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GLENDALE UNIFIED SCHOOL DISTRICT

"Preparing our students for *their* future"
223 North Jackson St., Glendale, California 91206-4380
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BUSINESS SERVICES

CERTIFICATION OF BOARD ACTION

ITEM: Action Report No. 1 – Final Action on ISLA Charter School Petition

Motion: Gregory Krikorian
Second: Armina Gharpetian
Ayes: Nayiri Nahabedian, Armina Gharpetian, Gregory Krikorian,
Christine Walters, and Jennifer Freemon
Noes: 0
Absent: 0
Abstain: 0

I HEREBY CERTIFY that the action on the above-listed item was approved by the Board of Education of the Glendale Unified School District at a regular meeting held on the 15th day of December 2015.

A handwritten signature in cursive script, appearing to read "Robert McEntire".

Robert McEntire
Chief Business and Financial Officer



GLENDALE UNIFIED SCHOOL DISTRICT
223 North Jackson St., Glendale, California 91206-4380
Telephone: 818-241-3111

December 15, 2015

STAFF REPORT

International Studies Language Academy Charter Petition

I. BACKGROUND

Petitioners submitted the International Studies Language Academy Charter Petition (“Petition”) to establish and operate the International Studies Language Academy (“ISLA” or “Charter School”) under the oversight of the Governing Board of the Glendale Unified School District (“Board”), beginning in the 2016–17 school year. The Petition was formally received by the Board of the Glendale Unified School District (“District”) on October 20, 2015.

Pursuant to Education Code section 47605, subdivision (b), within 30 days of receiving a petition, the Board must “[hold] a public hearing on the provisions of the charter, at which time the governing board of the school district shall consider the level of support for the petition by teachers employed by the district, other employees of the district, and parents.” On November 17, 2015, the Board held a public hearing to consider the level of support for the Petition from teachers employed by the district, other employees of the district, and parents. Education Code section 47605, subdivision (b) requires the Board to “either grant or deny the charter within 60 days of the receipt of the petition.” The Board must act on whether to grant or deny the Petition during its December 15, 2015 meeting.

If the District grants the Petition, the Charter School becomes a legal entity. Under Education Code section 47605, subdivision (j)(1), if the District denies the Petition, the Petitioners may appeal that denial to the Los Angeles County Office of Education. If the County Office grants the Petition, the County Office becomes the supervisory agency over the Charter School. If the County Office denies the Petition, then Petitioners may appeal to the State Board of Education (“SBE”). (Ed. Code, § 47605, subd. (j)(1).)

II. STANDARD FOR REVIEW OF CHARTER PETITION

Education Code section 47605, subdivision (b), sets forth the following guidelines for governing boards to consider in reviewing charter petitions:

- The chartering authority shall be guided by the intent of the Legislature that charter schools are, and should become, an integral part of the California educational system and that establishment of charter schools should be encouraged.

- A school district governing board shall grant a charter for the operation of a school under this part if it is satisfied that granting the charter is consistent with sound educational practice.
- The governing board of the school district shall not deny a petition for the establishment of a charter school unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the following findings:
 - (1) *The charter school presents an unsound educational program for the pupils to be enrolled in the charter school.*
 - (2) *The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.*
 - (3) *The petition does not contain the number of signatures required by statute.*
 - (4) *The petition does not contain an affirmation of each of the conditions required by statute.*
 - (5) *The petition does not contain reasonably comprehensive descriptions of the required elements of a charter petition.*

In addition to the above considerations, the review and analysis of the Petition was also guided by the regulations promulgated by the SBE for the SBE's evaluation of charter petitions (Cal. Code Regs, tit. 5, §11967.5 et seq. ("Regulations")).

III. STAFF TEAM REVIEW

The Petition was thoroughly reviewed by a team of District staff members who each reviewed the Petition, or sections thereof, as relevant to their area of expertise. The following individuals comprised the staff review team ("Staff Team"):

- Dr. Joel Shawn & Dr. Marc Winger – Co-Interim Superintendents
- Dr. Maria Gandera – Assistant Superintendent, Human Resources
- Dr. Kelly King – Assistant Superintendent, Educational Services
- Dr. Amy Lambert – Assistant Superintendent, Special Education
- Lynn Marso – Assistant Superintendent, Educational Services
- Robert McEntire – Chief Business and Financial Officer
- Dr. Deb Rinder – Executive Director, Secondary Services
- Beatriz Bautista, Director, Special Education
- Dr. Cynthia McCarty-Foley, Director, Human Resources
- Bonnie Gould, Coordinator III, Assessment and Evaluation

Legal review was performed by outside counsel Dannis Woliver Kelley, and fiscal services and operational review was performed by consultant Terri Ryland of Ryland School Business Consulting.

IV. STAFF TEAM RECOMMENDATION

The options before the Board with regard to the Petition are as follows: (1) Approve the Petition; (2) Approve the Petition subject to conditions; or (3) Deny the Petition.

Based upon a comprehensive review and analysis of the Petition by the Staff Team, **denial** of the Petition is recommended.

The recommendation of denial is based on the following conclusions reached by the Staff Team:

- **The Petition fails to provide a reasonably comprehensive description of all required elements of a charter petition [See Findings, Section V-A, pp 3-13];**
- **The Petitioners are demonstrably unlikely to successfully implement the program presented in the Petition; [See Findings, Section V-B, pp. 14-17]; and**
- **The Petition fails to present a sound educational program [See Findings, Section V-C, p. 18].**

Factual findings regarding the most significant areas of concern with the Petition are described below. Please note that this Report *does not exhaustively list every concern, error, omission or deficiency in the Petition*, and focuses on those believed to most greatly impact the Board's decision on whether to grant or deny the Petition. Should the Board take action to deny the Petition, it may adopt this Report as the written factual findings required to support its denial of the Petition.

V. FINDINGS IN SUPPORT OF DENIAL

Review and analysis of the Petition resulted in the following findings:

A. The Petition Fails To Set Forth Reasonably Comprehensive Descriptions of Charter Elements. (Ed. Code, § 47605, subd. (b)(5).)

Education Code section 47605, subdivision (b)(5)(A)-(P), requires a charter petition to include "reasonably comprehensive" descriptions of sixteen elements of the proposed charter school. The Regulations require the "reasonably comprehensive" descriptions required by Education Code section 47605(b)(5) to include, but not be limited to, information that:

- Is substantive and is not, for example, a listing of topics with little elaboration.
- For elements that have multiple aspects, addresses essentially all aspects of the elements, not just selected aspects.
- Is specific to the charter petition being proposed, not to charter schools or charter petitions generally.
- Describes, as applicable among the different elements, how the charter school will:
 - Improve pupil learning.
 - Increase learning opportunities for its pupils, particularly pupils who have been identified as academically low achieving.
 - Provide parents, guardians, and pupils with expanded educational opportunities.
 - Hold itself accountable for measurable, performance-based pupil outcomes.
 - Provide vigorous competition with other public school options available to parents, guardians, and students. (5 C.C.R. § 11967.5.1(g).)

The Petition fails to provide reasonably comprehensive descriptions of the following elements as described below.

Element 1 – Educational Program

Education Code section 47605 (“Statute”) and Regulations require a charter petition to contain a reasonably comprehensive description of the educational program of the school, including, but not limited to, a description of the following: the charter school’s target student population, including, at a minimum, grade levels; approximate numbers of pupils, and specific educational interests, backgrounds, or challenges; the charter school’s mission statement with which all elements and programs of the school are in alignment and which conveys the petitioners’ definition of an educated person in the 21st century; belief of how learning best occurs; goals consistent with enabling pupils to become or remain self-motivated, competent, and lifelong learners; the instructional approach of the charter school; the basic learning environment or environments; the curriculum and teaching methods that will enable the school’s students to meet state standards; how the charter school will identify and respond to the needs of pupils who are not achieving at or above expected levels; how the charter school will meet the needs of students with disabilities, English learners, students achieving substantially above or below grade level expectations; and the charter school’s special education plan, to include the means by which the charter school will comply with the provisions of Education Code section 47641; the process to be used to identify students who may qualify for special education programs and services; how the school will provide or access special education programs and services; the school’s understanding of its responsibilities under law for special education pupils; and how the school intends to meet those responsibilities. (Ed. Code, § 47605(b)(5)(A); Regulations, § 11967.5.1(f)(1).)

The Petition does not contain a sufficient description of the Charter School’s educational program based on the following findings:

1. Target Population, Enrollment Trends.

- Citing to the growing popularity of dual immersion programs and enrollment trends within the District, as well as the current wait list for the District's Foreign Language Academies of Glendale ("FLAG") program, the Petition presumes a need for a second dual language immersion program within District's boundaries. Yet, Petitioners do not acknowledge, and are seemingly unaware, that approximately 87% of FLAG's waiting list at the kindergarten level is comprised of students residing outside of the District's boundaries. Moreover, of the total number of signatures Petitioners obtained in support of the Petition, only 26% are from District families, while the remaining signatures are from individuals residing within the boundaries of various other school districts. The Petition does not make clear why Petitioners believe Glendale students are an appropriate target population, when the vast majority of support for the Petition appears to be from individuals located outside of Glendale. This issue calls into question Petitioner's ability to recruit from within the population of students it desires to serve and to reach the high level of enrollment it projects over the course of its planned term. If the Charter will serve more out-of-district than resident District students, then the local focus of the educational program and the needs of Glendale students is defeated, and the program offers very little, if any, expanded educational program choice to District students.
- As further evidence of the need for a second dual language immersion program, the Petition relies on enrollment trends purporting to show an increase in District elementary school enrollment and a decrease in middle and high school enrollment. Without providing supporting evidence, the Petition concludes that "a primary factor behind the increase (in enrollment) at the elementary level has been increased enrollment in the elementary school two-way dual language immersion and magnet programs," implying that the decrease in enrollment at the middle and high school level is due to a lack of choice schools at this level. (pg. 12) The enrollment trends cited within the Petition are inaccurate; thus, one of the main underpinnings of the Petitioner's understanding of the need for another dual language immersion program is fundamentally flawed and is likely to pose challenges to student recruitment.
- Additionally, ISLA does not offer a high school program, nor is there any specific plan to do so expressed in the Petition, also defeating one of the main reasons identified by Petitioner for the need for another dual language immersion program and one of its key selling points to the community. Given Petitioner's stated purpose of providing a pathway to high-level language acquisition for students entering middle school and beyond, Petitioner's focus on Grades K-8 is inconsistent with this foundational purpose and also likely to affect student recruitment.

2. Curriculum and Instructional Materials

- The description of the Petition's educational program incorporates references to a variety of educational philosophies and approaches, but does not clearly explain how these philosophies interrelate or cohere as one unified educational program. For example:
 - The International Baccalaureate ("IB") framework does not align to Common Core State Standards ("CCSS"), and the Petition does not demonstrate how the curriculum will be modified to address the conflicting standards.
 - The Petition also does not describe how the curriculum and instruction will incorporate the "10 Common Principles from the Coalition of Essential Schools" and how these principles will enhance or supplement instruction in IB and CCSS. The Petition includes a discrete description of each concept and instructional strategy but does not show how these concepts combine to create the curriculum and instructional program for ISLA.
 - Further, there was a general perception from members of the public who spoke at the Public Hearing on November 17, 2015, and from the individuals who completed the District's online survey regarding the Petition, that the Charter School will offer an IB program. However, the budget is devoid of any items or references to IB, leaving the review team to believe Petitioners have not begun the three-year application process necessary to provide IB.
- Implementation of these many instructional strategies, if viable, must be well supported with professional development programs. Other than vague references to the importance of professional development opportunities for its teachers, description of such programs, as well as the budget to support them, is wholly inadequate and lacking. Additionally, while the Petition briefly references onsite coaching and mentorship through its affiliation with International Studies Charter School, these opportunities are subject to the availability of adequate funds and not guaranteed.
- The Petition does not provide a specific description of the instructional materials it intends to use and indicates Petitioners will incorporate instructional materials already in use within the District's FLAG program and International Studies Charter School in Miami, Florida. The Petition does not include sufficient funds to purchase instructional materials, including textbooks in the five target languages (English, French, German, Italian and Spanish). The Petition does not fully explain how Petitioners plan to develop curriculum or cover the cost of said development. The cost of curriculum development for the District's high quality curriculum is approximately \$3

million dollars per year. Yet the Petition does not incorporate any financial or other type of support for continued curriculum development.

