafter, parents are notified of the educational options for their children, including waivers for alternative program(s).

A recommendation for program placement is made in consultation with parents for students assessed to be English Learners with **Less Than Reasonable Fluency** in English. Paramount Education Inc. defines students with Less Than Reasonable Fluency as having a CELDT English score of level 1-3.

Students with Reasonable Fluency in English may be placed in an English language mainstream classroom. Students with **Reasonable Fluency** are identified as having a CELDT English score of level 3-5.

In the English Mainstream Program, the student will receive ELD from the classroom teacher or (at the secondary level) be assigned to a section of ELD until they acquire proficiency in English. The Mainstream Program teacher of EL's provides ELD instruction that continues the students' English language development and prepares them for reclassification. The students must be assisted to recoup any academic deficits, which may have been incurred in the core curriculum as a result of language barriers. SDAIE is an instructional methodology designed to make lessons comprehensible to non-native speakers of English so these students will be able to progress in their studies of Language Arts, Math, Science, and Social Science, and meet grade level standards.

#### Alternative Programs:

Through the California Education Code, parents can request their child be placed in an alternative program through a parental exception waiver. Through this process, parents are advised of their rights to select an alternative program of education for their child. In this program, students are instructed in their primary language and in English while receiving daily ELD instruction. As students move through the grade levels more English instruction is offered and less time is spent in primary language.

# GRADE 6-12 CELDT CUT-SCORES FOR EACH PROFICIENCY LEVEL

(Based Upon California Department of Education, September, 2013)

Grade 6	Listening	Speaking	Reading	Writing	Comprehension	Overall
Beginning	230 - 412	225 - 416	320 - 480	220 - 457	275 - 446	248 - 441
Early Intermediate	413 - 483	417 - 466	481 - 515	458 - 501	447 - 499	442 - 491
Intermediate	484 - 569	467 - 517	516 - 567	502 - 552	500 - 568	492 - 551
Early Advanced	570 - 637	518 - 567	568 - 608	553 - 592	569 - 622	552 - 601
Advanced	638 - 715	568 - 720	609 - 750	593 - 780	623 - 732	602 - 741

Grade 7	Listening	Speaking	Reading	Writing	Comprehension	Overall
Beginning	230 - 417	225 - 422	320 - 484	220 - 461	275 - 450	248 - 446
Early Intermediate	418 - 494	423 - 475	485 - 528	462 - 507	451 - 511	447 - 501
Intermediate	495 - 571	476 - 527	529 - 571	508 - 553	512 - 571	502 - 555
Early Advanced	572 - 648	528 - 580	572 - 612	554 - 599	572 - 630	556 - 609
Advanced	649 - 715	581 - 720	613 - 750	600 - 780	631 - 732	610 - 741

Grade 8	Listening	Speaking	Reading	Writing	Comprehension	Overall
Beginning	230 - 426	225 - 422	320 - 496	220 - 464	275 - 461	248 - 452
Early Intermediate	427 - 507	423 - 479	497 - 542	465 - 510	462 - 524	453 - 509
Intermediate	508 - 594	480 - 538	543 - 587	511 - 556	525 - 590	510 - 568
Early Advanced	595 - 669	539 - 594	588 - 626	557 - 601	591 - 647	569 - 622
Advanced	670 - 715	595 - 720	627 - 750	602 - 780	648 - 732	623 - 741

Grade 9	Listening	Speaking	Reading	Writing	Comprehension	Overall
Beginning	230 - 435	235 - 422	320 - 508	220 - 466	275 - 471	251 - 457
Early Intermediate	436 - 518	423 - 484	509 - 556	467 - 513	472 - 537	458 - 517
Intermediate	519 - 605	485 - 546	557 - 604	514 - 559	538 - 604	518 - 578
Early Advanced	606 - 690	547 - 609	605 - 647	560 - 605	605 - 668	579 - 637
Advanced	691 - 725	610 - 740	648 - 770	606 - 810	669 - 747	638 - 761

Grade 10	Listening	Speaking	Reading	Writing	Comprehension	Overall
Beginning	230 - 444	235 - 422	320 - 520	220 - 469	275 - 482	251 - 463
Early Intermediate	445 - 533	423 - 489	521 - 570	470 - 516	483 - 551	464 - 527
Intermediate	534 - 622	490 - 556	571 - 620	517 - 562	552 - 621	528 - 590
Early Advanced	623 - 711	557 - 623	621 - 664	563 - 609	622 - 687	591 - 651
Advanced	712 - 725	624 - 740	665 - 770	610 - 810	688 - 747	652 - 761

Grade 11	Listening	Speaking	Reading	Writing	Comprehension	Overall
Beginning	230 - 444	235 - 422	320 - 520	220 - 469	275 - 482	251 - 463
Early Intermediate	445 - 533	423 - 489	521 - 570	470 - 516	483 - 551	464 - 527
Intermediate	534 - 622	490 - 556	571 - 620	517 - 562	552 - 621	528 - 590
Early Advanced	623 - 711	557 - 623	621 - 664	563 - 609	622 - 687	591 - 651
Advanced	712 - 725	624 - 740	665 - 770	610 - 810	688 - 747	652 - 761

Grade 12	Listening	Speaking	Reading	Writing	Comprehension	Overall
Beginning	230 - 444	235 - 422	320 - 520	220 - 469	275 - 482	251 - 463
Early Intermediate	445 - 533	423 - 489	521 - 570	470 - 516	483 - 551	464 - 527
Intermediate	534 - 622	490 - 556	571 - 620	517 - 562	552 - 621	528 - 590
Early Advanced	623 - 711	557 - 623	621 - 664	563 - 609	622 - 687	591 - 651
Advanced	712 - 725	624 - 740	665 - 770	610 - 810	688 - 747	652 - 761

# Criteria for Reclassification of English Learners

The four criteria listed below are the essential factors that shall be considered in the reclassification decision for every student as Fluent English Proficient (FEP). Other criteria may be added that would be beneficial for a student's overall assessment. Reclassification of English Learners is outlined in California Education Code sections 313, 60810, 60812 and in California law established by Proposition 227, Education Code sections 300-340.)

#### Criteria:

Assessment of English Language Proficiency using the CELDT Teacher Evaluation
Comparison of Performance in Basic Skills
Parent Opinion and Consultation

#### Assessment of English Language Proficiency:

The CELDT as the primary criterion.

Students will be considered Fluent English Proficient if:

Overall proficiency is Early Advanced (4) or higher AND

Listening and Speaking is Intermediate or higher

Reading is Intermediate or higher

Writing is Intermediate or higher

Those students whose overall proficiency level is in the upper end of Intermediate (3) may also be considered for reclassification if the additional measures determine the likelihood that a student is proficient in English.

#### Teacher Evaluation:

Use student academic performance. Teacher evaluations may be based upon: reading level tests
writing samples
report card grades
grade point averages

\*\*Note: incurred deficits in motivation and academic success unrelated to English language proficiency do not preclude a student from reclassification.

#### Comparison of Performance in Basic Skills:

PCA has determined that students must score at or above Basic on the Smarter Balanced Assessment Consortium (SBAC)-English-Language Arts Test (comparable to Basic on English/Language Arts-California Standards Test (CST) or 70% or higher on a PCA English Benchmark test.

#### Parent Opinion and Consultation

When students meet the other criteria, parents/guardians are provided with a notice of their right and encouraged to participate in the reclassification process. An opportunity for a face-to-face consultation meeting is provided with the notice/letter.

#### Timeliness and Regularity

CELDT is administered in late summer/early fall and results are to be returned to schools in 6-8 weeks. Upon receipt of CELDT data, schools initiate the reclassification process, using the criteria listed above. A school site shall initiate reclassification at any time.

The EL Site Designee reviews all CELDT scores and prepares all English Learner Reclassification Review forms for all EL students. Each site administrator or principal reviews each reclassification candidate and makes the final reclassification determination, based upon the evidence collected for each EL student.

Site EL designees file appropriate forms in the EL student profile folders and send out Parent Notification Letters of EL Reclassification. If the student's scores indicate a fluent English status, the parent/guardian(s) is advised that the child meets all qualifications to move from LEP to FEP. The parent/guardian signs the reclassification form indicating that they wish to reclassify their child to a FEP

status or to remain in the LEP status. If the parent requests a consultation meeting, they are advised to contact their site administrator. The parent reclassification information, letter, and conference are conducted in a language understandable to the parent or guardian.

#### Student Monitoring after Reclassification

Students who have been reclassified as FEP receive follow-up monitoring from site personnel until they have achieved proficient for three years on the STAR CST-ELA test or comparable score on the SBAC-ELA test. The EL Site Designee collects all assessment, teacher information, and reclassification evidence on all LEP students at the school. The principal or principal's designee reviews each LEP reclassification review.

Follow-up support services, as listed in the previous intervention section, are provided for students who do not demonstrate satisfactory progress. These may include, but are not limited to: additional tutoring or counseling, training in test-taking skills, and modified work in reading, language, and mathematics. Site personnel keep documentation and evidence of the student's academic progress on the Student Data System, i.e., intervention screen (AERIES).

#### **Program Evaluation**

Paramount Education Inc. establishes an accountability model for each charter school it establishes, operates, and manages and will hold site administrators accountable for making gains in student achievement each year. Evaluation of instructional programs for English Learners will focus on three goals:

- To develop English and literacy in each EL student as effectively and efficiently as possible.
- To provide EL students equal opportunity for academic achievement through SDAIE (Specially Designed Academic Instruction in English) or SEI (Structured English Immersion) instruction
- To promote a positive self-concept and cross-cultural understanding among all students.

#### **ACCOUNTABILITY CHART**

Personnel	Responsibilities
Classroom Teacher	<ul> <li>Implements specific EL programs as described in this plan and provides instruction that meets state frameworks and standards.</li> <li>Monitors EL students' progress.</li> <li>Ensures delivery of appropriate ELD.</li> </ul>

	<ul> <li>Advocates for support services for students not meeting standards and benchmarks who may be at "risk of retention."</li> </ul>
Instructional Aide	<ul> <li>Provides support in the core subjects (English and/or Primary Language).</li> <li>Assists with student testing.</li> <li>Supports the implementation of the EL Master Plan</li> </ul>
Principal	<ul> <li>Monitors procedures and legal requirements at the school</li> <li>Monitors student placement</li> <li>Monitors implementation of EL Master Plan by classroom teacher.</li> <li>Monitors student records.</li> <li>Organizes school plan for providing appropriate services to EL students.</li> <li>Arranges training: CLAD and other needed staff development to ensure implementation of the EL Master Plan.</li> <li>Prepares school plan for Board Approval</li> <li>Monitors all materials used for evaluation of EL students' progress.</li> <li>Monitors assessments.</li> <li>Recommends student(s) for Reclassification, contacts parents, requests translators</li> <li>Prepares EL Program Evaluation.</li> <li>Shares results of evaluation with all stakeholders including ELAC.</li> </ul>

Chief Executive Officer	<ul> <li>Monitors appropriate credentials of personnel.</li> <li>Monitors progress of staff on plans to obtain authorizations.</li> <li>Monitors base program services for all students</li> <li>Monitors compliance.</li> <li>Arranges training (as needed for compliance): EL administrator training, teacher training, and EL paraprofessional training</li> <li>Monitors EL procedures</li> <li>Evaluates the implementation of PCA goals: implementation of the Master Plan, student achievement, professional development, and school safety.</li> <li>Monitors base program services for all students</li> <li>Monitors compliance.</li> <li>Arranges training (as needed for compliance): EL administrator training, teacher training, and EL paraprofessional training</li> <li>Monitors selection of all materials used in the classroom for delivery of core curriculum to EL students.</li> <li>Evaluates the implementation of district goals: implementation of the EL Master Plan, student achievement, professional development, and school safety.</li> <li>Monitors placement of EL staff</li> </ul>
Parent	<ul> <li>Monitors student's progress: academics, attendance, and behavior.</li> <li>Communicates regularly with teachers and school.</li> <li>Attends parent conferences and school functions.</li> <li>Participates in school committees – ELAC, Site Council, etc.</li> </ul>
Student	<ul> <li>Attends school daily and works for high achievement.</li> <li>Participates fully in school activities.</li> <li>Communicates regularly with parents and teachers.</li> </ul>

#### BENCHMARKS OF ACHIEVEMENT

#### Performance Standards

Performance standards for levels of English language development are described in the Elementary English Language Development Curriculum Guide and the Secondary English Language Development Program. [These are currently being re-evaluated through the California Department of Education, WestEd, and EL experts]. PCA has established benchmarks to determine adequate student progress toward achieving English language proficiency. The timeline below illustrates PCA's projected growth rates for oral English language fluency growth.

6-month – 1 year	+ 6-months 1 year	+ 1-2 year	s =	3-4 years
Beginning Advanced	Early Intermediate	Intermed	Intermediate	

#### **Expected Annual Rates of Achievement**

The goal is to achieve reasonable fluency in the most efficient manner. The expected rate of growth to attain fluency is 5-7 years of ELD instruction. Fluency and Reclassification status are expected in this 5-7 year time span. Expected annual rates of achievement and targeted benchmarks are summarized below:

- 1 year to move from EL 1 to EL 2
- 1 year to move from EL 2 to EL 3
- 1 year to move from EL 3 to EL 4
- 1-2 years to move from EL 4 to EL 5
- 1-2 years of additional support to achieve fluency and attain reclassification status

#### Program Evaluation

There will an annual evaluation report with academic achievement and language development data to measure the effectiveness of services and instructional programs for English Learners. The annual evaluation report will include:

 An assessment of the effective implementation of the Master Plan for English Language Learners pursuant to state and federal guidelines as defined in the Federal Program Monitoring instruments.

- The relative success of PCA in meeting program goals outlined in the Master Plan for English Language Learners.
- Recommendation to increase the effective implementation of the Master Plan and achieve program goals.

# Program Responsibility

Personnel	Responsibility	
CEO	<ul> <li>Evaluates consortium/school data.</li> <li>Meets with principal(s) to review plans, program modifications, and timeline for implementation.</li> <li>Determines curriculum and staff development needs.</li> <li>Monitors program compliance, implementation and effectiveness.</li> <li>Reviews single school district plans.</li> <li>Supports sites in implementing base programs.</li> <li>Oversees data collection, provides analysis, and writes reports.</li> </ul>	
Principal and EL Site Designee	<ul> <li>Assist in data collection and surveys.</li> <li>Review school/classroom data; shares this data with staff.</li> <li>Meet with staff to determine program effectiveness.</li> <li>Identify program models and program modification needed.</li> <li>Inform parents of program results and resources to address student needs.</li> </ul>	
Teacher	<ul> <li>Reviews school/classroom data.</li> <li>Uses data to modify instruction.</li> <li>Reviews standards and assessment process.</li> <li>Determines successful program strategies.</li> <li>Determines alternative strategies for students not meeting standards.</li> <li>Identifies students at "risk" of retention, and informs parents.</li> <li>Inform parents of students' progress and strategies to support students in meeting standards.</li> </ul>	
Parent	<ul> <li>Support students in meeting standards.</li> <li>Supports student in activities to meet standards.</li> <li>Ensures student attendance and completion of homework.</li> </ul>	

#### Staffing and Professional Development

Paramount Education Inc. is committed to recruiting and hiring highly qualified teachers for English Learners. <u>Instructors hired for every teaching position will be fully credentialed to serve English Learners</u>.

# Recruitment and Staffing Efforts

When PCA determines the number of new teaching position estimated to be available during the next school year, job announcements are posted on CCSA, EdJoin, SchoolSpring and/or other Internet educational posting service.

PCA also participates in job fairs and career day activities at colleges and universities, and educational conferences. Jobs are posted on EdJoin, CCSA, and other Internet job sites. PCA also collaborates with Fortune School and student-teacher programs and teacher-interns are welcome participants in PCA's.

#### Hiring

The highest priority of hiring is for: (1) CLAD (or its equivalent) certified teachers (with their subsequent assignment to designated ELD assignments) and (2) hiring teachers who are in the process of obtaining a CLAD (or its equivalent). Teachers who have BCLAD authorization may also be hired and assigned to designated classrooms, as needed.

# Staffing Classrooms

Based on English language proficiency of students, schools will determine instructional needs and appropriately assign teachers to specified programs. All teachers hired by Paramount Education Inc. will hold the proper credentials as outlined by the California Commission on Teacher Credentialing (CCTC) to serve English Learners.

#### **Professional Development**

On a yearly basis an extensive program of workshops is available for administrators, teachers, paraprofessionals, parents, and community members. These workshops are directly related to services for English learners. Examples include:

- Cooperative learning strategies
- Cross-cultural understanding
- ELD
- Structured English Immersion
- Primary Language Instruction/Support

- SDAIE (Specially Designed Academic Instruction In English), TESOL (Teaching English to Speakers of Other Languages), and/or GLAD (Guided Language Acquisition Design)
- Reciprocal Reading
- Building Academic Language
- Curriculum Standards (ELD/Core)
- Preview-Review Strategies
- Classroom Management/Planning of EL Curriculum
- Board-Adopted Programs e.g., Edge, Language!

Site principals provide on-going support and professional development opportunities for personnel who work with English learners to aide in understanding and implementing the ELD strands, integrating the ELD standards with the State content standards in English/Language Arts, and understanding learning theory of EL students.

Additional professional development offerings include, but are not limited to:

- Beginning Teacher Support and Assessment (BTSA)
- Formal and informal in-service programs structured to provide 'Best Practices' and integrated instructional methodologies to teachers
- Literacy Project workshops offered through SCOE, UC Davis, Writing/Math Projects, CTAP.
- Weekly Staff Development and Interdisciplinary meetings
- Summer School Programs & Institutes focusing on English Language Acquisition
- Bilingual Instructional Assistants' training.
- Conference/Workshop attendance
- Teacher mentoring
- School site training with ELAC members
- Demonstration lessons
- SDAIE/Sheltered Instruction
- Vocabulary Development & Academic Language
- Classroom planning
- Cross-cultural understanding
- Structured English Immersion
- Primary language instruction/support
- Preview-review
- ELD standards & curriculum development

Staff development to ensure understanding of all elements of Paramount Education Inc.'s program for English learners is provided to principals and administrators at regularly scheduled meetings throughout the school year. Additional professional development will be offered to administrators in a

coordinated series covering topics such as best practices in ELD classrooms and using ELD standards to evaluate teacher performance.

On a yearly basis, an extensive program of workshops is available for administrators, teachers, and instructional aides as well as community members and parents. These workshops are directly related to services for English Learners.

#### Parental Exception Waivers

#### **Waiver Process**

Per Article 3 of CA Ed. Code 300, English Only instruction may be waived by parent consent. Initially, all parents will receive an orientation to program options for English Learners offered by PCA and the parental exception waiver process. Subsequently, during a conference conducted at the school site, all parents of newly enrolled EL students will be given a full description of the educational materials to be used in the different instructional program choices and all of the educational opportunities available to their child. Parents will be informed of their right to Parental Exception Waivers at that time.

Paramount Education Inc. grants parental exception waivers using the following components:

- Parents and guardians are provided, on enrollment and annually, full
  written and, on request, spoken descriptions of the structured English
  immersion program, alternative programs, all educational opportunities
  available to the pupil, and the educational materials to be used in the
  different options. (5 CCR 11309[b][1])
- Parents and guardians are informed that a pupil under age ten must be placed for not less than 30 calendar days in an English-language classroom the first year of enrollment in a California school. (5 CCR 11309[b][2])
- Parents and guardians are informed of any recommendation by the school principal and are given notice of their right to refuse the recommendation. (5 CCR 11309[b][3])
- Parental exception waivers are acted on within 20 instructional days of submission to the school principal. However, waivers submitted under Education Code Section 311(c) are acted on no later than 10 calendar days after the expiration of the 30-day English-language classroom placement or within 20 instructional days of submission of the waiver, whichever is later. (EC 310, 311; 5 CCR 11309[c])
- Parental exception waivers are granted unless the school principal determines that an alternative program offered at the school would not be

- better suited for the overall educational development of the pupil. (EC 310, 311; 5 CCR 11309[b][4])
- If a waiver is denied, parents and guardians are informed in writing by the principal of the reason for denial and advised that they may appeal to the local board of education or to the court. (EC 310, 311; 5 CCR 11309[d])
- Each school in which 20 or more pupils of a given grade level have been granted a waiver provides such a class. If fewer than 20 waivers are granted, the school provides such a class or allows the pupils to transfer to a public school in which such a class is offered. (EC 310)

# **Types of Waivers**

Section 311 of California Education Code 300 describes the three circumstances in which a Parental Exception Waiver may be granted:

- Children who already know English: The child already possesses good English language skills as measured by standardized tests that measure English Vocabulary, Comprehension, Reading, and Writing such as SBAC, PCA English Benchmarks, or the California High School Exit Exam (CAHSEE), in which the child scores at or above the state average for his/her grade level or at or above the 5th grade average, whichever is lower: or
- Older children: The child is age 10 years or older, and it is the informed belief of the school principal and educational staff that an alternate course of educational study would be better suited to the child's rapid acquisition of basic English language skills; or
- 3. Children with special needs: The child already has been placed for a period of not less than 30 calendar days in an English language classroom and it is subsequently the informed belief of the school principal and educational staff that the child has such special physical, emotional, psychological, or educational needs that an alternate course of educational study would be better suited to the child's overall educational development. A written description of these special needs must be provided and any such decision is to be made subject to the examination and approval of the local school superintendent, under guidelines established by and subject to the review of the Paramount Education Inc. Board of Directors and ultimately the State Board of Education. The parents shall be fully informed of their right to refuse to agree to a waiver

# **Advisory Committees**

Each charter school operated by Paramount Education Inc., shall operate its own English Learner Advisory Committee (ELAC) as a District English Learner Advisory Committee (DLAC).

The following sections outline the roles and responsibilities for single school district ELAC groups:

# English Learners Advisory Committee (ELAC)

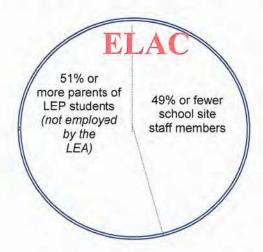
Whenever there are 21 or more identified EL students at a school site, there shall be a functioning English Learner Advisory Committee (ELAC) that has met all of the following:

- 1. Has advised the principal and staff of:
  - a. The development of a site plan for English Learners. This includes the information in the Single School District Plan submitted to the Paramount Education Inc. Board of Directors and the school's EL Staffing Plan.
  - b. Conducting the school's needs assessment.
  - c. The administration of the school's Language Census (R30-LC form).
  - d. The efforts to make parents aware of the importance of regular school attendance.
- 2. Has a membership of EL parents in at least the same percentage as there are EL students at the school.
- 3. Has had an election of members in which all parents of EL students have had an opportunity to vote.
- 4. Has received training materials and training appropriate to assist parent members in carrying out their responsibilities.