3. Transitional Kindergarten

- The Petition does not include a component for transitional kindergarten, and at the Public Hearing the lead Petitioner acknowledged that ISLA did not intend to offer it as part of the proposed program. The California Department of Education (“CDE”) has opined that charters schools offering kindergarten must also provide transitional kindergarten. The lack of a transitional kindergarten in the Charter School’s scheme indicates a lack of awareness as to the basic legal requirements for charter schools and the curricular needs of its students.

4. Staffing

- The staffing provided in the first year of ISLA’s operation is inadequate to support the educational program proposed by the Petition. Within the first year, the Charter School intends to employ 19 general education teachers, one Lead Teacher, and one special education teacher, for a total of 21 teachers for a projected enrollment of 438 students. Based upon the Charter School’s proposed student enrollment per grade level (pg. 16), in order to provide substantive instruction in four target languages in kindergarten through fifth grade, the Charter School would need to employ at least 16 teachers with multiple subject credentials. The Petition proposes a block schedule for students in grades 6-8, which would require an additional 13-15 teachers at the middle school level to ensure all core subjects, physical education, identified electives, and foreign language instruction are provided. In addition to a transitional kindergarten teacher and an additional special education teacher, both of which are necessary given the target student population (but neither of which are accounted for in the Petition), at least 33-35 teachers are required for adequate implementation of the Charter School’s program. As the Petition identifies a need for only 21 teachers, the proposed program is understaffed by approximately 12-14 teachers.

5. Plan for Serving English Learners.

- Little mention is made of the Charter School’s plan for serving English Language Learners (“ELL”), apart from what appears to be boilerplate language taken from CDE’s general guidelines for serving these students. Further, the Petition does not include curriculum and materials intended for implementation for Program 1 and Program 2 ELL students or an analysis of how this instruction will be modified or enhanced by the Coalition of Essential Schools 10 Guiding Principles and other standards.

6. Plan for Serving Students with Disabilities

- ISLA reserves the right to become an independent local educational agency (“LEA”) and join a SELPA (pg. 53) and states its intention to apply to become an LEA member of the El Dorado County Office of Education SELPA. However, it does not appear ISLA has begun the application to become a LEA member of El Dorado SELPA, a process with a substantial (sometimes multi-year) lead time. The Petition also indicates it will operate as a “public school of the District” in accordance with Education Code section 47641(b), which is directly in conflict with its intention to function as an independent LEA, and leaves the District guessing as to the plan ISLA has for serving students with disabilities. Operating as its own LEA member of a SELPA versus operating as a school of the district are two completely different standards and methods for ensuring that the needs of disabled students are addressed, with different liability outcomes, roles and responsibilities for both the District and the proposed Charter School.
- The Petition evidences Petitioners’ lack of understanding of the federal and state legal responsibilities involved in serving individuals with exceptional needs and how the Charter School will meet those responsibilities. The Petition assumes that students are only referred for special education if they do not first appropriately respond to ISLA’s Response to Instruction and Intervention process. (pg. 55) The Petition does not account for those students who might require a referral earlier on in the intervention process. This requirement to exhaust all options in the general education program before a referral for special education is made is in direct contravention of the law which requires a referral for special education and services after the resources of the general education program have been considered, and *where appropriate*, utilized.
- The Charter School intends to employ one full-time teacher possessing a special education credential and only intends to employ a special education coordinator pending budgetary availability. (pg. 59) Despite intending to serve a population representative of the District, namely Franklin Elementary, the Petition overlooks the needs of the students with disabilities represented within the District and the special education and designated instructional services necessary to meet those needs, including but not limited to, speech and language therapy, low incidence services, behavioral support, mental health services, and occupational therapy, among others. It appears Petitioners are not prepared to make available the continuum of options as required by federal and state law.

**Element 2 – Measurable Student Outcomes Identified for Use by the School; and
Element 3 - Method by Which Progress towards Outcomes is Measured**

The Statute and Regulations provide for a charter petition to identify the specific skills, knowledge and attitudes that reflect the school's educational objectives and that can be assessed frequently and sufficiently by objective means to determine satisfactory progress and provide for the frequency of the objective means for measuring outcomes to vary by factors such as grade level, subject matter, and previous outcomes. The pupil outcomes shall align with state priorities. (Ed. Code, § 47605(b)(5)(B); Regulations, §11967.5.1(f)(2).) To be sufficiently detailed, objective means of measuring pupil outcomes must be capable of being used readily to evaluate the effectiveness of and to modify instruction for individual students and for groups of students during the school year. (Regulations, § 11967.5.1(f)(2)(A).)

The Petition does not contain a sufficient description of measurable student outcomes and the method by which those outcomes are measured, based on the following findings:

1. Outcomes Vague. The majority of the outcomes described are vague, impractical and not measurable. For example, several of the outcomes are simply “strive to maintain baseline.” (pg. 88) This does not provide the District with adequate information to determine whether progress toward that outcome was achieved.
2. Inconsistencies in Petition. Several of the outcomes are not consistent with the program plan and expectations outlined elsewhere within the Petition. For example, the annual measurable outcome for English Language Learners is “reclassification at a rate that meets or exceeds comparable school reclassification rates by the third year of enrollment (pg. 93); however, reclassification is projected to occur within 5-7 years of enrollment elsewhere within the Petition. (pg. 51)
3. Outcomes Impractical. Finally, some of the measurable outcomes are impractical based upon the educational program proposed. For example, the student achievement pupil outcome indicates achievement of grade level proficiency in the target language within three years of enrollment within the program. It is not clear how students within the Acquisition track will attain this goal since they are only receiving instruction in the target language every other day pursuant to the proposed block schedule in middle school.

Taken together, these deficiencies give staff little confidence that Petitioners have the requisite level of instructional expertise necessary to run the program described.

Element 4 – Governance

The Statute and Regulations provide for a charter petition to identify the governance structure including, at a minimum, evidence of the charter school's incorporation as a non-profit public benefit corporation, if applicable, the organizational and technical designs to reflect a seriousness of purpose to ensure that the school will become and remain a viable enterprise, there will be active and effective representation of interested parties, and the educational program will be successful. (Ed. Code, § 47605(b)(5)(D); Regulations, §11967.5.1(f)(4).) The Statute and Regulations also require evidence that parental involvement is encouraged in various ways. (*Ibid.*)

The Petition does not contain a sufficient description of the Charter School's governance structure based on the following findings:

1. Lack of Leadership Information. The Charter School is proposed to be run by a nonprofit corporation, the Board of Directors of which may be comprised of anywhere from 3 to 20 members. While several people were introduced at the public hearing as ISLA Board Members, this came as a surprise, as no members of the Board are identified in the Petition. In general, the Petition is devoid of the identities of (a) persons leading the Petition effort; (b) persons who would lead/direct the school itself; and (c) persons who currently serve or are proposed to serve on its Board of Directors. Therefore, any assessment of the expertise, past history of success, and experience of the school's leadership structure is impossible.
2. Inconsistent Governing Documents. A search for ISLA on the CA Secretary of State's business portal reveals that ISLA was officially incorporated as a California nonprofit public benefit corporation, yet only draft documents were provided with the Petition. Further, the draft Bylaws and the Petition are inconsistent with each other regarding compliance of the Board of Directors with the Brown Act; the Petition specifies that the Brown Act meeting notice requirements will be met, but the Bylaws contain operational provisions that are completely at odds with Brown Act compliance. Neither the Petition nor the Bylaws specify where the ISLA Board of Directors will meet, and whether the meetings are proposed to occur in District boundaries. A failure to meet in District boundaries acts as an impediment to parent participation and local community participation in government, and hampers the ability of the District to meet oversight obligations.
3. Conflict Policies. Similarly, the Petition verbiage states that ISLA and the Board of Directors will comply with conflict of interest laws, including the self-dealing prohibitions of Government Code 1090, but its proposed Conflict Code does not reference Government Code 1090 compliance. In addition, the Conflict Code lists designated employee positions that do not correspond to the staffing plans in the Petition or the budget (e.g., they refer to an Executive Director, Chief Business Officer, Director Personnel Services, and others). This lack of congruence between the Petition and the proposed operational policies leads the Staff Team to question whether the Petitioner's fully comprehend these types of transparency and public accountability laws.

Element 5 – Employee Qualifications

The Statute requires the Petition to describe the qualifications to be met by individuals employed by the Charter School. (Ed. Code, § 47605(b)(5)(E).) The Regulations provide that the qualifications should, at a minimum, identify general qualifications for the various categories of employees; ensure the health and safety of the school's faculty, staff, and students, and the academic success of the students; identify the key positions in each category and specify the additional qualifications expected for those positions; and specify applicable legal requirements will be met, including but not limited to credentials as necessary. (Regulations, § 11967.5(f)(5).)

The Petition fails to reasonably comprehensively describe this element, as follows:

1. Teacher Salaries. The Petition identifies the responsibilities and qualifications of teachers in general, and also indicates its intention to pay salaries commensurate with their experience and comparable to the District. The proposed budget indicates that these teachers will be paid a salary of \$48,500 in the first year. The average new teacher hired by the District has approximately eight years of experience, a Bachelor's degree + 42 units which equates to a starting salary of approximately \$62,433 for the 2016/2017 school year. The Petition proposes a salary 29% less than the District's and 44% less than the District's for total compensation, combining salary and benefits, and does not account for the District's stipend for dual immersion teachers. This is not competitive, nor is it a reasonable rate of compensation for the demands described for teachers in the Petition. The benefits budgeted by the Charter School are also far less than competitive and far below what the local teachers currently receive.
2. Teacher Recruitment. Petitioners do not appear to recognize the difficulties in recruiting teachers with the specialized credentials requisite for a dual language immersion program. When recruiting foreign teachers possessing a sojourn certificated employee credential, the teacher's total compensation must meet or exceed the compensation they received in their home country. As the District has experienced, teachers holding a sojourn credential typically cost more than the average District teacher, and significantly more than new hires. The Petition does not adequately account for this added expense. If Petitioner plans to hire an entire teaching staff with no teaching experience in order to achieve the lowest possible compensation, these new teachers will likely lack a depth of dual language experience necessary to successfully implement an effective instructional program.
3. Instructional Aides. The Petition identifies instructional aides who will provide instructional support and assistance to teachers and other certificated personnel. (pg. 170) However, the experience and qualifications for instructional aides within the Petition does not require the aides to be fluent in any of the target languages proposed by the educational program. It is unclear how the instructional aides will provide instructional assistance and support within the classroom if they do not speak the target language.

4. Attendance Accounting. No position is identified to include daily student attendance accounting, maintenance of CALPADs data, and identification of all EL students. These tracking and monitoring duties are critical for school funding and reporting and are a serious oversight.
5. Office Manager. The employment description for Office Manager includes an education requirement of a high school diploma, yet the duties include items normally associated with a credentialed ASB advisor, an accountant, an auditor, accounts payable, payroll, and food services administration. As described in the Petition, this position requires too many duties and skills to assume the job can be adequately staffed by a single individual.

Element 6 – Health and Safety

The Statute requires the Petition to identify the procedures that the Charter School will follow to ensure the health and safety of students and staff. (Ed. Code, § 47605(b)(5)(F).) The Regulations provide the procedures should, at a minimum, require that each employee of the school provide a criminal records summary as described in Education Code section 44237, include the examination of faculty and staff for tuberculosis as described in Education Code section 49406, require immunization of students as a condition of school attendance *to the same extent as would apply if the students attended a non-charter public school*, and provide for the screening of students' vision and hearing and the screening of students for scoliosis to the same extent as would be required if the students attended a non-charter public school. (Regulations, § 11967.5(f)(6).)

The Petition does not contain sufficient description of the Charter School's health and safety procedures based on the following findings:

1. Fingerprinting/Background Check. The Petition's policies for the fingerprinting and background checks of volunteer workers does not adequately account for the safety of Charter school students. The Petition indicates it will comply with Education Code requirements for the fingerprinting and background clearance of Charter School employees and volunteers. However, the policies deviate from the Education Code by allowing volunteers to perform services that are not under the direct supervision of a proposed Charter School employee.
2. Vision, Hearing and Scoliosis Screening. The Petition states students will be screened for vision, hearing and scoliosis (pg. 183); however there is no indication as to who is intended to provide the screenings, such as a school nurse, nor is a properly credentialed screener budgeted.
3. Medication in School. Despite stating a willingness to adhere to Education Code section 49423 regarding the administration of medication in the school, the Petition's policies pertaining to the administration of medication do not align with the relevant Education Code sections, which require the medication to be accompanied by a statement from the prescribing physician describing the name of the medication, method, amount and time schedules by which the medication is

to be taken. Additionally, the budget does not provide for the necessary nurse (or health clerk) to dispense medications.

Element 8 – Admissions Requirements

The Statute and Regulations provide for the charter petition to identify admission requirements that are in compliance with applicable law. (Ed. Code, § 47605(b)(5)(H); Regulations, § 11967.5.1(f)(8).)

The Petition does not contain a sufficient description of the Charter School's admissions requirements, based on the following findings:

1. **Enrollment Preferences.** The enrollment process and preferences described do not meet legal requirements. In the event of a public lottery, only existing students of the Charter School may be exempted, yet ISLA intends to exempt children of Charter School "founders" as well (pg. 199). Additionally, District students must by law be afforded the highest preference in an admissions lottery, yet as a group they are listed fourth, behind siblings of enrolled students, children of employees and children of founders.

Element 10 - Student Suspension and Expulsion Procedures

The Statute and Regulations require the Petition to describe the procedures by which students can be suspended or expelled. (Ed. Code, § 47605(b)(5)(J); 5 C.C.R. § 11967.5(f)(10).)

The Petition does not contain sufficient description of the procedures by which students can be suspended or expelled based on the following findings:

- A. **Willful Defiance.** The Petition indicates the Charter School will regularly update its disciplinary policy to reflect Education Code Section 48900 et seq., and what follows is a recitation of those procedures. However, while the Petition identifies willful defiance as a possible reason for suspension or expulsion (pg. 206), no mention is made of Assembly Bill No. 420 (Stats. 2014, ch. 660) which expresses a *public policy* that children in kindergarten or any of grades 1 to 3 should not be suspended for willful defiance, and no student through grade 12 should be recommended for expulsion for willful defiance, in part because discipline for willful defiance has been disproportionately used to discipline minority students. We note that while a charter school is not legally required to follow statutory student discipline procedures contained in the Education Code, this Petitioner has chosen to follow those standards but does not seem to be aware of recent legal and policy developments in this area that have significant consequences for students.
- B. **Due Process.** Neither the suspension nor expulsion procedures in the Petition provide for an opportunity to appeal a suspension or expulsion. This may violate a student's due process rights, as the Petition states that the Board's decision to expel shall be final.

B. The Petitioners are Demonstrably Unlikely to Successfully Implement the Program. (Ed. Code, § 47605, subd. (b)(2).)

In determining whether Petitioners are demonstrably unlikely to succeed in implementing their educational program, the Regulations require consideration of, among other items:

- Whether the petitioners have a past unsuccessful history of involvement in charter schools or other education agencies.
- Whether petitioners are unfamiliar with the content of the petition or the requirements of law that would apply to the proposed charter school.
- Whether petitioners have presented an unrealistic financial and operational plan for the proposed charter school, including:
 - An administrative services structure that reflects an understanding of school business practices and expertise to carry out the necessary administrative services, or a reasonable plan and time line to develop and assemble such practices and expertise.
 - The adequacy and reasonableness of the operational budget, start-up costs, and cash flow, and financial projections for the first three years, including reasonable estimates of all anticipated revenues and expenditures necessary to operate the school, including, but not limited to, special education based, when possible, on historical data from schools or school districts of similar type, size, and location.
 - A budget that in its totality appears viable and over a period of no less than two years of operations provides for the amassing of a reserve equivalent to that required by law for a school district of similar size to the proposed charter school.
 - In the area of facilities, description of the types and potential location of facilities needed to operate the size and scope of educational program proposed in the charter, including evidence of the type and projected cost of the facilities that may be available in the location of the proposed charter school and reasonable costs for the acquisition or leasing of facilities to house the charter school, taking into account the facilities the charter school may be allocated under the provisions of Education Code section 47614.

The Petitioners are demonstrably unlikely to succeed in implementing their proposed program, based on the following findings:

1. Educational Program Staffing

- The Staff Team has concerns regarding the Charter School's ability to provide adequate staffing to implement the dual immersion program in the four target languages identified in grades K-7 within its first year and grades K-8 in years two through five. As mentioned above, the Petition proposes employing 19

teachers within its first year but does not adequately explain how 19 teachers is sufficient to provide instruction in four target language for grades K-7 at the stated 23:1 class size ratio, especially considering that the projected enrollment numbers include 96 kindergarten students and 96 first grade students in Year One. Inadequate staffing will inhibit the core program of dual language immersion in four languages from being implemented.

2. Administrative Services Plan

- The Petition states that International Studies Charter School, Inc., in Miami Florida was instrumental in developing ISLA's middle school plan. (pg. 10) It appears ISLA intends to continue collaborating with that school's principal, Victoriano Rodriguez, for curriculum, instructional support, and future development projects, and ISLA reserves well over \$250,000 for this collaboration over the course of five years. However, details of the proposed collaboration are not identified by the Petition. The Staff Team also questions whether it is appropriate or permissible for a public charter employee in Florida to act as a paid consultant to an unrelated California charter school.
- Per the budget narrative, a company called "Academica" will be responsible for the ISLA's bookkeeping and financial reporting. Academica is located in Miami, Florida, and review of their website reveals only a single customer in California – one charter school in Los Angeles. Based on numerous and serious errors in ISLA's proposed budget and multi-year financial plan, the Staff Team does not believe that Academica has the knowledge or experience in California to support a start-up charter school. See further comments on the Budget/Financial Plan, below.

3. Budget/Financial Plan

- The Budget and Financial Plan for ISLA is wholly inadequate, relying on overstated revenues and under estimated expenses for the program described in the Petition. When the Staff Team attempted to model a budget using realistic assumptions for revenues and expenditures and based on the Franklin program it intends to emulate, the budget showed ISLA operating at a *significant financial deficit* in every year.

For example:

Petitioners are looking to follow the "90/10 model" of dual language immersion currently in use at Franklin Magnet School in the District. While the District's 2014-15 Unduplicated Pupil Count ("UPC") percentage for its disadvantaged students districtwide is 55.8%, the Free and Reduced Rate for Franklin Magnet School is only 25.1%. The Charter School uses a UPC percentage of 55% for each year to develop its revenue projections. The difference between assuming that the Charter School's UPC will mirror the District's UPC as a whole rather than reflecting the most similar students is material to the revenue calculations of

the Charter. When revenues are based on the demographics at Franklin, the total negative revenue impact over four years could be as much as \$766,000.

- The budget includes \$171/student annually for One-Time Mandate Revenue. By definition, one-time money is anticipated to be received only one time. To budget these windfall revenues each year results in overstated revenues. The total impact is \$465,000 overstated revenues over four years.
- The budget narrative states “*Insofar as is feasible, teachers will be paid salaries commensurate with their experience and comparable to GUSD. A competitive benefits program will be developed for teachers and staff to enhance retention and employment satisfaction.” (pg. 3) Both the salaries and benefits budgeted by the Charter School are far less than competitive and far below what the local teachers are currently being paid. The Charter School proposes compensation to employees that is significantly less than the compensation packages offered by the District. One such difference is that Charter School classified employees will not be members of PERS. While this saves the Charter School 12-20% annually in terms of statutory benefits, it costs employees significantly in lost retirement benefits. Teacher recruitment for positions that pay so poorly for a language immersion program will be problematic as it will likely reduce the quality of the employee pool and diminish the quality of the programs and services the Charter School would potentially provide to students and families.
- Instead of budgeting for furniture, textbooks and curricula expenses each year, ISLA is proposing to borrow funds to pay for these costs over five years. Only capital assets with a useful life over five years should be financed. The budget assumes lease payments for Furniture, Fixtures and Equipment of \$111,000 per year, and 40% of that is slated for texts/curricula (about \$97/student annually for text/curricula for four years.) Twenty percent of the payments, or \$48/student annually, are allocated for leased computer equipment (computers, laptops, smart boards.) Over four years, that is less than \$200/student for laptops, computers and smart boards. For the sake of comparison, the District is currently planning for new adoptions of curriculum in all subject areas and anticipates it will cost approximately \$1308/student for all subjects. The submitted budget for texts, curricula and technology appears low by at least half, on a per-pupil basis.
- Special education encroachment costs are significantly under-budgeted. Special education students represent approximately 12% of the District's total student population. On average, the District spends approximately \$18,000 per special education student, compared to \$8,000 per general education student. The District's current rate of encroachment is 10.5% of its general fund, but ISLA has budgeted only 2.4% of its general fund to

pay excess costs of special education services over the revenues it will receive for special education services.

- A total professional development budget of \$10,000 means 23 certificated teaching staff will have \$435 each for professional development opportunities offered “locally and nationwide.” This is likely inadequate, especially for a new school and given the broad range of curricular and instructional methodologies proposed by the Petition. As a point of comparison, the District currently spends more than \$2750 per teacher for professional development opportunities. Long distance travel to out-of-state seminars will not be possible.
- Custodial costs for a school the size of ISLA are about half of what is necessary to maintain school facilities to an adequate standard. In addition, maintenance has been budgeted at 0.4% of ISLA’s budget, compared with the state-mandated standards for district facilities of 3% of a district’s budget.
- Petitioners confuse the concepts of budget and cash flow, resulting in a duplication of revenue and expenses in the budget. In particular, the budget includes cash flow loan proceeds as revenue, while also considering state apportionment payments as revenue. Booking both the receivable (revenues to come) and the temporary cash borrowing as revenue results in a double counting of revenue and expenses.

4. Charter School Location/Facility

- Education Code section 47605(a) requires charter school petitions to identify a single location within its authorizers boundaries, and to identify the facilities to be used by the school. The Petition fails to offer anything definitive regarding the facility plan for ISLA. The Petition does not identify a proposed location, but states only its intent “to locate ISLA in south Glendale ... below or around State Route 134/Ventura Freeway.” (pg. 14) While the Petition lays out a vision for its ideal space design, and identifies potential sources of funds to develop a private facility, the information provided is inadequate and underestimates how much time it will take to find land or space and develop a facility that is appropriate for use as a public school and to obtain the appropriate City permits. Although the Petition references as an alternative using a District facility under Proposition 39, the Petitioners did not submit a request for facilities by the November 1, 2015 deadline.

Given these caveats and the tentative nature of Petitioner’s final facility location, it is unknown whether the budget adequately provides for facilities lease costs, or whether ISLA could find a facility in time to open in the fall of 2016. The Petition does not offer any specific information regarding even potential or available facilities.

C. The Petition Fails to Present a Sound Educational Program (Ed. Code § 47605, subd. (b)(1).)

The Regulations define an “unsound education program” as one that involves activities that the SBE determines would present the likelihood of physical, educational, or psychological harm to the affected pupils; or that the SBE determines not to be likely to be of educational benefit to the pupils who attend. (Regulations, § 11967.5.1(b)(1), (2).)

1. The Petition fails to set out a sound educational program for the reasons described in section V-A above with regard to the deficiencies in the description of the Education Program proposed by the Charter School, which findings are hereby restated.

VI. CONCLUSION

For the reasons stated above, the Petition, as submitted, fails to provide a reasonably comprehensive description of several essential charter elements; suggests that the Petitioners are demonstrably unlikely to successfully implement the program presented in the Petition; and presents an unsound educational program. Accordingly, it is recommended by the District Staff Team that the Petition be denied. Should the Board take action to deny the Petition, it may adopt this Report as the written factual findings required to support its denial of the Petition.



December 23, 2016

Mr. Thomas A. Saenz, President
Members of the Board of EducaRon
Los Angeles County Office of EducaRon
9300 Imperial Highway
Downey, CA 90242

Re: International Studies Language Academy Rebuttal to Glendale Unified School District factual findings Staff Report and Recommendation

Dear Mr. Saenz and Members of the Board of EducaRon,

The peRRoners and board members of InternaRonal Studies Language Academy (ISLA) received Glendale Unified School District's (GUSD) Staff Report and recommendaRon ("Staff Report") of the InternaRonal Studies Language Academy charter school peRRon ("PeRRon") via electronic mail on December 11, 2015. ABer careful review of the Staff Report, it is ISLA's strong belief that the factual findings made in the report do not meet the required threshold for denial as recommended and ulRmately adopted by the GUSD Board of EducaRon in a unanimous vote that resulted in the denial of the PeRRon on December 15, 2015.

On Tuesday, December 22, ISLA learned that it was recommended for Public Charter Schools Grant Program funding. This award is condiRoned upon authorizaRon by May 13, 2015. Accordingly, we respecQully request to be heard by the February 9, 2016, Los Angeles County Office of EducaRon (LACOE) Board of EducaRon meeRng. Should LACOE deny the appeal, this Rmeframe allows the peRRoners to Rmely seek authorizaRon from the State Board of EducaRon without prejudice to the grant award.