The principal or principal's designee will coordinate and conduct ELAC meetings for the single school district.

The following procedures will be used for the formation of the ELAC:

Members of the ELAC will serve for 1 year and will be elected in the fall.
 The ELAC membership composition must be reflected using the illustration below:



#### **ELAC Formation**

The site administrator at school with 21 or more identified EL students will use broad measures to communicate to the school community the need to establish an ELAC.

- A general meeting is called for notifying parents of the school's intention to form an ELAC. All parents are notified of the meeting.
- The role and responsibility of the ELAC is explained
- The principal can entertain nominations or the group can appoint a nominating committee
- All nominees must be informed before nominations and elections to assure they understand the duties, responsibilities, and terms of office.
- Written permission to place names on ballot is obtained that reflecting of required number of EL parents -- depending upon the number of EL students at the site.
- Print ballots in English and other languages appropriate for the school site
- Send ballots to all parents.
- The principal will notify (in writing) those who are elected

#### **ELAC** Composition

- Parent membership percentages on the ELAC shall reflect the language diversity percentages at the school site.
- Parent membership percentages of the ELAC shall reflect the EL percentages at the school site.
- There shall be a minimum of three committee members

#### What is the ELAC?

A committee formed to advise the school on programs for EL students.

Requirement: The site administrator, at schools where there are 21 or more identified EL's, will establish a fully functioning English Learner Advisory Committee.

- The ELAC may be comprised of parents (of EL and non-EL students) and school site staff, where each group (parents, staff) select their representatives, respective.
- Election Procedures
  The site administrator will conduct an election for members of the ELAC in
  which all parents of EL's have an opportunity to vote. The site administrator
  will ensure that the percentage of EL parents in the ELAC is at least the
  same percentage as there are EL students at the school.
- The purpose of the ELAC is to provide opportunities for parents to give advice and assist the school in the decision-making process concerning programs for English Learners. It is the responsibility of the ELAC to keep all parents informed about the schools' EL programs.
- ELAC officers are elected from within the ELAC
   Chairperson (cannot be school personnel)
   Vice Chairperson
   Secretary
   Representative
- The bylaws should be the ground rules for the committee to conduct business. The term "bylaws" refers to a set of rules adopted by the committee to govern its functions. All bylaws should reflect the specific needs of the committee.

The ELAC has five main responsibilities as outlined by the California State Department of Education.

- The ELAC will conduct a school needs assessment for English language learners.
- The ELAC will advise in the development and implementation of the school plan for English Learners submitted to the local board of education.
- 3. The ELAC will review the school's language census (R30) in developing the school's plan for English Learners.
- 4. The ELAC will help make parents aware of the importance of regular school attendance.
- 5. The ELAC can delegate its authority to the SSC every two years if the parents wish to do so.

Parents must be trained in the roles and responsibilities of the ELAC. The site administrator is responsible for keeping all necessary documents verifying an election was held.

#### **FUNDING**

#### **Basic Resources**

The base program is funded through general funds to provide English learner students with learning opportunities in an appropriate program. The provision of such resources is not contingent on the receipt of state or federal categorical aid funds.

Paramount Education Inc. determines base program services and allocates resources to ensure implementation. The base program includes appropriately certified teaching personnel, maintaining a 25/1 student/teacher ratio in grades 6-12, a standards-based curriculum, research-based instructional programs, an assessment plan, and an accountability plan to monitor student progress. Schools receive general funds based on a per student ratio to purchase textbooks, supplies, and support personnel. Schools allocate these funds to implement the base program that includes ELD, SDAIE classes, and a multicultural curriculum.

# Supplemental Resources

- Title III-LEP and Title III-Immigrant funds are used to meet the academic needs of EL students. These funds supplement, but do not supplant, existing resources at the school site.
- 2. Title III-LEP and Title III-Immigrant funds are spent for excess cost services that address the needs of EL students. Expenses can include the following:
  - Resource personnel which can include tutors and bilingual instructional aides
  - b. EL assessment
  - c. Extended learning time
  - d. ELD materials to support the core curriculum which is provided through general fund
  - e. Parent involvement activities
  - f. Translations
  - g. Staff development to address the needs of EL students (for classified and certificated personnel)

- 3. Paramount schools provide appropriate English Language Development resources from local, state, and other funds to support the EL students' academic learning of the core curriculum, to accommodate identified needs, and to provide access to library reference materials.
- 4. Paramount schools complete a needs assessment for support services and English Language Development materials. The School Site Council and school administrator plan a budget that addresses these needs. The Single School District Plan identifies how these funds have been allocated and what activities will be supporting EL students to meet standards.
- 5. The Chief Executive Officer (CEO) reviews the Single School District Plan and makes recommendations to revise the plan or forward the plan to the Board of Directors for approval. The CEO also ensures state legal requirements are followed when using supplementary funds.

#### Resources and Responsibilities

PERSONNEL	RESPONSIBILITY
CEO and Director of Fiscal Services	<ul> <li>Ensures that general funds are allocated to sites and departments to ensure equal access.</li> <li>Prioritizes general funds to support district with needs based on student data.</li> <li>Allocates adequate resources for base program based on student population.</li> <li>Allocates supplementary funds based on formula.</li> <li>Reviews single school district plans for appropriation and compliance.</li> <li>Presents plans to the Board for approval.</li> </ul>
Principal	<ul> <li>Allocates school instructional budget.</li> <li>Develops single school district plan and prioritizes spending based on needs assessment.</li> </ul>
Teachers on Committees SSC/ELAC	<ul> <li>SSC members approve the single school district plan.</li> <li>ELAC members advise on EL section of the plan.</li> </ul>
Parents on Committees SSC/ELAC	<ul> <li>Serve as members and participate in the schools' needs assessment.</li> <li>Give input on single school district plan.</li> <li>SSC members approve the school level plan.</li> <li>ELAC members advise on EL plan.</li> </ul>

#### **Special Education**

All students in need of special education and related services, including students identified as English learner (EL) students will receive appropriate SPED/EL services.

PCA works with other local charter and private schools, the Local Educational Agency (LEA), county office of education, and the Special Education Local Plan Areas (SELPA) to offer sufficient and appropriate resources to ensure each SPED/EL student has the same educational and linguistic opportunities in the least restrictive environment.

SPED/EL program includes the following:

- 1. Initial identification and testing in the primary language and/or English, as applicable.
- 2. The instructional program:
  - a. English language development (ELD).
  - b. Primary language and/or Specially Designed Academic Instruction in English (SDAIE) in the core curriculum based on diagnosed need.
  - c. Implementation of class/course section strategies to promote crosscultural understanding and the development of a positive self-image.
- 3. Qualified teachers (e.g., Bilingual/Cross-cultural Language and Academic Development Certificate (BCLAD/CLAD), SB 1969 or 395, or teachers in CCTC approved intern programs) and support staff will be trained to meet the cultural and linguistic needs of the SPED/EL students.
- 4. Translation of required parent notifications, documents, including IEP—parent rights to inform and involve parents of SPED/EL students, and translation service will be provided.

#### Considering Language Minority Students for Special Education Placement

**Goal:** To more accurately identify language minority students for special education services.

To begin, one must determine whether or not learning disabilities in the primary language exist or if second language acquisition variables, lack of prior school experiences, and/or cultural differences are the reasons for a student's poor achievement in academics.

#### **Screening Methods**

- 1. Evaluate literacy skills in primary language.
- 2. Evaluate language skills and basic knowledge in primary language.
- 3. Evaluate computation skills.
- 4. Correlate English language proficiency level with academic performance as well as with what is expected of the student.
- 5. Review work samples.
- 6. Conduct student and parent interviews.
- 7. Observe student in class in the problem area(s).
- 8. Research CUM.

#### **Procedures**

- 1. Develop EL screening form that teachers are to complete.
- Hold SST (Student Study Team) with teacher, psychologist, counselor, etc. (at least one member of the team must be CLAD or equivalent certified to address second language issues.
- 3. Investigate background information:
  - a. Past grades and comments
  - b. Enrollment and attendance record
  - c. Frequent changes in programs
  - d. Whether transitioned too early
  - e. Receives ELD, Title I, or primary language support
  - f. Social/emotional or behavior issues
- 4. Define second language acquisition stage.
  - a. Compare second language stage with what student is being required to do.
  - b. Review student's performance with respect to his language capabilities.
- 5. List interventions to be implemented for at least six weeks.
  - a. Develop interventions that are linguistically appropriate for student's language level and perceived problems.
- 6. Record date, frequency, and duration of intervention, responsible person for implementation, and resultant effect(s).
- 7. Hold another SST after intervention period is complete.
  - a. Check results of the interventions.
  - b. Check student's work samples.
  - c. Include any information obtained from a screening.
  - d. Decide if evaluation by a psychologist is necessary at this point.
- 8. If a psychological evaluation is deemed necessary, the following instruments and practices are used.

#### **Appropriate Instruments and Practices**

- 1. Woodcock Johnson Battery
- 2. Del Rio
- 3. Brigance
- 4. SPELT II
- 5. Language Sample L<sub>1</sub>
- 6. Articulation Screening L1
- 7. Woodcock Johnson Psycho Educational Battery (R)
- 8. Primary Language Assessment(s)
- 9. Curriculum-Embedded Assessments
- 10. Evaluation Models based on standards and rubrics
- 11. Information acquired through EL screening

Multiple criteria must be used for assessing/identifying students for special education in order to sort out educational needs based on disability from educational needs based on EL status. If alternative procedures are used, it is essential that the evaluators use multiple measures so that lack of English proficiency is not confused for disability. Assessment procedures must be valid. Assessments must be administered by qualified personnel who are also competent in the oral and written skills of the student's primary language and have a knowledge and understanding of the cultural and ethnic background of the student (CA Code of Regulations, Title V, Section 3023.)

The procedures and services for all special education students also apply to SPED/EL students. SELPA and the Individualized Education Plan (IEP) teams should ensure that:

- One member of the team must be CLAD certified.
- IEPs include linguistically appropriate goals and objectives including, when necessary, use of the student's primary language.
- Necessary documentation and translation services are provided to parents, as needed.
- The IEP team will discuss how, when, and by what authorized staff member the student receives a daily program of English language development (ELD).
- Teachers providing SPED/EL students the district's core curriculum, are appropriate certified or in-training
- Alternative reclassification criteria may be utilized on an individual basis. Any
  decision to alter the reclassification criteria must be made by the IEP team in
  accordance with State and Federal requirements.

# PARAMOUNT COLLEGIATE ACADEMY

# Petitioners' Response to County Staff Findings

Section 8

# PARAMOUNT COLLEGIATE ACADEMY PROFESSIONAL DEVELOPMENT PEAN 2015-2017

21st Century Readiness for All Students				
Actions/Activities		eline 5	Position/	
		Ende o	Person(s) Responsible	
<ul> <li>Love &amp; Logic Staff Orientation Training (including Rituals &amp; Routines) 2015/16</li> </ul>	8/15/	School Distric	CEO	
<ul> <li>Love &amp; Logic Staff Orientation Training (including Rituals &amp; Routines) 2016/17</li> </ul>	8/16	ation Findings	CEO	
Cornell-Note Taking Across the Curriculum-Teacher Workshop	10/15	1/16g	Principal	
Teacher Workshop-Develop Portfolio Rubric 2015/16	8/15	9/15 <u>a</u>	Principal	
Teacher Workshop-Revise Portfolio Rubric 2016/17	5/16	8/16	Principal	
<ul> <li>Summative Writing Assessment Teacher Workshop #1-Develop Mid- Year Writing Exam &amp; Scoring Rubric-2015/16</li> </ul>	9/15	11/15	Principal	
<ul> <li>Summative Writing Assessment Teacher Workshop #2-Score Mid- Year Writing Exam-2015/16</li> </ul>	1/16	2/16	Principal	
<ul> <li>Ongoing Workshops &amp; Teacher Lesson Demonstrations such as: PBL, SDAIE, Socratic Method</li> </ul>	10/15	6/17	Principal	
Trainings in Curriculum Implementations such as: Core Knowledge,	10/15	6/17e A	S Principal	

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Professional Development Plan
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Engage		Sacra	
Ongoing Workshops in Developing Flexible Ability Groupings	10/15	6/12hto	Principal
<ul> <li>Ongoing Workshops in Developing Tiered and Interdisciplinary Lessons</li> </ul>	8/15	6/19unty C	Principal
NWEA Training in Use of Formative Assessment Measures 2015/16	10/15	3/1% o	CEO
<ul> <li>Staff Study Book, ie. "Classroom Instruction that Works with English Learners" for 2015/16</li> </ul>	7/15	County Office of Education Findings for 6/1 6/1 6/1 8/1	Principal
<ul> <li>Staff Study Book, ie. "Teaching 21st Century Skills" for 2016/17</li> </ul>	7/16	6/17	Principal
Teacher Training in Curriculum 21 Curriculum Mapping-2015/16	8/15	8/15/fo	Principal
Develop \$1 Curriculum Maps for 2015/16	8/15	8/19nial	Principal
Revise & Refine S1 Curriculum Maps for 2016/17	6/16	7/16	Principal
Develop S2 Curriculum Maps for 2015/16	11/15	12/15	Principal
<ul> <li>Revise &amp; Refine S2 Curriculum Maps for 2016/17</li> </ul>	7/15	8/15	Principal
<ul> <li>Teacher Trainings in Navigation and Use of SIS Software Modules- 2015/16</li> </ul>	7/15	9/15	Coordinator of Technology
<ul> <li>New Staff Trainings in Navigation and Use of SIS Software Modules- 2016/17</li> </ul>	7/16	9/16 Page	Coordinator of

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Profession 2015-2017 Draft

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25: 2015-2017 Draft

NWEA Staff Trainings in MAP Testing & Test Analysis	7/15	915cra	CEO
<ul> <li>Teacher Trainings in Critical Friends Model-Giving Lesson Feedback- 2015/16 &amp; 2016/17</li> </ul>	7/15	2/17nto Co	CEO
<ul> <li>Teacher Trainings in NWEA, Critical Friends &amp; Cycle of Inquiry- Protocols for Data Analysis-2015/16 &amp; 2016/17</li> </ul>	7/15	2/11 Office of Education Findings 2/11 6/11 6/11	CEO
<ul> <li>Teacher Trainings in Critical Friends Model-Protocols for Student Work Reviews-2015/16 &amp; 2016/17</li> </ul>	10/15	2/17 Educ	CEO
<ul> <li>Peer Coaching Teacher Demonstrations 2015/16 &amp; 2016/17</li> </ul>	10/15	3/1797	Principal; CEO
<ul> <li>Join &amp; Participate in Online PBL &amp; NWEA Professional Development Networks</li> </ul>	11/15	6/17ings for	CEO
Teacher Classroom Focus Walk Workshops-2015/16	9/15	1/1 <i>6</i> enia	Principal; CEO
<ul> <li>Teacher Classroom Focus Walk Workshops 2016/17</li> </ul>	9/16	1/17	Principal; CEO
CCSA Board Fiscal Management Training 2015/16	3/15	4/15	CEO
CCSA Board Governance Training 2015/16	3/15	4/15	CEO
CharterSafe Board Workshops in Risk Management 2016/17	7/16	6/17	CEO
<ul> <li>CharterSafe Board Workshops in Human Resources Management 2016/17</li> </ul>	7/16	6/17	CEO
Charter School Management Organization-Business Services-Board	5/15	6/17g	accs-

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& Director, Fiscal Services Training		Sacram	
CCSA On-Site Board Strategic Planning Training-2015/16	8/15	11/120	CEO
CCSA On-Site Board Workshop on LCAP-2015/16	8/15	an Juan Unifie County Office	CEO
		으 후	
		School District and Education Findings	
		for Den	

# PARAMOUNT COLLEGIATE ACADEMY

# Petitioners' Responses to **District Governing Board Action of Denial**

Section 9



21ST CENTURY READINESS FOR ALL STUDENTS

# PARAMOUNT COLLEGIATE ACADEMY

Appeal Packet
Cover Letter & Ancillary Documents

SAGRAMENTO COUNTY OFFICE OF EDUCATION 2014 DEC 17 PM 3: 00

Respectfully submitted to the
Sacramento County Office of Education Board Trustees
December 17, 2014

# PARAMOUNT COLLEGIATE ACADEMY

#### **APPEAL PACKET**

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Section 3.	Certification of Compliance
Section 4.	Description of Petition Changes Reflecting County as Authorizer
	<ul> <li>a. Changes Reflecting County Criteria</li> <li>b. No Noted Deficiencies to Address</li> <li>c. Changes Reflecting Projected Revenues &amp; Expenditures</li> </ul>
Section 5.	Proposition 39 Facility Request
Section 6.	Special Education SELPA
Section 7.	Federal Public Charter School Grant

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Section 8.

# PARAMOUNT COLLEGIATE ACADEMY

#### APPEAL PACKET

Section i

**Introductory Cover Letter** 





December 17, 2014

Mr. Dave Gordon, Superintendent Sacramento County Office of Education 10474 Mather Boulevard Mather, CA 95655

Dear Superintendent Gordon,

The naissance for launching Paramount Collegiate Academy (PCA) began long ago, before our school's development team and board of directors was formed. The beginnings of PCA can be traced to a single-parent family in the 1970's. It was my family, in a tiny very old house. We were poor, with no extra money for clothes, movies, or trips. My mother used her minimum wage earnings on monthly bills to care for me, my infant brother, and my disabled brother with special needs. My neighborhood was just like Arden Arcade. It was full of crime, drugs, and plenty of poverty. I learned resilience, through the dream of a better tomorrow. I believed hard work in school would lead to a better life. My devotion and passion for helping disadvantaged children had its beginnings in those early days of cleaning houses, picking fruit, and scraping to pay bills. I was the first in my family to graduate from college and that would have been impossible, had it not been for scholarships. PCA had its start in places like Arden Arcade, where I have spent 30 years teaching, mentoring, and serving minority children who wore shoes so big, they fell off their feet or whose parents had no money to diaper their babies or whose fathers were addicted to heroin, very impoverished communities.

PCA's origins span years before computers were introduced in classrooms. Paramount's STEAM elements were greatly influenced by my early years teaching science and coaching a regional winning Science Olympiad Team of students who eventually won top honors at the state level. I was wholeheartedly inspired by my team of disadvantaged students, but particularly my 8th grade English learner when he won first place at the state championship in the Paper Airplane Flight, Several months of test flights, adjustments, and data compilations came to fruition for Jose. When the judges placed a gold medal around the neck of this young man, he beamed with a smile so big it lit up the entire auditorium. It was an unforgettable life moment for Jose and for me. Years later, Jose revealed that he embarked on a college career in forensic science because of my science class and our reenacted crime scene investigations. During these years of teaching integrated AIMS-Math and Science and Science Olympiad Events, I realized interdisciplinary teaching and project-based learning had immense impact on learning for every student. I became convinced these methods, created depth necessary for rich academic language development, complexity for critical thinking, and real-world applicability, enhancing student understanding. Over the next two decades, I worked alongside teachers and administrators creating meaningful English learner programs and effective co-teaching models for special education. As a middle school and high school principal, district director, and chief accountability officer, I led successful school turnarounds and developed district improvement systems. This led to state recognition for school improvement through the Governor's Performance Award. These 30 years have been marked by many societal transformations, hastened by technology. Despite these changes, my passion and mission to eliminate the achievement gap in communities like Arden Arcade has remained unaltered.

As Founder and Chief Executive Officer, I am honored and humbled to lead our exceptional team of experts, who have remarkable skills and experience to establish, operate, and sustain a high quality charter school. Our Board and Development Team represent the finest professionals and leaders in teaching, curriculum, school administration, technology, law, finance, science, engineering, and mathematics. We are specialists who have long successful careers working

# San Juan Unified School District and Sacramento County Office of Education Findings for Denial





#### Paramount Collegiate Academy

with school subgroups such as the socioeconomically disadvantaged, English learners, and special needs' students. Our team includes 2 teachers credentialed in Special Education. Joining me on this mission is retired Fairfield-Suisun Superintendent and Senior Program Associate for WestEd, Dr. Sharon Tucker, well-known for helping California school districts address low student performance. Dr. Tucker frequently works with the California Department of Education (CDE) helping districts improve performance for these subgroups. Dr. John McNeil, internationally renowned Education Professor at UCLA and author, is another key team figure. Dr. McNeil's work has taken him around the world, studying school systems and building schools in third world nations. Our team is enhanced by a Technical Solutions Architect for CISCO Systems, Computer Software Designer for The Disney Corporation, Writer of AIMS Math and Science, Senior Engineering Technician for Fehr & Peers, national teacher trainer for Goals 2000, certified Love & Logic trainer, 2 college math experts, and 9 parents with careers as teachers, administrators, curriculum coaches, art specialists, youth program developers, and family business owners.

I serve with a PCA Board that contributes a wealth of experience and dedication in leadership, governance, and education. Our Chairman is a Sacramento attorney, with expertise in public policy as a result of working in the California State Assembly for 6 years. Our Vice-Chairman is a parks and recreation administrator with over 40 years' experience, including years of service on nonprofit boards for youth programs. PCA's Treasurer is a financial expert with over 30 years' experience as a business owner, accountant, and tax preparer. She has served as treasurer on several nonprofit boards. Our Secretary brings a 30-year career in banking and financial lending to our team. Our fifth director is an educator with over 30 years' experience as a teacher, coach, vice-principal, and Director of Student Services for Sacramento City Unified School District. He is knowledgeable in all aspects of student services and special education. He launched Sacramento Academic and Vocational Academy charter school, as founder and principal. PCA's Team of over 35 professionals is devoted, prepared, and ready to serve Arden Arcade.