It is the peRRoner's posiRon that ISLA was not afforded due process and that the GUSD Board of EducaRon was severely hampered in making an informed decision due to an overwhelming presence of misrepresentaRons of law, inaccurate reporRng of informaRon actually contained in the PeRRon, and a misreading and misinterpretaRon of certain elements in the PeRRon that are described in detail in the rebuT al below to the factual findings Staff Report. Please note that the *italicized* paragraphs are the original factual findings excerpts while the non-italicized paragraphs reflect the peRRoner's response to the corresponding factual finding excerpts.

I. BACKGROUND

Petitioners submitted the International Studies Language Academy Charter Petition ("Petition") to establish and operate the International Studies Language Academy ("ISLA" or "Charter School") under the oversight of the Governing Board of the Glendale Unified School District ("Board"), beginning in the

2016–17 school year. The Petition was formally received by the Board of the Glendale Unified School District (“District”) on October 20, 2015.

Pursuant to Education Code section 47605, subdivision (b), within 30 days of receiving a petition, the Board must “[hold] a public hearing on the provisions of the charter, at which time the governing board of the school district shall consider the level of support for the petition by teachers employed by the district, other employees of the district, and parents.” On November 17, 2015, the Board held a public hearing to consider the level of support for the Petition from teachers employed by the district, other employees of the district, and parents. Education Code section 47605, subdivision (b) requires the Board to “either grant or deny the charter within 60 days of the receipt of the petition.” The Board must act on whether to grant or deny the Petition during its December 15, 2015 meeting.

If the District grants the Petition, the Charter School becomes a legal entity. Under Education Code section 47605, subdivision (j)(1), if the District denies the Petition, the Petitioners may appeal that denial to the Los Angeles County Office of Education. If the County Office grants the Petition, the County Office becomes the supervisory agency over the Charter School. If the County Office denies the Petition, then Petitioners may appeal to the State Board of Education (“SBE”). (Ed. Code, § 47605, subd. (j)(1).)

Response:

International Studies Language Academy (ISLA) firmly maintains that the Petition to establish and operate a charter school under the oversight of Glendale Unified School District was received at a public Glendale Unified School District (GUSD) Board meeting on October 6, 2015, not October 20, 2015, the date stated in the GUSD December 15, 2015 Staff Report. ISLA’s Petition was publicly submitted and date stamped on October 6, 2015, as may be verified in the attached Petition, in the manner described in GUSD’s Administrative Regulation 0420.4(C)(2) (Exhibit A). Said policy states that “For the purpose of this regulation, submission and receipt of a petition means the date of presentation of the petition to the Board at a public meeting, not the date the petition was received by the district.” This was affirmed by electronic correspondence from Dr. Kelly King, GUSD’s Assistant Superintendent, Educational Services, who was also one of the District staff members who reviewed the Petition as named in the Staff Report. Specifically, Dr. King indicated (Exhibit B) that “You’d submit during public communication . . . Then we have 30 days to schedule the public hearing.” Therefore, ISLA maintains that GUSD did not meet its statutory obligation, pursuant to California Education Code § 47605(b), to hold a public hearing within 30 days of receiving a Petition to establish a charter school, nor did GUSD meet the statutory mandate to either grant or deny the charter within 60 days of receipt of the Petition as required by Education Code § 47605(b). GUSD’s delay in statutory compliance to the prescribed timelines, despite repeated attempts to remedy the same, is concerning to the ISLA Board.

On December 15, 2015, the GUSD Board of Education unanimously denied ISLA’s Petition. On December 17, 2015 at a publicly noticed ISLA Governing Board meeting, the ISLA Board resolved to submit an appeal to Los Angeles County Office of Education, pursuant to Education Code § 47605(j)(1).

II. STANDARD FOR REVIEW OF CHARTER PETITION

Education Code section 47605, subdivision (b), sets forth the following guidelines for governing boards to consider in reviewing charter petitions:

- *The chartering authority shall be guided by the intent of the Legislature that charter schools are, and should become, an integral part of the California educational system and that establishment of charter schools should be encouraged.*

- *A school district governing board shall grant a charter for the operation of a school under this part if it is satisfied that granting the charter is consistent with sound educational practice.*
- *The governing board of the school district shall not deny a petition for the establishment of a charter school unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the following findings:*

(1) The charter school presents an unsound educational program for the pupils to be enrolled in the charter school.

(2) The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

(3) The petition does not contain the number of signatures required by statute.

(4) The petition does not contain an affirmation of each of the conditions required by statute.

(5) The petition does not contain reasonably comprehensive descriptions of the required elements of a charter petition.

In addition to the above considerations, the review and analysis of the Petition was also guided by the regulations promulgated by the SBE for the SBE's evaluation of charter petitions (Cal. Code Regs, tit. 5, §11967.5 et seq. ("Regulations")).

Response: "

The standard for review described in the GUSD Staff Report is a recitaRon of state law and regulaRons, " and as such does not require a response. ISLA maintains that these laws must be applied without bias " and in a fair and objecRve manner of review, and given GUSD's inability to comply with prescribed " Rmelines, calls into quesRon GUSD's ability to complete a fair and accurate review under the stated " standards. "

III. STAFF TEAM REVIEW

The Petition was thoroughly reviewed by a team of District staff members who each reviewed the Petition, or sections thereof, as relevant to their area of expertise. The following individuals comprised the staff review team ("Staff Team"):

- *Dr. Joel Shawn & Dr. Marc Winger – Co-Interim Superintendents*
- *Dr. Maria Gandera – Assistant Superintendent, Human Resources*
- *Dr. Kelly King – Assistant Superintendent, Educational Services*
- *Dr. Amy Lambert – Assistant Superintendent, Special Education*
- *Lynn Marso – Assistant Superintendent, Educational Services*
- *Robert McEntire – Chief Business and Financial Officer*
- *Dr. Deb Rinder – Executive Director, Secondary Services*
- *Beatriz Bautista, Director, Special Education*
- *Dr. Cynthia McCarty-Foley, Director, Human Resources*
- *Bonnie Gould, Coordinator III, Assessment and Evaluation*

Legal review was performed by outside counsel Dannis Woliver Kelley, and fiscal services and operational review was performed by consultant Terri Ryland of Ryland School Business Consulting.

Response:

The Staff Report asserts that the PeRRon was thoroughly reviewed by members of the GUSD staff. ISLA is concerned with the validity of this statement, as many of the factual findings identified in the report are inaccurate or a misrepresentation of what is contained within the PeRRon. Furthermore, many of the cited findings match verbatim to factual findings from other authorizers the ISLA team was able to review. Lastly, the actions and tone of the Board of Education and administrative staff, prior to and throughout the PeRRon review process, have been consistently unfavorable. Most notably, Gregory Krikorian, GUSD Board of Education Member publicly stated on dais, "It would be hard pressed for us, really, to have a charter here" at the GUSD Board of Education meeting on July 14, 2015 (01:55:45).

IV. STAFF TEAM RECOMMENDATION

The options before the Board with regard to the Petition are as follows: (1) Approve the Petition; (2) Approve the Petition subject to conditions; or (3) Deny the Petition.

*Based upon a comprehensive review and analysis of the Petition by the Staff Team, **denial** of the Petition is recommended.*

The recommendation of denial is based on the following conclusions reached by the Staff Team:

- ***The Petition fails to provide a reasonably comprehensive description of all required elements of a charter petition [See Findings, Section V-A, pp 3-13];***
- ***The Petitioners are demonstrably unlikely to successfully implement the program presented in the Petition; [See Findings, Section V-B, pp. 14-17]; and***
- ***The Petition fails to present a sound educational program [See Findings, Section V-C, p. 18].***

Factual findings regarding the most significant areas of concern with the Petition are described below. Please note that this Report does not exhaustively list every concern, error, omission or deficiency in the Petition, and focuses on those believed to most greatly impact the Board's decision on whether to grant or deny the Petition. Should the Board take action to deny the Petition, it may adopt this Report as the written factual findings required to support its denial of the Petition.

Response:

The Staff Report states that "this Report does not exhaustively list every concern..." Education Code § 47605 states that, "the governing board of the school district shall not deny a petition for the establishment of a charter school unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the following findings." Throughout the Staff Report, there are generalized statements and impressions unsupported by data and not specific to the PeRRon, suggesting that the reviewers were unable to correlate their predisposed position to the actual ISLA PeRRon. ISLA can only respond to specifically identified factual findings. If other factual findings are relied upon in the determination to deny the peRRon, and ISLA is not made aware of said facts, ISLA is not accorded adequate due process.

Neither GUSD Board of Education nor their staff opted to take advantage of their own policy (Administrative Regulation 0420.4(D)(5)) (Exhibit A) which states, "During the time in which a petition is

being evaluated, District staff and petitioners may draft a Memorandum of Understanding that clarify matters in the charter, address those matters not provided in the charter, and set forth the charter school's and District's responsibilities regarding the operation of the charter school." The desire for collaboraRon was also asserted in the PeRRon. "The petitioners affirm their willingness to execute one or more memoranda of understanding (MOU) to specify the financial and operational agreements between the District and ISLA. Any such MOUs may be reviewed on an ongoing basis by the GUSD Board and ISLA's School Board and adjusted as necessary and agreed to by both parties" (PeRRon, page 14). The peRRoners invited staff and board members on several occasions to open an MOU to create a dialogue which ISLA believes would have eliminated many of the findings presented in the Staff Report. Unfortunately, the GUSD Board of EducaRon members declined each aTempt to engage in dialogue during the peRRon evaluaRon period (Exhibit C). To no avail, California Charter Schools AssociaRon (CCSA), California's leading charter school advocacy associaRon, also wrote to the GUSD Board of EducaRon (Exhibit D) requesRng, "In the spirit of collaboration, we respectfully request that the district staff and board members engage in an open dialogue with this team regarding concerns and desired changes to the proposal, to build the foundation for a long-lasting, local partnership that provides another high-quality public school option for Glendale families."

V. FINDINGS IN SUPPORT OF DENIAL

Review and analysis of the Petition resulted in the following findings:

A. The Petition Fails To Set Forth Reasonably Comprehensive Descriptions of Charter Elements. (Ed. Code, § 47605, subd. (b)(5).)

Education Code section 47605, subdivision (b)(5)(A)-(P), requires a charter petition to include "reasonably comprehensive" descriptions of sixteen elements of the proposed charter school. The Regulations require the "reasonably comprehensive" descriptions required by Education Code section 47605(b)(5) to include, but not be limited to, information that:

- Is substantive and is not, for example, a listing of topics with little elaboration.
- For elements that have multiple aspects, addresses essentially all aspects of the elements, not just selected aspects.
- Is specific to the charter petition being proposed, not to charter schools or charter petitions generally.
- Describes, as applicable among the different elements, how the charter school will:
 - Improve pupil learning
 - Increase learning opportunities for its pupils, particularly pupils who have been identified as academically low achieving.
 - Provide parents, guardians, and pupils with expanded educational opportunities.
 - Hold itself accountable for measurable, performance-based pupil outcomes.
 - Provide vigorous competition with other public school options available to parents, guardians, and students. (5 C.C.R. § 11967.5.1(g).)

The Petition fails to provide reasonably comprehensive descriptions of the following elements as described below.

Element 1 – Educational Program

Education Code section 47605 ("Statute") and Regulations require a charter petition to contain a reasonably comprehensive description of the educational program of the school, including, but not limited to, a description of

the following: the charter school's target student population, including, at a minimum, grade levels; approximate numbers of pupils, and specific educational interests, backgrounds, or challenges; the charter school's mission statement with which all elements and programs of the school are in alignment and which conveys the petitioners' definition of an educated person in the 21st century; belief of how learning best occurs; goals consistent with enabling pupils to become or remain self-motivated, competent, and lifelong learners; the instructional approach of the charter school; the basic learning environment or environments; the curriculum and teaching methods that will enable the school's students to meet state standards; how the charter school will identify and respond to the needs of pupils who are not achieving at or above expected levels; how the charter school will meet the needs of students with disabilities, English learners, students achieving substantially above or below grade level expectations; and the charter school's special education plan, to include the means by which the charter school will comply with the provisions of Education Code section 47641; the process to be used to identify students who may qualify for special education programs and services; how the school will provide or access special education programs and services; the school's understanding of its responsibilities under law for special education pupils; and how the school intends to meet those responsibilities. (Ed. Code, § 47605(b)(5)(A); Regulations, § 11967.5.1(f)(1).)