Arden Arcade is well known in Sacramento. Unfortunately, its recognition doesn't come with a silver lining. The area is plagued by crime, poverty, and failing schools. Within this 18 square mile boundary is one of the highest child abuse and infant death rates in the state, up to 15 times higher than other California communities. (California Department of Public Health, 2014.) In 2014, the Sacramento County Sheriff's Department Community Crime Data reports seven people in Arden Arcade have been shot and killed, 139 have been assaulted with deadly weapons, 35 shootings have occurred inside occupied dwellings, and 146 domestic violence reports have been filed. According to areavibes.com, the estimated crime index for Arden Arcade is 92% higher than the statewide index. The area's estimated violent crime rate is 39% higher than California's average. San Juan Unified School District's (SJUSD) Trustees voted to deny our Charter Petition. Without PCA's high quality college preparatory program, school options and choices for Arden Arcade families remain stark. Failing public schools in Arden Arcade are the norm, rather than the exception. According to the latest California Academic Performance Index for 2012-13, Encina Preparatory High School as well as Dyer-Kelly, Whitney Avenue, Thomas Edison, Howe, and Greer Elementary Schools are all considered the lowest performing schools in the state, with Statewide Decile Rankings of 1. Cottage Elementary's Statewide Decile Ranking of 2, places this school in the same low-performing category. The most recent Suspension and Truancy Rates reported for 2012-13 by CDE add to the community's bleak circumstances. Encina's Suspension Rate was 29.3, more than 5 times the state rate's total of 5.1. Encina's Truancy Rate of 44.6 was nearly double the state's 29.3 rate. Most elementary schools named above had 2012-13 Truancy Rates that exceeded the state rate, including Whitney-38.9, Thomas Edison-32.3, Howe-33.2, and Greer-32.2.





PCA's STEAM model incorporates interdisciplinary, blended and project-based units into a rigorous college preparatory curriculum. Our program is unique, innovative, and relevant to families for the 21st century. Every student will have a digital device, participate in community service projects and receive daily mentoring and tailored intervention through an Advisory Program centered on Personal Learning Plans. PCA's Petition is strong, having been developed by the finest educators and vetted by specialists in charter law, special education, curriculum, instruction, and policy. Our petition meets all requirements of the law and Education Code Section 47605. Consequently, PCA's Petition is being submitted to the Sacramento County Office of Education for authorization on appeal. PCA's Charter Petition Appeal Packet includes the following items required according to ARR 2400:

- Complete PCA Charter Petition as denied by SJUSD Governing Board, with signatures required by Education Code 47605 (5 CCR 11967 (b)(1)).
- Copy of approved SJUSD Board of Education Regular Meeting Minutes of November 18, 2014, in which SJUSD Governing Board took action to deny PCA's Charter Petition
  - b) Copy of letter dated November 25, 2014, noting SJUSD School Board denying PCA's charter petition on November 18, 2014. (Note: Letter includes <u>additional findings not previously shared or discussed with PCA</u> and modified from findings provided to Petitioner(s) on October 28, 2014.)
- 3. Signed Certification of Compliance with Applicable Law (5 CCR 11967(b)(3)).
- Description of changes necessary to reflect the SCOE Board as chartering entity (5 CCR 11967 (b)(4)):
  - a-1) Change in PCA Board Governance Structure, eliminating possibility of Government Code 1090 conflicts of interest
  - a-2) Language changes, where necessary, to reflect Sacramento County Office of Education ("SCOE" or the "County") as authorizer
  - a-3) Change in special education structure to reflect PCA operating as an "LEA" and member of a local charter SELPA
  - b) No noted deficiencies to address in the original petition
  - Budget Narrative, Multiyear Budget Report, and Cash Flow Report changes, reflecting special education modifications mentioned in Item a-3 above
  - Requesting change in start of term to maintain eligibility for the Federal Public Charter School Grant per CDE's letter of October 14, 2014
- 5. Copy of Petitioner(s)' Responses to SJUSD's Review Team Questions 1-57
- 6. Copy of SJUSD letter to Petitioner(s) dated October 28, 2014, explaining SJUSD Review Team Findings and recommendation for denial
- Petitioner(s)' Responses to SJUSD Governing Board's Findings, Denying PCA Charter
- Copy of Proposition 39 Facility Request submitted to SJUSD Superintendent on October 31, 2014
- Copy of Letter formally applying to El Dorado County Charter SELPA, dated December 8, 2014
- Copy of Letter from CDE dated October 14, 2014, noting need to request term change to maintain Federal Public Charter School Grant eligibility
- Copy of Letter from CDE dated October 22, 2014, noting PCA's Federal Public Charter School Grant passed peer review
- 12. Additional Original Community Letters of Support





Superintendent Gordon, let us not look away at the widening gap between rich and poor in our country. The international Organisation for Economic Co-Operation and Development (OECD) released its December 2014 report indicating the continued rise of income inequality around the world. This is particularly true in the United States. Our country has the second highest income inequality increases in the world. The OECD points to a lack of investment in education as the key factor behind this rising income gap. Arden Arcade, like many communities across our nation, is in desperate need of investment in education. Parents and community members across Arden Arcade stand alongside PCA's Development Team, ready and eager to make a difference, to build and invest in our new charter school. Our Federal Public Charter School Grant of \$575,000 awaits the county's authorization. We are eager to collaborate with SCOE to launch Paramount Collegiate Academy as the 21st Century STEAM School for Arden Arcade. Join us in confronting these issues of achievement and economic disparity. The neighborhoods of Arden Arcade need restoration. The families of Arden Arcade need rejuvenation. The children of Arden Arcade need hope.

Sincerely,

Dawn Contreras Douglas

Founder & CEO

Paramount Collegiate Academy

Paramount Education Inc.









**OUR SUPPORTERS:** 

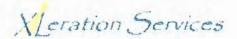
Rotary Club of Arden Arcade







Advanced Tax & Accounting Firm







California Charter Schools Association



TRODFIRE INC.

Daniels & Company, Inc.
Certified Public Accountants

North Area Dental Laboratory









Cot

Cottage Park/Creekside Neighborhood Association

Material Damage

**Appraisal** 











# PARAMOUNT COLLEGIATE ACADEMY

# APPEAL PACKET

Section 1

**PCA Charter Petition** 



Please refer to the attached **Paramount Collegiate Academy Charter Petition** and Charter Appendices Binders which include:

- A. The complete copy of the charter petition as denied by San Juan Unified School District's Governing Board on November 18, 2014
  - Original petition deletions to reflect County Authorization are Redlined.
  - Original petition additions to reflect County Authorization are in Purple.
- B. Signatures required by Education Code 47605 (5 CCR 11967 (b)(1))

<u>Teacher Signatures</u>: PCA has met the charter petition requirements outlined in Education Code 47605 (a) (1) (B) with the signatures of nine California credentialed teachers who have expressed meaningful interest in teaching at PCA. Please refer to Charter Appendix B.

<u>Parent Signatures</u>: PCA has collected petition signatures from parents indicating they are meaningfully interested in enrolling their children at PCA. While we have collected nine teacher signatures in Charter Appendix B to meet the petition requirement of Education Code 47605 (a) (1) (B) for this Charter petition, we have also collected and included 244 parent signatures in *Charter Appendix C* (of which 186 parents have children eligible to attend PCA in Fall 2015).

# PARAMOUNT COLLEGIATE ACADEMY

#### APPEAL PACKET

Section 2

Governing Board Action of Denial & Written Factual Findings



Enclosed herein Section 2 are the following documents, as required by Education Code 47605(b) and 5 CCR 11967(b)(2):

- A. Copy of approved San Juan Unified School District (SJUSD) Board of Education Minutes from its Regular Meeting held November 18, 2014, in which the SJUSD Governing Board took action to deny the Paramount Collegiate Academy Charter Petition
- B. Copy of letter from SJUSD, dated and hand delivered to Petitioner(s) on November 25, 2014, which state on page 1, "summarize the findings of the San Juan Unified School District's Board of Education denying the Paramount Collegiate Academy ("PCA") Charter Petition"
- C. Copy of letter from SJUSD dated and emailed to Petitioner(s) on October 28, 2014, which note on page 1, the letter explains the SJUSD Charter Review Team Findings
- D. Copy of Petitioner(s') Responses to SJUSD Governing Board's Findings, Denying the Paramount Collegiate Academy Charter Petition.
- E. Copy of Letter dated September 22, 2014 from Petitioner(s) to Linda Bessire, SJUSD Director, Pupil Personnel Services, responding to SJUSD District Review Team Petition Questions 1-20.
- F. Copy of Letter dated September 25, 2014 from Petitioner(s) to Linda Bessire, SJUSD Director, Pupil Personnel Services, responding to SJUSD District Review Team Petition Questions 21-41.
- G. Copy of Letter dated September 24, 2014 from Petitioner(s) to Linda Bessire, SJUSD Director, Pupil Personnel Services, responding to SJUSD District Review Team Petition Questions 42-55.
- H. Copy of Letter dated October 10, 2014 from Petitioner(s) to Linda Bessire, SJUSD Director, Pupil Personnel Services, responding to SJUSD District Review Team Petition Questions 56-57.





September 22, 2014

Linda Bessire, Director, Pupil Personnel Services San Juan Unified School District 3738 Walnut Avenue Carmichael, CA 95608

Dear Dr. Bessire,

The PCA Board appreciates the thoroughness with which your District Review Team is taking with our Charter Petition. We realize the substantial size of the document and how that impacts the review process. Hopefully the following responses to your team's questions of September 12, 2014, clarify petition details and move us one step closer to the Board of Trustee's authorization vote. Question Set 1-20 posed by your review team and their accompanying responses are provided herein as follows:

- 1) "In reviewing the student outcomes they are not found to be measurable. The goals are not student-directed or written for student performance rates. Will you clarify?" Response: Pupil outcomes are listed on pages 121-128, which align with the state priorities of the new Local Control Accountability Plan (LCAP) requirements, as described in Education Code Section 52060 (d), which apply for the grade levels served and the nature of the program operated by PCA. In particular, student achievement and performance goals are outlined on pages 125 and 127, describing the measurable Schoolwide and subgroup outcome goals as defined in the newly adopted Assembly Bill (AB) 484, Education Code 52060 (d) and Education Code Section 47607. The LCAP developed by PCA in its first year of operation shall further delineate measurable subgroup goals such as "All Groups", "African-Am", or "Eng Learner" as outlined in San Juan Unified School District's 2014/15 LCAP approved on June 24, 2014. PCA shall develop and approve its annual LCAP by the Board of PCA, following all specified requirements of Education Code Sections 52060 - 52077. The LCAP is not part of this Charter, and therefore, annual amendments to the LCAP such as forming or revising schoolwide and/or subgroup goals per Education Code 47607 (a)(3)(B), shall not be considered a "material revision to the charter" as defined in Education Code Section 47607.
- 2) "How will multiple measures be selected and will they be consistent from year to year (pages 129-137)" <u>Response</u>: CAASPP and all state required measures will be consistent with all state requirements. AP exams will be consistent year to year. All other measures listed on pages 129-137 such as standardized benchmarks,

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summative assessments, writing assessments, diagnostic tests, digital portfolios, service projects, and report cards will be consistent from year to year, with annual revisions and updates completed through an outside vendor (ie. Northwest Evaluation Association-NWEA) or teacher teams. Selection of other multiple measures will be based upon student and group needs.