The Petition does not contain a sufficient description of the Charter School's educational program based on the following findings:

1. Target Population, Enrollment Trends.

- *Citing to the growing popularity of dual immersion programs and enrollment trends within the District, as well as the current wait list for the District's Foreign Language Academies of Glendale ("FLAG") program, the Petition presumes a need for a second dual language immersion program within District's boundaries. Yet, Petitioners do not acknowledge, and are seemingly unaware, that approximately 87% of FLAG's waiting list at the kindergarten level is comprised of students residing outside of the District's boundaries. Moreover, of the total number of signatures Petitioners obtained in support of the Petition, only 26% are from District families, while the remaining signatures are from individuals residing within the boundaries of various other school districts. The Petition does not make clear why Petitioners believe Glendale students are an appropriate target population, when the vast majority of support for the Petition appears to be from individuals located outside of Glendale. This issue calls into question Petitioner's ability to recruit from within the population of students it desires to serve and to reach the high level of enrollment it projects over the course of its planned term. If the Charter will serve more out-of-district than resident District students, then the local focus of the educational program and the needs of Glendale students is defeated, and the program offers very little, if any, expanded educational program choice to District students.*

Response:

The petitioners maintain that Glendale students are the appropriate target population. GUSD has an extensive two-way, dual language immersion program that spans seven languages across ten schools and attracts far more applicants than it can fill each year. The existing students within the French, German, and Italian FLAG program, solely offered at Benjamin Franklin Elementary, only comprise one cohort per grade and do not have an additional immersion program option in the middle school as do all the other languages in the GUSD FLAG programs. This is in essence what catalyzed the desire to establish ISLA. In fact, in addition to the signatures that were submitted to support the establishment of ISLA, there are another 109 signatures (Exhibit E) of Benjamin Franklin Elementary families that petitioned for the establishment of ISLA, primarily for its additional middle school program - a program that GUSD has declined to offer. ISLA did not provide these signatures for inclusion in GUSD's petition review as ISLA wanted to preserve a spirit of goodwill and collaboration as was affirmed in the petition and ISLA had already otherwise secured the requisite number of signatures for the petition's submission. "The

petitioners affirm that success for ISLA is directly linked to success at GUSD's Franklin Magnet School and other nearby immersion schools. The petitioners do not intend to replace any of the excellent programs that GUSD has already in place" (PeRRon, page 14).

Reviewers "call[s] into question Petitioner's ability to recruit from within the population of students it desires to serve and to reach the high level of enrollment it projects over the course of its planned term." Combining the 327 signatures that the peRRoners submitteD for review together with the 109 that were held back for goodwill, almost yield the projected 438 first-year student enrollment in its enRrety.

The need for addiRonal dual immersion program opRons is supported by those who signed the PeRRon and by the overwhelming number of families who apply to these GUSD programs annually and are not accepted due to the limited capacity of the program. As evidenced on Exhibit F, May 1, 2014, Franklin [Magnet] Advisory [Council] Minutes, "Lottery: We received 726 total applications to date; 493 students. Each language had over 100 applicants" this, for less than 100 spots. Minutes from the March 27, 2014, Franklin Magnet Advisory Council Meeting (Exhibit G) further disaggregate these applicaRons by target language program: 282 applicants for Spanish, 187 for French, 102 for German and 122 for Italian. These numbers clearly indicate parent demand for expansion of these target language immersion opRons in the Glendale community.

Geographically a small district, GUSD is flanked by four other school districts within close proximity - Los Angeles Unified School District, Pasadena Unified School District, Burbank Unified School District, and La Canada Unified School District - making commuRng across these school district borders easy. AdmiUng out-of-district students is a pracRce from which GUSD's own Foreign Language Academies of Glendale (FLAG) program partakes. Schools that are part of the FLAG program include: Benjamin Franklin Elementary (aka Franklin Magnet School), Thomas Edison Elementary, Keppel Elementary, John Muir Elementary, R.D. White Elementary, Verdugo Woodlands Elementary, Thomas Jefferson Elementary, Dunsmore Elementary, Toll Middle School, and Hoover High School. In fact, as recently as October 20, 2015, the GUSD Board of EducaRon meeRng agenda item "Enrollment Information" reviewed the presentaRon Rtled "Enrollment Impact Analysis" (Exhibit H). In that GUSD Board of EducaRon report, Robert McEnRre, GUSD's Chief Business and Financial Officer, who was also one of the District staff members who reviewed the peRRon as named in GUSD's Staff Report, informed the GUSD Board, "one of the things I wanted to point out, is just the number of students we're attracting on permit. In this case you can see that this year, we've attracted about 1,057 students on permit, 631 of them are out-of-district students coming in for the FLAG program or Clark Magnet (01:42:20) ... and that these programs have mitigated GUSD's declining enrollment (01:43:38)". The Rtle of the slide on display while he presented this informaRon was, "Efforts to Stabilize/Increase Enrollment". This same presentaRon included another slide Rtled, "Providing Programs that Attract/Retain Students" which demonstrates the increasing trend of out-of-district permits over Rme - from 254 permits in 2010-2011 to 631 permits in 2014-2015. A previous report presented at the August 7, 2013, GUSD Board MeeRng, Rtled *Dual Immersion Programs* (Exhibit I), contained data refleCRng the following percentages of Inter-District Permits by program: Franklin Spanish 37.08%, Franklin Italian 51.09%, Franklin French 29.17% and Franklin German 61.62%. It is clear that GUSD acRvely seeks out-of-district students to miRgate its own enrollment concerns. Therefore, GUSD's finding which frowns upon ISLA's inclusion of out-of-district families contradicts its own insRtuRonalized pracRce. Notwithstanding, should ISLA need to conduct a loTery, "children who reside within GUSD" (PeRRon, page 199) are given admissions preference as is required by EducaRon Code § 47605(d)(2)(B).

Many of the parents who signed the peRRon live on the GUSD border and are de facto parRcipants of the Glendale community. Moreover, California EducaRon Code § 47605(d)(2)(A) states "A charter school shall admit all pupils who wish to attend the school." It is imperaRve that ISLA's PeRRon be reviewed on

its merits and in accordance with State law. At the heart of the Charter Schools Act is the legislature's intent to "provide parents and pupils with expanded choices in the types of educational opportunities that are available within the public school system," and to "provide vigorous competition within the public school system to stimulate continual improvements in all public schools" (California Education Code § 47601).

- *As further evidence of the need for a second dual language immersion program, the Petition relies on enrollment trends purporting to show an increase in District elementary school enrollment and a decrease in middle and high school enrollment. Without providing supporting evidence, the Petition concludes that "a primary factor behind the increase (in enrollment) at the elementary level has been increased enrollment in the elementary school two-way dual language immersion and magnet programs," implying that the decrease in enrollment at the middle and high school level is due to a lack of choice schools at this level. (pg. 12) The enrollment trends cited within the Petition are inaccurate; thus, one of the main underpinnings of the Petitioner's understanding of the need for another dual language immersion program is fundamentally flawed and is likely to pose challenges to student recruitment.*

Response:

The noted GUSD historical enrollment trends are accurate and do indicate declining enrollment at the middle and high school level. This evidence was extracted from the California Department of Education's DataQuest for the 2009-2014 time period and is summarized in the chart titled *GUSD Enrollment by School Type* (Petitioner, page 12). FLAG programs have mitigated GUSD's declining trend, as quoted from Robert McEnroe's October 20, 2015 report on enrollment trends. This is further detailed in the previous factual finding response. The Petitioner has not implied that decreased enrollment was due to lack of choice. Rather, the data shows that school choice in the FLAG program has increased enrollment for Glendale and suggests that additional immersion choices in middle and high school may yield a similar result. The increased immersion options to middle and high school students which may be afforded by future ISLA educational programs strengthen the appeal and interest of the FLAG programs and thereby inherently also benefit Benjamin Franklin Elementary and other GUSD FLAG schools.

The need for high quality school choice options and concentrated growth in the target area are other important facts that support the need for ISLA. These are presented in the Petitioner (Petitioner, pages 10-14) and are not acknowledged in the GUSD Staff Report. A central tenant to ISLA's need analysis for more school choice is apparent in the review of data available on California Department of Education's DataQuest, which indicates that 11 out of 15 GUSD schools that are located in the target school area are in Program Improvement status. These GUSD schools in Program Improvement Status, under No Child Left Behind include: Benjamin Franklin Elementary, Columbus Elementary, Horace Mann Elementary, John Marshall Elementary, John Muir Elementary, R.D. White Elementary, Thomas Edison Elementary, Thomas Jefferson Elementary, Eleanor J. Toll Elementary, Theodore Roosevelt Middle School, and Woodrow Wilson Middle School. According to GUSD's *2014-2015 Public School Choice and Supplemental Educational Services Participation Report* (Exhibit J), 13,260 students were eligible for school choice due to their home schools being in Program Improvement Status.

- *Additionally, ISLA does not offer a high school program, nor is there any specific plan to do so expressed in the Petition, also defeating one of the main reasons identified by Petitioner for the need for another dual language immersion program and one of its key selling points to the community. Given Petitioner's stated purpose of providing a pathway to high-level language acquisition for students entering middle school and beyond, Petitioner's focus on Grades K-8 is inconsistent with this foundational purpose and also likely to affect student recruitment.*

Response:

Due to previous fuRle aT empts to collaborate with GUSD to create a middle school immersion opRon for the students enrolled in the French, German, and Italian FLAG program at Benjamin Franklin Elementary, the ISLA development team brainstormed to develop an alternate program. ISLA, by design, will provide another cohort, in addiRon to the cohort at Benjamin Franklin Elementary School, in each of the target languages that is needed to create the criRcal mass of elementary students necessary to develop a robust, viable immersion middle school program. Within a few short years, these middle school students can arRculate into a high school program, which the ISLA peRRoners are also willing to develop, as expressly stated in the PeRRon. *"Once ISLA is operational, the petitioners contemplate to further expand learning opportunities by developing a corresponding high school program (PeRRon, page 12)."* The PeRRon also addresses ISLA's plan to prepare its middle school students for immersion programs at the high school level. *"The focus of the Acquisition program is for students to enter high school bilingual and biliterate in their respective program language... (PeRRon, page 34)."* *"Immersion students successfully completing the middle school curriculum will be prepared to continue their Immersion education in high school (PeRRon, page 35)."* Since high school immersion programs in French, German, and Italian do not exist within GUSD, it is the intent of the peRRoners to subsequently expand ISLA's educaRonal program to include a high school opRon.

2. Curriculum and Instructional Materials

- *The description of the Petition's educational program incorporates references to a variety of educational philosophies and approaches, but does not clearly explain how these philosophies interrelate or cohere as one unified educational program. For example:*
 - *The International Baccalaureate ("IB") framework does not align to Common Core State Standards ("CCSS"), and the Petition does not demonstrate how the curriculum will be modified to address the conflicting standards.*

Response:

The descripRon of the educaRonal program is comprehensive. The reviewer's asserRon is predicated on a misinterpretaRon of the InternaRonal Baccalaureate ("IB") framework. The Staff Report states that *"the International Baccalaureate framework does not align to Common Core State Standards, and the Petition does not demonstrate how the curriculum will be modified to address the conflicting standards."* This asserRon is not correct. There is extensive literature on how IB and Common Core are aligned. InternaRonal Baccalaureate OrganizaRon provides an example of said literature at <http://www.ibo.org/en/about-the-ib/the-ib-by-region/ib-americas/connecting-ib-to-the-common-core/>. Alignment between the two is further supported by the 159 currently exisRng IB recognized public schools in California alone, whose educaRonal program demonstrate how IB and Common Core can and do align. ISLA is aware it cannot open as an IB recognized school. Despite anRcipaRng a delayed IB recogniRon pursuit, the PeRRon describes IB concepts integraRon and preliminary plans for implementaRon (PeRRon, pages 35-36, 76, 158, 174, 175, 203). The curriculum (PeRRon, pages 64-77) also aligns with the IB framework. The individual who will be responsible for the IB pursuit, will not be hired unRl years aBer ISLA is operaRonal. *"The proposed Charter School anticipates to employ a Director of Curriculum and Instruction no later than Year 3 of operations. This person will lead the International Baccalaureate (IB) recognition pursuit (PeRRon, page 158)."* The Director of Curriculum and InstrucRon's job descripRon is detailed in the PeRRon (PeRRon, pages 174-176) and is accounted for in the Budget (Spreadsheet Rtled, Employee Input Yr3, object 1100, Director of InstrucRon).

- o *The Petition also does not describe how the curriculum and instruction will incorporate the "10 Common Principles from the Coalition of Essential Schools" and how these principles will enhance or supplement instruction in IB and CCSS. The Petition includes a discrete description of each concept and instructional strategy but does not show how these concepts combine to create the curriculum and instructional program for ISLA.*

Response:

The reviewers misunderstand the purpose of the "10 Common Principles from the Coalition of Essential Schools." They are neither a curriculum nor instructional program. These principles are intended to characterize organizational practices which express an infrastructure for how learning best occurs and the teaching and learning environment that ISLA intends to develop and maintain (PeRRon, pages 25-27). Accordingly, the "10 Common Principles from the Coalition of Essential Schools" are also referenced in conjunction with serving educationally disadvantaged students (PeRRon, pages 39-40), workplace conditions (PeRRon, pages 160-161), and restorative justice within the student discipline policy (PeRRon, page 203).

- o *Further, there was a general perception from members of the public who spoke at the Public Hearing on November 17, 2015, and from the individuals who completed the District's online survey regarding the Petition, that the Charter School will offer an IB program. However, the budget is devoid of any items or references to IB, leaving the review team to believe Petitioners have not begun the three-year application process necessary to provide IB.*

Response:

Neither the PeRRon, nor public statements from ISLA petitioners have claimed that ISLA has begun the IB candidacy process. It is impossible for a school to apply for IB candidacy before it exists. As indicated in the previous factual finding response, ISLA's educational program is aligned with the IB framework. The individual who will be responsible for the IB pursuit will not be hired until after ISLA is operational. "The proposed Charter School anticipates to employ a Director of Curriculum and Instruction no later than Year 3 of operations. This person will lead the International Baccalaureate (IB) recognition pursuit (PeRRon, page 158)." Beyond detailing this individual's job responsibilities (PeRRon, pages 174-176), the position is accounted for in the Budget (Spreadsheet titled, Employee Input Yr3, object 1100, Director of Instruction). Dues and Memberships also increase over time in the Budget (Spreadsheet titled, Expenses Summary, object 5300, Dues and Memberships) to reflect IB candidacy and affiliation fees in year 3.

- *Implementation of these many instructional strategies, if viable, must be well supported with professional development programs. Other than vague references to the importance of professional development opportunities for its teachers, description of such programs, as well as the budget to support them, is wholly inadequate and lacking. Additionally, while the Petition briefly references onsite coaching and mentorship through its affiliation with International Studies Charter School, these opportunities are subject to the availability of adequate funds and not guaranteed.*

Response:

ISLA has accounted for an educational program well supported by professional development. The reviewers mischaracterize ISLA's ability to provide a robust professional development program. Research supporting professional development, the types of professional development, and triaging of professional development activities are described throughout the PeRRon (PeRRon, pages 38-39, 62, 81-84, 87, 106, 204). ISLA affirms that it will "promote, support and cultivate the preparation and competence of teachers through ongoing high-quality professional development (PeRRon, page 81)."

Specifically, the PeRRon describes a variety of professional development topics (PeRRon, pages 38-39, 62, 81, 87, 106, 204), include principal-led professional development needs assessments for teachers (PeRRon, pages 81, 106), coaching (PeRRon, page 82), common planning and professional learning communiRes (PeRRon, pages 82-83), mentorship and off-site professional development (PeRRon, page 83), and Summer InsRtute and Professional Growth Plans (PeRRon, pages 83-84). The budget explicitly allocates \$6,500 (Budget, object 5200) and \$10,000 (Budget, object 5210) for professional development acRviRes. AddiRon professional development funds are idenRfied in both the PeRRon and Budget. "A budget item enabling direct collaboration with the staff of both schools has been included in the 5810 line of the attached budget (PeRRon, page 10)." "Through its affiliation agreement, International Studies Charter (Florida) will also provide professional development opportunities (PeRRon, page 83)." This affiliaRon accounts for an addiRon \$32,075 (Budget, object 5810) allocated for professional development and other modeling acRviRes specific to the implementaRon of an acquisiRon and immersion program which will seek to yield high-quality curriculum and instrucRon support. ISLA emphasizes that the InternaRon Studies professional development acRviRes will be provided by one of the highest rated schools in the United States. In fact, they were recently (2015) bestowed a Blue Ribbon Award by the United State Department of EducaRon. Notwithstanding the above, the reviewer's raRonale does not account for in-house professional development. It is customary in schools to "train-the-trainer." The principal and select faculty can be trained to provide quality professional development acRviRes, ranging from instrucRonal pracRces to classroom management, and thereby yield addiRon cost savings to ISLA. Even if funds limited traveling off-site, there are a large number of free or low cost online trainings which can be incorporated into a professional development program. Lastly, there are a variety of educaRon support agencies, such as California Charter Schools AssociaRon (CCSA) and Los Angeles County Office of EducaRon (LACOE), that provide professional development opportuniRes for free or at a low cost. Professional development is sufficiently cited, thoroughly addressed, and adequately budgeted for in the PeRRon.

ISLA has also planned for staff training needs beyond the scope of curriculum and instrucRon. Academica California, the educaRon services and support provider, will coordinate regulatory compliance professional development such as mandated reporter training, OSHA compliance, and the prevenRon of workplace harassment at no addiRon cost to ISLA. Select administraRve staff will also receive training and support on school recordkeeping, student informaRon system, pupil and public records, California Longitudinal Pupil Achievement Data System (CALPADS), shotsforschools, California Basic EducaRon Data System (CBEDS), Civil Rights and Diversity Compliance (CRDC), Child NutriRon InformaRon and Payment System (CNIPS), and California State Teachers' ReRrement System (CalSTRS) (Academica California Agreement, pages 4, 7).

- *The Petition does not provide a specific description of the instructional materials it intends to use and indicates Petitioners will incorporate instructional materials already in use within the District's FLAG program and International Studies Charter School in Miami, Florida. The Petition does not include sufficient funds to purchase instructional materials, including textbooks in the five target languages (English, French, German, Italian and Spanish). The Petition does not fully explain how Petitioners plan to develop curriculum or cover the cost of said development. The cost of curriculum development for the District's high quality curriculum is approximately \$3 million dollars per year. Yet the Petition does not incorporate any financial or other type of support for continued curriculum development.*

Response:

Since ISLA seeks to model the successful educaRon programs of Benjamin Franklin Elementary School and InternaRon Studies Charter School, ISLA will uRlize the instrucRonal materials already in use at these schools. The PeRRon affirms the same. Specifically, "[t]he proposed Charter School will incorporate

instructional materials already identified and in use at Benjamin Franklin Elementary School and International Studies Charter School (PeRRon, page 77)." The PeRRon provides a sampling of these instructional materials (pages 78-80) and provides for a mechanism to regularly review and revise, as may be necessary, these identified instructional materials (page 77). ISLA will through its affiliation, also collaborate on future curriculum development needs with International Studies Charter School.

The instructional materials and corresponding budget are aligned. The reviewers' point of reference is *"the District's high quality curriculum is approximately \$3 million per year."* Dividing this allocation by the approximate number of 27,000 students GUSD serves, yields a total of \$111 per student, this number is comparable to the \$54,630 (Budget, objects 4100 and 4407) allocated for curricula for 438 students in Year 2016, which totals \$125 per student. Additionally, throughout the Staff Report, references are made to GUSD district-wide spending. This is a faulty comparison, as GUSD's calculations contemplate expenditures for curriculum and grade spans which exceed those offered by ISLA.

3. Transitional Kindergarten

- *The Petition does not include a component for transitional kindergarten, and at the Public Hearing the lead Petitioner acknowledged that ISLA did not intend to offer it as part of the proposed program. The California Department of Education ("CDE") has opined that charter schools offering kindergarten must also provide transitional kindergarten. The lack of a transitional kindergarten in the Charter School's scheme indicates a lack of awareness as to the basic legal requirements for charter schools and the curricular needs of its students.*

Response:

Although it is true that the PeRRon does not include a specific plan for a standalone transitional kindergarten it is otherwise embedded therein. The PeRRon identifies the instructional minutes for transitional kindergarten, if offered (PeRRon, page 29). The budget is also inclusive of transitional kindergarten enrollment revenues (Spreadsheet titled, LCFF Funding). The reviewers misinterpreted a lead petitioner's response to the question posed to her at the November 17, 2015 GUSD Board of Education meeting. When questioned about the transitional kindergarten plan by GUSD Board of Education Member, Nayiri Nahabedian, Lead Petitioner Gillian Bonacci explained (01:07:50) *"if we were to do a plan for transitional kindergarten, we would have to revise the petition, and we would have to have a material change, and should it come to that, we would certainly go down that road and we would have to come back to the authorizer for permission to do that."* Although GUSD inquired about a specific transitional kindergarten plan, California Education Code § 48000(e) states that *"transitional kindergarten shall not be construed as a new program or higher level of service."* If there is a demand, it is the intention of ISLA to provide transitional kindergarten in a multi-age setting as is provided for in the PeRRon (PeRRon, page 157). The California Department of Education (<http://www.cde.ca.gov/ci/gs/em/kinderfaq.asp>) website permits transitional kindergarten to be offered in a multi-age grouping setting - *"districts have flexibility to determine how best to meet the curricular needs of each child."* Research indicates that multi-age grouping promotes cognitive and social growth, reduces antisocial behavior, and facilitates the use of research-based, developmentally appropriate instructional practices such as active learning and integrated curriculum (Gaustad, 1997). California Education Code § 48000(e) describes transitional kindergarten as *"the first year of a two-year kindergarten program that uses modified kindergarten curriculum and that is age and developmentally appropriate."* This instructional approach aligns to differentiated instruction also addressed in the PeRRon (PeRRon, pages 36, 39, 46, 67).

4. Staffing

- *The staffing provided in the first year of ISLA's operation is inadequate to support the educational program proposed by the Petition. Within the first year, the Charter School intends to employ 19 general education teachers, one Lead Teacher, and one special education teacher, for a total of 21 teachers for a projected enrollment of 438 students. Based upon the Charter School's proposed student enrollment per grade level (pg. 16), in order to provide substantive instruction in four target languages in kindergarten through fifth grade, the Charter School would need to employ at least 16 teachers with multiple subject credentials. The Petition proposes a block schedule for students in grades 6-8, which would require an additional 13-15 teachers at the middle school level to ensure all core subjects, physical education, identified electives, and foreign language instruction are provided. In addition to a transitional kindergarten teacher and an additional special education teacher, both of which are necessary given the target student population (but neither of which are accounted for in the Petition), at least 33-35 teachers are required for adequate implementation of the Charter School's program. As the Petition identifies a need for only 21 teachers, the proposed program is understaffed by approximately 12-14 teachers.*

Response:

As noted in a previous factual finding response, the PeRRon states that the year one staffing plan may include mulRage grouping teaching assignments. "Since enrollment may be imbalanced in different grades, multiage grouping, such as a fourth and fifth grade class combined, may occur to enable ISLA to adequately staff while still operating within the budget" (PeRRon, page 157). The number of 33-35 teachers suggested by the reviewers for ISLA's first year of operaRon is a gross over-calculaRon and does not reflect the actual needs of the school. Beyond mulRage grouping, the PeRRon considers other efficient assignment strategies such as Strategic IntervenRons (PeRRon, page 40). Since mulRple subject credenRaled teachers are authorized to teach at the middle school level, one teacher is able to teach more than one subject in the upper grades. Departmentalizing in a cored seUng , such as math and science, is common within small middle school programs. This is an important staffing consideraRon for the first few years unRI the teacher workforce evolves into a more single subject credenRal dominant teaching staff. ISLA is also able to employ mulRple part-Rme single subject credenRaled teachers to address specific programming needs should the needed subject maT er experts not be mulRple subject credenRaled. An exact distribuRon of teachers and corresponding assignments cannot be finalized unRI ISLA has enrollment. "Staffing will be proportionate to the student enrollment and aligned to budgetary allocations" (PeRRon, page 158). To provide support with staffing, ISLA will addiRonally avail itself to internship programs as described in the PeRRon (PeRRon, page 157). With an expected iniRal enrollment of 438 and 19 classroom teachers, ISLA anRcipates a teacher to student raRo of 1:23. ISLA's total educaRon and staffing plans are comprehensive and adequate to execute the educaRonal program.