- 3) "How will the scoring for these assessments be done" <u>Response</u>: PCA's assessments will be scored through a variety of methods including computer scoring through state-contracted vendors (ie CAASPP), outside vendors (ie. NWEA), internal assessments created by individual and teacher teams, digital assessment products as well as individual and teacher-team scoring using rubrics and exemplars.
- 4) "How will the EL students' progress be measured? "Becoming proficient" is not measurable." Response: Progress and reclassification of English learners will be measured through the procedures, methods, and assessments outlined on pages 107-110. These are aligned to the requirements imposed by CAASPP and the State Board of Education.
- 5) "Attendance rates will be monitored how? What percentage of growth is expected?" Response: Methods to monitor attendance and enrollment rates are listed at the top of and throughout page 126. PCA's expansion plan, including projected growth in enrollment and attendance is contained in the chart on page 48. This chart represents enrollment growth for each year of expansion as follows: Year 2-75%; Year 3-50%; Year 4-38%; Year 5-11%; and Year 6-7%.
- 6) "How will student academic proficiency be measured? What will be the standard of completion?" <u>Response</u>: PCA will use academic proficiency as determined by the CAASPP and all other state required assessments, as well as proficiency determined by outside testing vendor experts such as NWEA.
- 7) "Where are the Special Education student outcomes listed?" Response: Question 1 Response above addresses all subgroup outcomes, which include Special Education student outcomes. Individual Special Education student outcomes are described on page 115, for inclusion in each student's Individual Education Plan.
- 8) "No percentage of achievement noted in any outcome. IS this located somewhere in the petition?" Response: Included in Question 1 Response above.

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- 9) "Please clarify where in Carmichael you will locate if Creekside is not available. (I was told it is not currently available.)" Response: PCA will seek the support of the District in securing a district owned facility such as Creekside, Sylvan, Carriage, Citrus Heights, Pasadena, (or other school designated for closure at the end of the 2014/15 school year) through a formal Proposition 39 Facility Request. Sharing a district facility that is currently being partially used or rented, such as Orange Grove or Creekside, by Pathway to Choices, Inc., will also be a considered option for the 2015/16 school year. Pathway to Choices, Inc., is currently using four classrooms of the Creekside campus and PCA will explore sharing the facility with Pathway to Choices, Inc. PCA's Board is currently reviewing and considering all district owned facility options that can accommodate PCA's need for 15,000 square feet in Year 1 of operation. The PCA Board is also currently working through a local commercial realtor to ascertain available non-district rental facility options in the Arden Arcade and surrounding areas.
- 10) "MYP is listed on page 95, but not referenced anywhere. Is this an oversight?"

  Response: The MYP-IB (Middle Years Programme-International Baccalaureate) is included in the curriculum matrix listed on page 95, due to the curriculum's design for students aged 11 to 16, the . It is one of the framework options listed that encourages students to become creative, critical and reflective thinkers. The MYP-IB framework was listed, along with other options, as it emphasizes intellectual challenge, encouraging students to make connections between their studies in traditional subjects and the real world. It fosters development of skills for communication, intercultural understanding and global engagement essential qualities for young people who are becoming global leaders. Adopted curriculum of PCA will be based upon the matrix of skills maps and frameworks listed on page 95. The MYP-IB was included in the matrix, as parts or portions may be considered, based upon individual student needs as outlined in paragraph 2 of page 94.
- 11) "When will the PCA courses be submitted for A-G approval, and how likely are they to be approved?" Response: PCA will follow the submission, resubmission, and approval processes and timelines for all of its A-G courses set forth by the University of California for all schools. UC's Online Update website is open for the A-G course submission cycle annually from February 1 September 15. New courses will be submitted to UC for "A-G" review during this time. Courses are approved beginning with the academic year corresponding to the submission cycle the course was approved. Approval for PCA's courses, as with all school submissions to UC, are reviewed by subject area analysts to verify that content meets University standards for college-preparatory coursework. Course approval



will be based on overall "A-G" course criteria and the subject area's course requirements established by UC faculty.

- 12) "Will all credentialed staff be required to be finger-printed that is not what is stated in the petition ?" Response: The Charter School will comply with all fingerprinting requirements outlined in Education Code 44237 and 45125.1 and as stated in the last paragraph of page 145.
- 13) "What about finger-printing volunteers?" Response: The Charter School will comply with all fingerprinting requirements outlined in Education Code 44237 and 45125.1 and as stated in the last paragraph of page 145. As stated on page 159, volunteers who will have direct contact with Paramount students outside of the direct supervision of a credentialed employee shall be fingerprinted and receive background clearance prior to volunteering without the direct supervision of a credentialed employee.
- 14) "Job descriptions for all positions was not provided." Response: The Charter petition is only required to provide employee "qualifications" of individuals to be employed by the Charter School, as outlined in Education Code 47605 (b)(5)(e). Qualifications of all employees are provided in paragraph 1 of page 148. Prior to recruiting and hiring any employee, the Board of Paramount Education Inc., will craft, vet, and approve job descriptions for all positions being filled, including the roles and functions of such positions.
- 15) "No role or function was listed for the Coordinator of Data Systems." Response: The Charter Petition is only required to provide employee qualifications of individuals to be employed by the Charter School, as outlined in Education Code 47605 (b)(5)(e). Qualifications of all employees to be hired and employed, for certain, are provided in paragraph 1 of page 148. The Board of Paramount Education Inc. may consider hiring a Coordinator of Data Systems, depending on Year 2 actual needs. However, PCA is not certain that a Coordinator of Data Systems will, in fact, be employed by PCA and therefore, roles and functions, for such a position, are not included in the Petition.
- 16) "No salary schedules were provided (rates listed): benefits are to be determined." <u>Response</u>: Although no salary schedules are required to be provided in the Charter Petition or any of the petition's appendices, Paramount Education Inc. Board of Directors will finalize, vet through legal counsel, and approve its employee salary schedule for inclusion in its Employee Handbook prior to the recruitment or hiring of any staff.

3510 Hazeltine Lane Roseville, CA 95747 www.pcaeducation.org



- 17) "Specific key qualifications were specified for some positions but not all."

  Response: Per Education Code 47605 (b)(5)(e), qualifications to be met by individuals employed by the charter school, are included in paragraph 1 of page 148 and further delineated on pages 150-158. These key employees will, for certain, be employed by the charter school. All other positions are "projected" or "anticipated" as stated in paragraph 3 of page 148.
- 18) "No declaration regarding charter employees rights to choose to engage in collective bargaining." <u>Response</u>: Included in Question 20 Response below.
- 19) "What about the employees "at will" or gaining permanency?" Response: Included in Question 20 Response below.
- 20) "How will rights be communicated to prospective employees?" Response: Per Education Code 47605 (b) (5) (M) the Charter Petition is only required to describe employees' rights upon leaving employment of their school district to work in the Charter school and any rights of return to the school district in which they were employed prior to any employment with the Charter school. This statue does not delineate how that communication shall take place or any other rights including gaining permanency or collective bargaining. These are not required to be included in Charter petitions. The required Charter school provision regarding return rights are described on pages 191-192. These return rights will be outlined in the Paramount Education Inc. Employee Handbook. At-will status will be included on the employment contracts of every Paramount Education Inc. employee and also outlined in the corporation's Employee Handbook.

Sincerely,

Dawn Contreras Douglas

Founder/CEO

Paramount Education, Inc.

Paramount Collegiate Academy



September 25, 2014

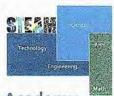
Linda Bessire, Director, Pupil Personnel Services San Juan Unified School District 3738 Walnut Avenue Carmichael, CA 95608

Dear Dr. Bessire,

Enclosed herein are responses to PCA Charter Petition <u>Question Set 21-41</u> posed by your District Review Team on September 18, 2014:

- 21) "Will you provide the PCA procedure for the charter school to notify/communicate with the district in emergency situations?" Response: PCA hopes to collaboratively craft, with the District, a mutually agreeable protocol for notifying and communicating in the event of emergency situations prior to the opening of school in 2015/16.
- 22) "Will you send us a copy of, or detailed outline of, the PCA school safety plan? Response: PCA will forward the District a copy of its PCA School Safety Plan once it has been finalized and approved by the Board of PCA.
- 23) "How will PCA ensure that students with disabilities will be provided with "Least Restrictive Environment" (LRE) and a "Free and Appropriate Education" (FAPE) considerations? Please send us the specific plan to do so." Response: At this time, PCA will operate as a public school of the San Juan Unified School District (SJUSD) for the purposes of providing special education and related services under the IDEA, pursuant to Education Code Section 47641 (b), in accordance with Education Code Section 47646 and 20 U.S.C. 1413, as noted in paragraph 1 of page 111. SJUSD will provide special education services for students enrolled in PCA to the extent required by law. Specifically, SJUSD will (A) serve children with disabilities in the same manner as it serves children with disabilities in its other schools; and/or (B) provide PCA with an equitable share of state and federal special education funding to support special education instruction or designated instruction and services to students enrolled in PCA. PCA reserves the right to contract with agencies and vendors outside the authorizer when appropriate to secure special education services, including administrative support services. Also as stated in paragraph 2 of page 111, PCA anticipates developing a Memorandum of Understanding (MOU) which shall delineate the specific responsibilities and actions of PCA and the District for ensuring LRE and FAPE for all special education students enrolled at PCA. SJUSD will hold ultimate responsibility for providing Special Education services. As outlined on pages 110-119, PCA pledges to work in cooperation





with the District to ensure a Free and Appropriate Education (FAPE) in the Least Restrictive Environment (LRE). LRE is also described in paragraph 3 of page 119.

- 24) "What is the plan to serve students with "severe" disabilities who could not be fully integrated into the educational program offered at PCA?" Response: Included in Question 23 Response above.
- 25) "Please send us the plan for special education support in the areas of Designated Instructional Services (DIS) and School Psychology." Response: Included in Question 23 Response above.
- 26) "What is the process and plan for PCA IEP teams to meet to address individual student needs?" Response: Included in Question 23 Response above and described at the top of page 116, as well as paragraph 2 of page 116.
- 27) "What is the plan to address the needs of a student in Special Education who is not being successful at PCA?" Response: PCA's Network of Student Support will be utilized to address the needs of all students, including special education students, who are not being successful. The aspects, mechanisms, and strategies for this support network are explained on pages 103-106, as well as page 111 and 112. Additionally, PCA intends to work collaboratively with SJUSD regarding special education identification and qualification, with these areas being addressed and outlined in the MOU between SJUSD and PCA.
- 28) "During the class placement assessment, will student's be able to use their testing accommodations as outlined in their IEP?" Response: PCA will follow all testing accommodations, as specifically outlined in each student's Individual Education Plan (IEP).
- 29) "What is your RTI process?" SST process?" Response: PCA's Network of Student Support will be utilized to address the needs of all students, including special education students, who are not being successful. The aspects, mechanisms, and strategies for this network are explained on pages 103-106, as well as page 111 and 112. The strategies and processes outlined on these pages will be used as PCA's Response to Intervention (RTI) process for students who are not being successful. The Student Success Team (SST) process is described in paragraph 4 of page 112. The forms for the PCA SST process, are directly from the California Dropout Prevention Network's California Department of Education (CDE) 2000 publication and are located in Petition Appendix R. These will be utilized and followed until the new SST publication is available from CDE. This publication is currently being revised by CDE and is not yet available on the CDE website (as of the date of this letter). PCA's Board and Development Team are finalizing, vetting (though





legal counsel) and Board approving an SST Manual that will be available prior to the opening of school in 2015/16. The following general SST steps are being included in PCA's SST Manual: a) The general education teacher speaks to the SST coordinator (who is an appointment of the principal) about planning an SST. b) The SST time is scheduled and all who need to attend are notified by the general education teacher. Participants to consider are previous and current general education teachers, school psychologist, administrator(s), speech therapist, and/or other intervention specialists. Parents are always included. c) Parents should be notified on the day of the SST as a reminder, if possible. d) The meeting is held and a summary form is completed by the team, e) The people responsible for the interventions are notified by the facilitator designated at the meeting. f) Interventions are implemented (with oversight from the general education teacher), a) A follow-up meeting is scheduled and held to discuss whether the interventions showed progress or not, and what the next steps in the intervention process may be. The SST follow up form is used. The follow up can be planned as soon as four weeks after the initial SST. h) If the interventions did not reflect growth, the SST follow up team lists new actions, which may include: further or alternative instructional modifications, groupings, program assignments, or referral for special education testing.

- 30) "What is the pre-intervention plan?" Response: The pre-intervention plan and process is discussed and summarized in paragraph 4 of page 112.
- 31) "Who will be completing the SpEd assessments?" Response: Included in Question 23 Response above and also referenced on page 117 as follows: "In addition to the above special education staff, PCA also seeks related services from SJUSD for special education students enrolled in PCA in the same manner as is provided to students in other SJUSD and Sacramento County schools (so long as PCA operates as a public school of the SJUSD for purposes of special education). PCA also reserves the right to contract with service providers outside of the SJUSD/Sacramento County, when appropriate."
- 32) "Who is the special education manager?" Response: The Special Education Manager shall be an employee of Paramount Education Inc. (possibly hired in Year 3 of operations) who assumes the duties listed on page 117 for PCA. The paragraph midway through page 117 also references PCA's right to contract with service providers outside of the SJUSD/Sacramento County, which may include services of a special education manager. The contracted manager will work collaboratively with SJUSD's special education office to ensure that all students receive the services they are entitled to.
- 33) "Who will provide interpreting services?" <u>Response</u>: Included in Question 23 Response above and also referenced on page 117 as follows: "In addition to the above





special education staff, PCA also seeks related services from SJUSD for special education students enrolled in PCA in the same manner as is provided to students in other SJUSD and Sacramento County schools (so long as PCA operates as a public school of the SJUSD for purposes of special education). PCA also reserves the right to contract with service providers outside of the SJUSD/Sacramento County, when appropriate."

- 34) "What is the plan to purchase test kits for all of the SpEd assessments?" Response: Included in Question 23 Response above.
- 35) "There are comments regarding parents, but what about guardians/education rights holders?" Response: The Charter Petition references parents or guardians, beginning on page 77 and ending on page 194. In the event that an adult presents school administration with a signed and validated effective Order Designating Education Rights Holder for any one of its enrolled students, PCA shall honor any and all aspects of the Superior Court of California Order while it is in effect.
- 36) "Does your staff have training in writing, facilitating, and managing IEPs? If not, what types of professional development will there be for IEP management? What will the process be for hiring special education staff?" Response: Included in Question 23 Response above. Additionally, all trainings for special education staff and/or trainings necessary to comply with all special education laws will be attended by staff lacking in any necessary skills or abilities for carrying out all services under the IDEA, pursuant to Education Code Section 47641 (b), in accordance with Education Code Section 47646 and 20 U.S.C. 1413. Training and professional development needs are also addressed in the final section of page 119. The Board of Paramount Education Inc. will finalize, vet (through legal counsel), and board approve the protocols and processes for hiring all of its employees two months prior to hiring any staff during the first year of operation. These Board approved processes will be followed in the recruitment and hiring of every staff member. PCA is also interested in collaborating and participating in SJUSD professional development opportunities for its special education staff.
- 37) "What if you cannot find someone who holds both Sped and Gen Ed credentials?" Response: Included in Question 23 Response above. Additionally, PCA will employ one full time teacher who holds the proper credentials to teach a general education subject and will possess a credential in special education as stated in the last paragraph of page 116.. PCA currently has two teachers on its Development Team interested in teaching at the Charter School. Both teachers hold general and special education credentials. Also as noted in the middle paragraph of page 117, PCA may contract for service providers outside of the SJUSD/Sacramento County, when appropriate.





- 38) "What is the plan for years 1-2 before hiring a special education manager? Who will have those duties?" Response: For years 1-2 of operation, PCA plans to operate as a public school of the San Juan Unified School District (SJUSD) for the purposes of providing special education and related services under the IDEA, pursuant to Education Code Section 47641(b), in accordance with Education Code Section 47646 and 20 U.S.C. 1413.
- 39) "What related services are you seeking from SJUSD?" Response: PCA is seeking Special Education services as outlined in Question 23 Response above.
- 40) "What credentials does the principal have in order to act as a special education representative?" Response: Pursuant with PCA operating as a public school of SJUSD for the purposes of providing special education and related services under the IDEA, a representative of the District shall act as the representative, unless otherwise agreed upon.
- 41) "What law firm will you work with for due process complaints?" Response: PCA will work, as any other school, with the District support services, as outlined in the Question 23 Response above. The MOU between SJUSD and PCA shall specify the responsibility/liability in case of due process. As a "school of the district", SJUSD is ultimately responsible for due process. At the bottom of page 118 the Petition notes, "In the event that a parent/guardian files a request for a due process hearing or request for mediation, the SJUSD and PCA shall work together to defend the case, so long as the Charter School operates as a school of the authorizer for special education purposes. In the event that the SJUSD determines that legal representation is needed, the PCA agrees that it shall be jointly represented by legal counsel of the SJUSD's choosing."

Sincerely,

Dawn Contreras Douglas

Founder/CEO

Paramount Education, Inc.

Paramount Collegiate Academy

3510 Hazeltine Lane Roseville, CA 95747 www.pcaeducation.org



September 24, 2014

Linda Bessire, Director, Pupil Personnel Services San Juan Unified School District 3738 Walnut Avenue Carmichael, CA 95608

Dear Dr. Bessire.

Enclosed herein are responses to PCA Charter Petition Question Set 42-55 posed by your District Review Team on September 19, 2014:

- 42) "Please send a copy of the LCFF Calculator referred to on Page 2 of Appendix T" Response: A copy of the California Charter Schools Association's LCFF Calculator, is attached to this letter.
- 43) "Please send the back-up or calculation on the determination of SUI (state unemployment insurance)" Response: Each of the 3 multiyear budget scenarios presented, displays the 0.0161 SUI calculation in the "Notes" section of each budget page. This (1.61%) calculation was derived from the California Charter Schools Association.
- 44) "How did you arrive at the Child Nutrition Revenue? What figures were used?"

  Response: As noted on page 2 of the Budget Narrative, PCA used the 2013-14 federal reimbursement rates for serving breakfast and lunch to estimate Federal Child Nutrition Program Revenue. These Child and Adult Care Food Program (CACFP) rates are posted on the California Department of Education (CDE) website and are as follows: a)

  Breakfast-Free = \$1.58, Reduced-Price=\$1.28; b) Lunch/Supper-Free=\$2.93, Reduced Price=\$2.53. As noted on page 2 of the Budget Narrative, PCA used figures from SJUSD's P-2 2013-14 Budget Report to derive its Free and Reduced Lunch percentage of 50.82%, which translates to 101.64 Average Daily Attendance (ADA) for Free/Reduced Price Lunches (FRPL) and 98.36 ADA for Paid Lunches.
- 45) "Support salary in year 2 is short \$10,000. Do you agree and will you make that correction?" Response: The table of PCA Staffing Projections on page 4 of the Budget Narrative will be changed to list both Coordinator position's annual average starting salary at \$55,000. All employee starting salaries and pay scales will be included in the PCA Employee Handbook and vetted through legal counsel, prior to final review and approval by the PCA Board of Directors.



- 46) "Do you pay Health & Welfare for .5 positions?" Response: As stated on page 190 of the Petition, a comprehensive benefits package (medical, dental, and retirement) will be included as part of each full-time employee's compensation. All full-time employees will receive medical benefits and the option to participate in dental and vision plans. Employees working less than full time (ie .5 positions) assignments will not receive such health and welfare benefits, which will also be outlined in PCA's Board Approved Employee Handbook.
- 47) "Narrative mentions supply increases for new students of \$505 (\$250 consists of technology & \$200 is for textbooks). The \$200 for textbooks seems low especially for middle & high school, what are you plans?" Response: Textbook costs were based on assumptions from the California Charter Schools Associations' budget calculator average as well as research from other public charter school multiyear budgets, including Gateway International School's-GIS (authorized by SJUSD last year) budget. GIS allocated \$170 per student for textbooks and supplies. This total is well below PCA's \$505 estimate. With regard to instructional technology, PCA plans to take full advantage of the myriad of free instructional technology/digital software available through online sites such as Edmodo, the Buck Institute, and Edutopia. Using free instructional resources, will keep instructional costs below PCA's conservative \$505 per pupil projection.
- 48) "The teacher sub projection seems a little high, what will you pay for one full day of sub?" Response: As noted on page 4 of the Budget Narrative, PCA budgeted substitute costs at 4% of the total teacher salaries for each year of the multiyear projection. This conservative estimate is a calculation derived from the California Charter Schools Association, which includes teacher absence due to illness and professional development sub-release days. The average daily rate of teacher substitute pay is \$100-\$140/day among local schools and districts within Sacramento County. The Board of PCA is considering a daily sub rate within this range and after vetting through legal counsel, will approve a daily sub rate for inclusion in its Paramount Employee Handbook.
- 49) "No special education costs were listed except for the \$40K transferred to the LEA, this has not been our process with other charters. What is your plan to cover the costs?" Response: At this time, PCA will operate as a public school of the San Juan Unified School District (SJUSD) for the purposes of providing special education and related services under the IDEA, pursuant to Education Code Section 47641(b), in accordance with Education Code Section 47646 and 20 U.S.C. 1413, as noted in paragraph 1 of page 111 of the Petition. SJUSD will provide special education services for students enrolled in PCA to the extent required by law. Specifically, SJUSD will (A) serve children with disabilities in the same manner as it serves children with disabilities in its other





schools; and/or (B) provide PCA with an equitable share of state and federal special education funding to support special education instruction or designated instruction and services to students enrolled in PCA. With regard to a plan for associated services and costs for such services under IDEA, page 111 of the Charter Petition notes that PCA anticipates developing a Memorandum of Understanding (MOU) which shall delineate the specific responsibilities and actions of PCA and the District for ensuring LRE and FAPE for all special education students enrolled at PCA. SJUSD will hold ultimate responsibility for providing Special Education services. As a school of the District for Special Education, PCA determined the encroachment rate at \$200/ADA, as noted at the bottom of page 6 of the Budget Narrative. As referenced in this section of the Budget Narrative under "Other Outgo", this encroachment rate was estimated using another charter school budget authorized by SJUSD (Gateway International School) last year.

50) "Projected growth in ADA seems exceptionally high, can you please support this? The 2<sup>nd</sup> year is a 75% increase." Response: The projected growth and ADA enrollment projections are provided on page 1 of the Budget Narrative and are in alignment with the PCA Board and Development Team's Expansion Plan to build out the school over 7 years, adding 1 additional high school grade in Years 2-4, as well as expand each existing grade by 25 additional students each year of operation to a capacity of 125 pupils per grade level by Year 7 of operation. These projections are in alignment with research outlined in Need for the Academy Petition section on pages 27-29, Students to Be Served-Target Student Population Petition section found on pages 48-50, Community Recruitment and Outreach Plan section found on pages 162-164, and in Appendix E of the Petition.

51) "Where in the budget can we find the payroll related/benefit costs for the \$50,000 in 14-15?" Response: Included in Question 52 Response below.