5. Plan for Serving English Learners.

- *Little mention is made of the Charter School's plan for serving English Language Learners ("ELL"), apart from what appears to be boilerplate language taken from CDE's general guidelines for serving these students. Further, the Petition does not include curriculum and materials intended for implementation for Program 1 and Program 2 ELL students or an analysis of how this instruction will be modified or enhanced by the Coalition of Essential Schools 10 Guiding Principles and other standards.*

Response:

ISLA's program is intentionally designed to meet the needs of all learners, especially English language learners. Ample research is cited on the benefits of immersion program for English learners. A Stanford study concluded (PeRRon, page 24), *"those in the two-language programs catch up to or even surpass their counterparts by middle school." Therefore, dual language instruction also benefits the English language learner whose primary language is in another world language.* At the very heart of reaching English learners is the mission of ISLA - *"The mission of ISLA is to ensure high-level academics in core subjects and language acquisition for all students regardless of their socio-economic status or English language proficiency to promote global competence, college preparedness, and career readiness"* (PeRRon, page 3). The reviewers negatively characterize ISLA's intent to follow the guidance of the California Department of Education with regard to serving English language learners. ISLA fully intends to support English Language Learners and has provided a number of references to serving English language learners throughout the peRRon, but are primarily found on pages 47-52. The proposed master schedule for grades K-5 (PeRRon, page 42) explicitly promotes, through strategic regrouping, English and target language proficiency for all students to improve learner academic outcomes. *Additional push-in and pull-out support is provided as needed to ensure English language learners have equal footing with native speakers across the curriculum . . . These students receive individual, small group intervention, and/or targeted tutoring support"* (PeRRon, page 51). Additional services for English language learners in the middle school are provided through *"strategic English Language Development (ELD) class during the regular instructional day and / or beyond the school day"* (PeRRon, page 51). In addition to the curriculum and standards-aligned texts, English language learners will be provided reading intervention to help students achieve rapid improvement in literacy skills and advance their reading ability to grade-level proficiency. Reading intervention will *"focus on improving development, in particular, reading comprehension, fluency, phonemic awareness, phonics, and vocabulary development"* (PeRRon, page 51). English language learners will access standards-aligned curriculum, taught by teachers who have English learner authorization and who throughout their classes incorporate Specifically Designed Academic Instruction in English (SDAIE) strategies (PeRRon, pages 68, 83, 84, 174). Element 2, Measurable Pupil Outcomes, which is a precursor to ISLA's Local Control Accountability Plan (LCAP), additionally identifies actions and outcomes specific to English language learners (PeRRon, pages 88, 89, 92-94, 96, 100, 101). ISLA recognizes that California recently approved new ELD standards and identified corresponding curriculum for the implementation of these standards. The ISLA principal and faculty will collaborate with International Studies Charter School, in the determination and selection of corresponding curricula.

6. Plan for Serving Students with Disabilities

- *ISLA reserves the right to become an independent local educational agency ("LEA") and join a SELPA (pg. 53) and states its intention to apply to become an LEA member of the El Dorado County Office of Education SELPA. However, it does not appear ISLA has begun the application to become a LEA member of El Dorado SELPA, a process with a substantial (sometimes multi-year) lead time. The Petition also indicates it will operate as a "public school of the District" in accordance with Education Code section 47641(b), which is directly in conflict with its intention to function as an independent LEA, and leaves the District guessing as to the plan ISLA has for serving students with disabilities. Operating as its own LEA member of a SELPA versus operating as a school of the district are two completely different standards and methods for ensuring that the needs of disabled students are addressed, with different liability outcomes, roles and responsibilities for both the District and the proposed Charter School.*

Response:

The reviewers indicate that ISLA has not *“begun the application to become an LEA member of EL Dorado SELPA, a process with a substantial (sometimes multi-year) lead time.”* Not only has ISLA completed the application and is awaiting a capacity interview for admission into El Dorado SELPA, but ISLA has been informed by EL Dorado SELPA that they had already notified GUSD that the ISLA application had been received prior to the release of the Staff Report (Exhibit K). ISLA's pursuit to become a member of the El Dorado SELPA is in process and in accordance with their timeline. Notwithstanding, since admission is not guaranteed, ISLA has also begun pursuing admission into LACOE's SELPA. Since ISLA anticipated opportunities for collaboration with GUSD, ISLA provided language in the Petition regarding its operation as a *“public school of the District”* in accordance with Education Code § 47641(b). In spite of the Petition providing an alternate SELPA pursuit with the conditional word *“if”* - *“If the proposed Charter School operates as an LEA...”* (Petition, page 53) and *“If the proposed Charter School operates as a public school of the District...”* (Petition, page 53) - the reviewers interpreted alternate pursuits as ISLA simultaneously operating as both its own LEA and as a public school of this District. This is a wholly false interpretation. Moreover, the process for acceptance to the El Dorado Charter SELPA is not a year-long process. The application was due December 2, 2015. ISLA filed an application in the first application window for 2016-17. A decision by El Dorado Charter SELPA is expected to be rendered by the end of January 2016.

- *The Petition evidences Petitioners' lack of understanding of the federal and state legal responsibilities involved in serving individuals with exceptional needs and how the Charter School will meet those responsibilities. The Petition assumes that students are only referred for special education if they do not first appropriately respond to ISLA's Response to Instruction and Intervention process. (pg. 55) The Petition does not account for those students who might require a referral earlier on in the intervention process. This requirement to exhaust all options in the general education program before a referral for special education is made is in direct contravention of the law which requires a referral for special education and services after the resources of the general education program have been considered, and where appropriate, utilized.*

Response:

The Petition (Petition, page 1) assures that *“The proposed Charter School shall adhere to all provisions of Federal law related to students with disabilities including, but not limited to, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990 and the Individuals with Disabilities in Education Improvement Act of 2004.”* The Petition (Petition, page 54) further identifies the process for meeting these requirements and states that *“The proposed Charter School will ensure that students with disabilities are identified in accordance with the policies and procedures of the SELPA. In order to comply with Child Find requirements as specified by law, the proposed Charter School will establish a referral and assessment process that brings together the parent/guardian, student, and school personnel to address any problems that interfere with a student's success at the school. This process will entail search and serve, Response to Instruction and Intervention, referral, assessment, and IEP review.”* The Petition identifies Response to Instruction and Intervention (RtI2) as the general process for pupils not adequately responding to academic or behavioral expectations (Petition, pages 33, 39, 43-44, 45, 54-55, 204). However, RtI2 is not the only mechanism, identified in the Petition, which may lead to assessment. *“The parent of any student needing or qualifying for special education services may also request a referral for an evaluation”* (Petition, page 55). Therefore, ISLA's use of RtI2 does not preclude a student from being able to access services in an alternate process.

- *The Charter School intends to employ one full-time teacher possessing a special education credential and only intends to employ a special education coordinator pending budgetary availability. (pg. 59) Despite intending to serve a population representative of the District,*

namely Franklin Elementary, the Petition overlooks the needs of the students with disabilities represented within the District and the special education and designated instructional services necessary to meet those needs, including but not limited to, speech and language therapy, low incidence services, behavioral support, mental health services, and occupational therapy, among others. It appears Petitioners are not prepared to make available the continuum of options as required by federal and state law.

Response:

The Budget (Spreadsheet Rtled, Employee Input Yr1, object 1100) fully funds two special education teacher professionals who can manage caseloads up to 56 students (28 each) that would support a special education population of over 12%. The reviewers mischaracterize the Petitioner's statements. The Petitioners are fully aware that despite already having enough meaningfully interested parents to open ISLA at the projected enrollment assumptions, there are always possibilities that many of those students may not materialize. The Petitioner's comments were intended to align with a later discussed staffing detail "staffing will be proportionate to the student enrollment and aligned to budgetary allocations" (Petitioner, page 158).

The reviewers indicate that the Petitioner overlooks special education and designated instructional services, such as "speech and language therapy, low incidence services, behavioral support, mental health services, and occupational therapy, among others." As detailed throughout the Petitioner (Petitioner, pages 52-64), ISLA supports students inclusively by complying with applicable State and Federal laws that serve students with disabilities (Petitioner, page 52) to provide the continuum of services is required by law and pursuant to a pupil's Individualized Education Plan (IEP). Additional services for special education students will be provided for by contracted parties such as Total Education Solutions (TES) or PRN (Budget, object 7010). Additionally, joining a SELPA such as El Dorado, provides ISLA with additional support to meet the needs of all students with IEPs and with an increased ability to make available a continuum of options.-

The special education rate was calculated based on the average special education rate of the schools located in the target community. As indicated in the demographic information in the Petitioner (Petitioner, pages 16-17, 40), the referenced average special education rate of the targeted community is 8%. The special education allotment in the budget coincides with budget models for other Academic clients. Notwithstanding the above, ISLA maintains that "Staffing will be proportionate to the student enrollment and aligned to budgetary allocations" (Petitioner, page 158).

Element 2 – Measurable Student Outcomes Identified for Use by the School; and #
Element 3 - Method by Which Progress towards Outcomes is Measured #

The Statute and Regulations provide for a charter petition to identify the specific skills, knowledge and attitudes that reflect the school's educational objectives and that can be assessed frequently and sufficiently by objective means to determine satisfactory progress and provide for the frequency of the objective means for measuring outcomes to vary by factors such as grade level, subject matter, and previous outcomes. The pupil outcomes shall align with state priorities. (Ed. Code, § 47605(b)(5)(B); Regulations, §11967.5.1(f)(2).) To be sufficiently detailed, objective means of measuring pupil outcomes must be capable of being used readily to evaluate the effectiveness of and to modify instruction for individual students and for groups of students during the school year. (Regulations, § 119675.1(f)(2)(A).)

The Petition does not contain a sufficient description of measurable student outcomes and the method by which those outcomes are measured, based on the following findings:

1. Outcomes Vague. *The majority of the outcomes described are vague, impractical and not measurable. For example, several of the outcomes are simply "strive to maintain baseline." (pg. 88) This does not provide the District with adequate information to determine whether progress toward that outcome was achieved.*

Response:

The reviewers assert that *"the majority of the outcomes described are vague, impractical, and not measurable"*, but fail to identify any information regarding which outcomes are problematic, except for one example cited on page 88 of the Petition. Therein, the Petition confirms how ISLA plans to meet State Priority 1 (Teacher Assignments and Credentialing) under California Education Code § 52060. In this section, ISLA describes annual actions that include: a thorough review of teacher qualifications, screening for a valid California teaching credential, as well as a Bilingual, Crosscultural, Language and Academic Development (BCLAD) and or Cross-cultural language and Academic Development (CLAD) authorization relevant to the assignment; quarterly reviews of credential status held to check for expirations; and annual evaluations and informal reviews administered to identify areas of growth for teachers. ISLA then further identifies two measurable goals. ISLA provides a baseline goal in year 1 (2016-17) of having 100% of teachers holding appropriate credentials for their assignment and then states that ISLA will strive to maintain that baseline for the remaining four years of the charter. ISLA also identifies in that section that 100% of teachers evaluations will occur, using the California Standards for the Teaching Profession (CSTP) to monitor teacher effectiveness and identify areas for growth. Additionally stated is that ISLA will strive to maintain the baseline of 100% completion of teacher evaluations and growth plans, with a minimum of one informal and one formal evaluation per year. It is unclear how this is vague. If ISLA asserts its intention to achieve 100% compliance, the only intended outcome that makes sense for the following years is one that strives to maintain that baseline.

2. Inconsistencies in Petition. *Several of the outcomes are not consistent with the program plan and expectations outlined elsewhere within the Petition. For example, the annual measurable outcome for English Language Learners is "reclassification at a rate that meets or exceeds comparable school reclassification rates by the third year of enrollment (pg. 93); however, reclassification is projected to occur within 5-7 years of enrollment elsewhere within the Petition. (pg. 51)*

Response:

Despite indicating *"several outcomes are not consistent with the program plan and expectations outlined elsewhere,"* the reviewers only identify a singular alleged inconsistency and inaccurately characterize this information stated within the Petition. This section of Petition, requires school wide goals that will meet the eight state priorities, as defined by California Education Code § 52060. As noted by the reviewers, one of ISLA's stated outcomes seeks to achieve English language learner *"reclassification at a rate that meets or exceeds comparable school reclassification rates by the third year of enrollment"* (Petition, page 93). Earlier in the Petition, ISLA describes a framework to evaluate the English learner program (Petition, page 51-52) as is required by 20 U.S.C. § 6841(b)(2). ISLA has simply set its schoolwide reclassification goals with the intention to mitigate any student becoming classified as a long-term English learner (LTEL). California Education Code § 313.1(a), states that the term LTEL means an *"English learner who ... has been enrolled in schools in the United States for more than six years [and] has remained at the same English language proficiency level for two or more consecutive years."* The reviewers confuse ISLA's goal for meeting a state priority to achieve English language learner reclassification in three years (Petition, page 93), with the timeline to avoid potential LTEL classification, which may indicate program inadequacies. There is no inconsistency but a misreading of the Petition.