52) "In 14-15 \$50,000 salary contract for the Chief Executive Officer for the Start-up year. Is this a salary or a contract? All salaries have payroll related costs." Response: As referenced on page 5 of the Budget Narrative, during the start-up phase, the Chief Executive Officer will be paid as an employee of the school, under a 1 year contract, for services during the year 1 startup phase and until the school's payroll system has been fully implemented and hiring has begun. There will be no health and welfare benefits associated with the contract. The PCA Board will use the IRS 94 series forms to file all necessary employment taxes, including social security and Medicare taxes associated with the contract.

53) "Revenue for In-Lieu of Property tax, Title I, Title II, Title II & Lottery does not reflect the same payment schedules that SJUSD has. Can you please provide the schedules PCA is using?" Response: PCA used the Fiscal Crisis & Management Assistance Team





(FCMAT) payment schedules and cash flow projections from the Budget Explorer (Version 5) program which are located on the FCMAT online website at: http://fcmat.org/budget-explorer/.

54) "Revenue for Federal Grants & Property tax typically defer revenue, this is not reflected in the cash flow. Please explain." Response: Included in Question 53 Response above.

S5) "If the changes in the revenue affect the cash balance, what is PCA's plan?"

Response: PCA has developed a conservative 3-year budget covering all operational costs. This budget includes reserves for economic uncertainty, built over time. General fund revenues will increase each year of operation, as PCA conservatively builds out grades 10, 11, and 12 in Years 2-4 of operation. With Average Daily Attendance increasing in Years 2 and beyond, PCA will become more cost effective to operate. Although no new revenues will be necessary to sustain the school, private grants, especially those targeting funding for STEM/STEAM programs, such as the Honda Foundation Grant are planning to be sought. PCA also has plans to seek other private grants targeting education such as the Ronya and George Kozmetsky Foundation, Walmart, and Lowes Toolbox for Education Grants. PCA will be planning out a fall and spring fundraising campaign and also be applying for E-Rate funding for Internet and telecommunications.

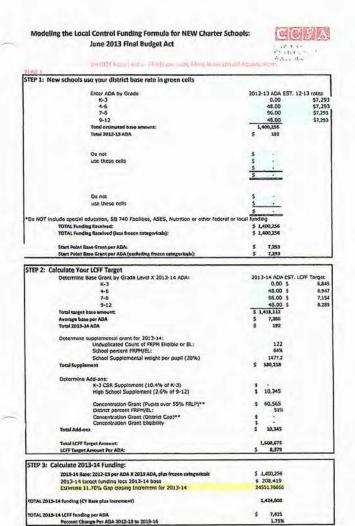
Sincerely,

**Dawn Contreras Douglas** 

Founder/CEO

Paramount Education, Inc.

Paramount Collegiate Academy



STEP 1:		
Enter ADA by Grade	2012-13 ADA EST	12-13 rates
K-3	0.00	\$7,29
4-6	72.00	\$7,29
7-6	144.00	57,291
9-12	120.00	57,293
Total estimated base amount:	5 2,450,448	
Total 2012-15 ADA	\$ 336	
Do not	5	
uso these cells	\$	
	\$ :	
De net		
use these cells	\$ .	
	5 .	
*Do NOT include special education, \$8 740 Facilities, ASES, Nutrition or other for	ideral or local funding	
TOTAL Funding Received:	\$ 2,450,448	
TOTAL Funding Received (less fraten categoricals):	\$ 2,450,448	
Start Point Base Grant per ADA:	5 7,293	
Start Point Dase Grant per ADA (excluding from categoricals):	\$ 7,253	

P 2: Colculate Your LCFF Target	223	STATE OF THE PARTY	Shows
Determine Base Grant by Grade Level X 2013-14 ADA:	201	3-14 ADA 65T. L	
K-3		0.00 \$	6,845
4-6		72.00 \$	6,947
7-8		144.00 \$	7,154
9-12	100	120.00 \$	8,189
Total target hase amount:	5	2,525,040	
Averago base por ADA	\$	7,515	
Total 2015-14 ADA	5	336	
Determine supplemental grant for 2013-14:			
Unduplicated Count of FRPM Eligible or EL:		213.5	
School percent FRPM/EL:		64%	
School Supplemental weight per pupil (20%)		1503	
Total Supplement	5	120,891	
Dotermina Add-ons:			
K-3 CSR Supplement (10.4% of K-3)		C. N. Villa	
High School Supplement (2.6% of 9-12)	5	25,862	
Concentration Grant (Pupils over 55% FRLP)**		107,840	
District percent FRPM/EL:		51%	
Concentration Grant (District Cop)**	\$		
Concentration Grant Eligibility			
Total Add-ons	s	25,862	
Total LCFF Target Amount	s	2,671,792	
LCFF Turgot Amount Per ADA:	5	8,547	

STEP 3: Calculate 2013-14 Funding:	
2013-14 Buse: 2012-15 per ADA X 2013 ADA, plur frozen categoricals	5 2,450,448
2013-14 target funding less 2013-14 base	\$ 421,344
Estimate 24% Cap closing Increment for 2013-14	101122.6012
TOTAL 2015-14 funding (CY Gase plus increment)	2,551,571
TOTAL 2013-14 LCFF funding per AUA	\$ 7,594
Percent Change For ADA 2012-13 to 2013-14	4.13%

STEP 1:		
CAN AND REPORTS	2012-13 ADA EST	
Enter ADA by Grade K-3	0.00	\$7,29
4-6	96.00	57,29
2-8	192.00	\$1,291
9-12	216.00	\$7,293
Tutal estimated base amount:	\$ 5,675,672	-
Total 2012-15 ADA	5 504	
TOTAL DATA		
Do not	\$ .	
use these cells	5 -	
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Do not	\$	
uso theso cells	5 -	
	\$ .	
*Do NOT include special education, SB 740 Facilities, ASES, Nutrition or other fer	deral or local funding	
TOTAL Funding Received:	\$ 3,675,672	
TOTAL funding floorived (less frozen categoricals):	\$ 3,675,672	
Start Point Date Grent per ADA:	\$ 7,233	
Start Point Sase Grant per ADA (excluding frozen categoricals):	\$ 7,291	

STEP 2: Calculate Your LCFF Target	
Determine Base Grant by Grade Level X 2013-14 ADA:	2013-14 ADA EST. LCFF Targe
K-3	0.00 5 6,845
4-6	96.00 S 6.947
7-8	192.00 5 7,154
9-12	216.00 S 8.289
Total target base amount:	5 3,830,904
Average base per ADA	\$ 7,601
Total 2013-14 ADA	\$ 504
Determine supplemental grant for 2013-14:	
Unduplicated Count of FRPN Eligible or EL:	320.25
School percent FRPM/EL:	64%
School Supplemental weight per pupil (20%)	1520.2
Total Supplement	5 426,544
Determine Add-ons:	
K-3 CSR Supplement (10.4% of K-3)	5 -
High School Supplement (2.6% of 9-12)	\$ 46,551
Concentration Grant (Pupils over 55% FRLP)**	\$ 163,612
District percent FRPM/EL:	51%
Concentration Grant (District Cap)**	5 .
Concentration Grant Eligibility	5
Total Add-one	\$ 46,551
Total LCFF Target Amount	\$ 4,564,299
LCFF Target Amount Por ADA:	\$ 8,659

STEP 3: Calculate 2013-14 Funding:		
2013-14 Gase: 2012-13 per ADA X 2013 ADA, plus frozen catogoricals	\$ 3,675,672	
2013-14 target funding less 2013-14 base	\$ 688,627	
Estimate 36% Gap desing Increment for 2013-14	247905.7466	
TOTAL 2013-14 funding (CF flase plus increment)	3,923,578	
TOTAL 2019-24 LCFF funding per ADA	\$ 7,785	
Percent Change For ADA 2012-19 to 2013-14	6.74%	



October 10, 2014

Linda Bessire,
Director, Pupil Personnel Services
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608

Dear Dr. Bessire;

Enclosed herein are responses to PCA Charter Petition <u>Question Set 56-57</u> posed by your District Review Team on October 2, 2014:

56) "Some Ed. Codes cited in the proposal, were not aligned with the CA Code, beginning with ...... i.e. 48900 (r)- 48900.7. Is this a change you would like to make, or did we overlook it?" Response: PCA's Student Suspension and Expulsion Procedures outlined on pages 171-189, "closely mirrors the language of Education Code 48900 et seq," as noted in the second paragraph of page 171. This paragraph also states that "the Charter School has carefully reviewed Education Code 48900 et seq, which outlines and describes the offenses and procedures for suspensions and expulsions." Charter schools are only required to "state the procedures by which pupils can be suspended or expelled" per California Education Code 47605 (b)(5)(J). Charter petitions are not required to list education code 48900 et seq, in their charter petitions. PCA's petition does however, include Education Code 48900 subsections (r) - subsections .7 beginning on page 174 through page 181.

57)"Some Ed. Codes were omitted, was there a reason for the omissions? 48915 (a) (1).......and 48915 (c)......?" Response: Charter schools are only required to "state the procedures by which pupils can be suspended or expelled" per California Education Code 47605 (b) (5) (J). Charter petitions are not required to list education code 48900 et seq, in their charter petitions. However, as noted in the second paragraph of page 171, the suspension and expulsion policy for PCA "closely mirrors the language of Education Code 48900 et seq." Education Code 48915 (a) (1) and 48915 (c) are included within the mandatory and discretionary expellable offenses listed on pages 171-180.

Sincerely,

**Dawn Contreras Douglas** 

Founder/CEO

Paramount Education, Inc.

Paramount Collegiate Academy

# PARAMOUNT COLLEGIATE ACADEMY

#### APPEAL PACKET

Section 3

**Certification of Compliance** 



Enclosed herein Section 3 is the signed Certification of Compliance With Applicable Law as specified in 5 CCR 11967 (b)(3).

#### CERTIFICATION OF COMPLIANCE WITH APPLICABLE LAW

#### lifornia Code of Regulations, Title 5, Section 11967 (b) (3)

A charter petition that has been previously denied by the governing board of a school district may be submitted to the county board of education or the State Board of Education. See Education Code Section 47605 (j)(1). As per Education Code Section 47605 (j)(5), the State Board of Education has adopted regulations implementing the provisions of Section 47605 (j)(1). See Title 5, California Code of Regulations Section 11967 (5 CCR Section 11967).

5 CCR Section 11967 requires that a charter school petition that has been previously denied by a school district must be received by the County Board of Education not later than 180 calendar days after the denial. 5 CCR Section 11967(a). In addition, subdivision (b) (3) of Section 11967 requires the charter petitioner to provide a "signed certification stating that petitioner(s) will comply with all applicable law" when submitting the denied petition to the County Board of Education.

The following certification is submitted in compliance with 5 CCR Section 11967 (b)(3).

#### Certification

By signing below, I certify as follows:

- That I am the authorized representative, and that I am competent and qualified to certify to the facts herein;
- That, as authorized representative, I have personal knowledge of the facts forming the basis of this certification;
- 3. That I make this certification for purposes of 5 CCR Section 11967 (b)(3) only; and
- That the charter petitioner(s) and the charter petition will comply with all applicable law.

Name: Dawn Contreras Douglas, Lead Petitioner

Signature: Dawn Coutteras Douglas

Date: December 19, 2014

School Name: Paramount Collegiate Academy