3. Outcomes Impractical. Finally, some of the measurable outcomes are impractical based upon the educational program proposed. For example, the student achievement pupil outcome indicates achievement of grade level proficiency in the target language within three years of enrollment within the program. It is not clear how students within the Acquisition track will attain this goal since they are only receiving instruction in the target language every other day pursuant to the proposed block schedule in middle school.

Response:

Following the pattern of former findings, the reviewers indicate that "some of the measurable outcomes are impractical" but only identify one. Specifically, the reviewers allege that middle school students enrolled in the acquisition program cannot achieve target language fluency by grade 9. As noted in a previous factual finding response, ISLA will be modeling the successful middle school acquisition program from the International Studies Charter School's middle school program. International Studies Charter School students who complete the middle school program achieve over a 90% passage rate on their first attempt of the corresponding AP world language test in ninth grade. This translates into college level target language literacy by ninth grade. Moreover, the proposed block schedule (PerRon, page 31) and calendar (PerRon, page 28) for ISLA provides for 190 days of instruction, 10 more days than GUSD's schedule. This comment also demonstrates the reviewers lack of understanding of how block schedules work. Students do not receive less language instruction but instead meet for longer blocks of instruction every other day. With longer blocks for instruction, teachers have more time to complete lesson plans and to examine and re-evaluate practices. More class time is available to develop key concepts, incorporate creativity into instruction, and try a variety of classroom activities that address different learning styles. Longer time blocks allow for in-depth study, such as individual student projects, peer collaboration, and one-on-one work between teachers and students (O'Neil, 1995; Eineder & Bishop, 1997). In a block setting, students also gain more time to internalize a world language during longer periods.

Taken together, these deficiencies give staff little confidence that Petitioners have the requisite level of instructional expertise necessary to run the program described.

Element 4 – Governance

The Statute and Regulations provide for a charter petition to identify the governance structure including, at a minimum, evidence of the charter school's incorporation as a non-profit public benefit corporation, if applicable, the organizational and technical designs to reflect a seriousness of purpose to ensure that the school will become and remain a viable enterprise, there will be active and effective representation of interested parties, and the educational program will be successful. (Ed. Code, § 47605(b)(5)(D); Regulations, §11967.5.1(f)(4).) The Statute and Regulations also require evidence that parental involvement is encouraged in various ways. (Ibid.)

The Petition does not contain a sufficient description of the Charter School's governance structure based on the following findings:

Response: "

The reviewers' assertions appear to be standard boilerplate for a charter petition denial and not based on an actual review of ISLA's petition. "

1. Lack of Leadership Information. The Charter School is proposed to be run by a nonprofit corporation, the Board of Directors of which may be comprised of anywhere from 3 to 20 members. While several

people were introduced at the public hearing as ISLA Board Members, this came as a surprise, as no members of the Board are identified in the Petition. In general, the Petition is devoid of the identities of (a) persons leading the Petition effort; (b) persons who would lead/direct the school itself; and (c) persons who currently serve or are proposed to serve on its Board of Directors. Therefore, any assessment of the expertise, past history of success, and experience of the school's leadership structure is impossible.

Response:

There is no requirement for the Governing Board to be formed at the time a PeRRon is submitted. Notwithstanding, the ISLA Board has since formed. During the PeRRon review process, Dr. Kelly King, GUSD's Assistant Superintendent, Educational Services, who was also one of the District staff members who reviewed the peRRon as named in the Staff Report, contacted the lead peRRoners for confirmation of who is on the Board. ISLA promptly confirmed the requested information to Dr. King via electronic mail on October 14, 2015 (Exhibit L). Brief biographies on all persons involved in the founding of ISLA are provided in the PeRRon (PeRRon, pages 5-10). These individuals include those who are now serving on the ISLA Governing Board. Lead peRRoners, Gillian Bonacci and Hilary Stern met with staff in person on two separate occasions and had several subsequent digital communications with GUSD staff to garner clarification on GUSD's Board Policy (BP) 0420.4 and Administrative Regulation (AR) 0420.4 (Exhibit 1) prior to submission of the PeRRon. In fact, it was these pre-PeRRon submission meetings that led to the revision of the corresponding GUSD BP and AR. Both reflect revision dates in August 2015. The identities of the ISLA lead peRRoners were absolutely known to staff.

2. Inconsistent Governing Documents. A search for ISLA on the CA Secretary of State's business portal reveals that ISLA was officially incorporated as a California nonprofit public benefit corporation, yet only draft documents were provided with the Petition. Further, the draft Bylaws and the Petition are inconsistent with each other regarding compliance of the Board of Directors with the Brown Act; the Petition specifies that the Brown Act meeting notice requirements will be met, but the Bylaws contain operational provisions that are completely at odds with Brown Act compliance. Neither the Petition nor the Bylaws specify where the ISLA Board of Directors will meet, and whether the meetings are proposed to occur in District boundaries. A failure to meet in District boundaries acts as an impediment to parent participation and local community participation in government, and hampers the ability of the District to meet oversight obligations.

Response: "

The certified Articles of Incorporation were not yet available at the time the PeRRon was submitted to GUSD, as they were pending State review. ISLA provided GUSD in the PeRRon (PeRRon, pages 115-116) with a copy of what was concurrently being filed with the California Secretary of State. GUSD asserts that there is an inconsistency with Brown Act and the Bylaws. Although the Bylaws do not specifically indicate that the ISLA Board will meet in Glendale, they don't indicate otherwise. The PeRRon (PeRRon, pages 2, 112, 130) assures that ISLA will follow the requirements set forth within the Brown Act. It is impractical to enumerate all of the provisions of the Brown Act in the ISLA PeRRon. "

3. Conflict Policies. Similarly, the Petition verbiage states that ISLA and the Board of Directors will comply with conflict of interest laws, including the self-dealing prohibitions of Government Code 1090, but its proposed Conflict Code does not reference Government Code 1090 compliance. In addition, the Conflict Code lists designated employee positions that do not correspond to the staffing plans in the Petition or the budget (e.g., they refer to an Executive Director, Chief Business Officer, Director Personnel Services, and others). This lack of congruence between the Petition and the proposed operational policies leads the Staff Team to question whether the Petitioner's fully comprehend these types of transparency and public accountability laws.

Response:

ISLA “will comply with the Political Reform Act (Government Code § 87100 et seq.), Government Code 1090, and other applicable laws regarding conflicts of interest” (PeRRon, page 130). Moreover, as alluded by the reviewers, ISLA has provided a draB Conflict of Interest Code (PeRRon, pages 131-134). Although it is true that some of the posiRons idenRfied in the Conflict of Interest Code are not otherwise idenRfied in the staffing plan or the budget, the ISLA Board has the foresight to anRcipate creaRng these posiRons once economies of scale have been reached. The staffing plan does not include them now because ISLA’s iniRral size will not merit the need for these posiRons nor is the iniRral budget able to sustain them.

Element 5 – Employee Qualifications

The Statute requires the Petition to describe the qualifications to be met by individuals employed by the Charter School. (Ed. Code, § 47605(b)(5)(E).) The Regulations that the qualifications should, at a minimum, identify general qualifications for the various categories of employees; ensure the health and safety of the school’s faculty, staff, and students, and the academic success of the students; identify the key positions in each category and specify the additional qualifications expected for those positions; and specify applicable legal requirements will be met, including but not limited to credentials as necessary. (Regulations, § 11967.5(f)(5).)

The Petition fails to reasonably comprehensively describe this element, as follows:

1. Teacher Salaries. The Petition identifies the responsibilities and qualifications of teachers in general, and also indicates its intention to pay salaries commensurate with their experience and comparable to the District. The proposed budget indicates that these teachers will be paid a salary of \$48,500 in the first year. The average new teacher hired by the District has approximately eight years of experience, a Bachelor’s degree + 42 units which equates to a starting salary of approximately \$62,433 for the 2016/2017 school year. The Petition proposes a salary 29% less than the District’s and 44% less than the District’s for total compensation, combining salary and benefits, and does not account for the District’s stipend for dual immersion teachers. This is not competitive, nor is it a reasonable rate of compensation for the demands described for teachers in the Petition. The benefits budgeted by the Charter School are also far less than competitive and far below what the local teachers currently receive.

Response:

The Staff Report states that teacher salaries are inadequate. However, complete benefit and salary informaRon is provided and acknowledged in the Staff Report. It is well-established in the Charter Schools Act of 1992, that “it is the intent of the Legislature, in enacting [the Act], to provide opportunities for teachers, parents, pupils and community members to establish and maintain schools that operate independently from the existing school district structure.” Staff further assert that “new teachers will likely lack a depth of dual language experience necessary to successfully implement an effective instructional program.” The Staff Report does not provide evidence demonstraRng success rate, but rather an average salary of all teachers in the district, not FLAG teachers. This is noteworthy because Benjamin Franklin Elementary teachers are, according to the California Department of EducaRon’s 2014-2015 DataQuest *Certificated Staff Experience Reports 2009-2010 through 2014-15*, the least experienced of all elementary, middle, and high school GUSD teachers. Despite the reviewers implicaRons, Benjamin Franklin Elementary teachers do successfully implement an effecRve instrucRonal program as evidenced by the increased student achievement at Benjamin Franklin Elementary. GUSD’s asserRon is not reflecRve of its own successful models. The reviewers’ conclusions are not based on fact.

The average teacher salary was based upon a review of salary tables from Glendale Unified School District, Burbank Unified School District, and Pasadena Unified School District. These three salary tables

are located at the links below and are also provided as Exhibits M, N, and O. The average teacher salary included in the budget is a near value to those for the three comparable districts for teachers who are within the first few years of the profession. The PeRRoners understand the value of compereRRve compensaRon and demonstrate the same in the PeRRon. *"As the Charter School matures, teacher and staff salaries and benefits will increase (PeRRon, page 160)."* The PeRRoners anRcipate addiRon revenues not accounted for in the submiT ed budget. Should these revenues materialize, it is the intent of the PeRRoners to revisit teacher salary tables and where financially plausible either offer general increases, one-Rme salary increases, or end-of-year bonuses. Tangible compensaRon is not the only reason teachers or other staff seek employ. *"Teacher and staff input will be valued as this is a core component of job satisfaction. Accordingly, they will be provided opportunities for shared decision making with the proposed Charter School principal (see Element 1, "How Learning Best Occurs, Coalition of Essential Schools' 10 Common Principles Principle 3, Personalization, and Principle 7, Tone of Decency and Trust) (PeRRon, pages 160-1)."* The scope of budgeted benefits are comparable to those provided by GUSD and include paid medical, dental, life, short-term disability, and CalSTRS (for eligible members).

Glendale Unified Teacher Salary Schedule

<http://www.gusd.net/cms/lib03/CA01000648/Centricity/Domain/50/Appendix%20B%202014.pdf>

Burbank Unified Teacher Salary Schedule

<http://www.burbankusd.org/files/user/109/file/A-1.pdf>

Pasadena Unified Teacher Salary Schedule

http://www.pusd.us/files/_BOJr_/bf0491c93df897b83745a49013852ec4/CERTIFICATED_SALARY_SCHEDULE_C-1_10_MONTHS_PAID_OVER_11_MONTHS.pdf

2. Teacher Recruitment. Petitioners do not appear to recognize the difficulties in recruiting teachers with the specialized credentials requisite for a dual language immersion program. When recruiting foreign teachers possessing a sojourn certificated employee credential, the teacher's total compensation must meet or exceed the compensation they received in their home country. As the District has experienced, teachers holding a sojourn credential typically cost more than the average District teacher, and significantly more than new hires. The Petition does not adequately account for this added expense. If Petitioner plans to hire an entire teaching staff with no teaching experience in order to achieve the lowest possible compensation, these new teachers will likely lack a depth of dual language experience necessary to successfully implement an effective instructional program.

Response:

The PeRRon includes a reasonably comprehensive mulRtude of acRviRes and avenues available for recruiRng domesRc and foreign teachers under Recruitment (PeRRon, pages 158-160), including but not limited to, collaboraRng with world-language-teacher organizaRons across the state and naRon, collaboraRng with J-1 Visa Designated Sponsor OrganizaRons to idenRfy potenRal faculty overseas, collaboraRng with InsRtuRons of Higher EducaRon (IHE) which have California Commission on Teacher CredenRaling approved bilingual authorizaRon programs, Language Other Than English (LOTE) credenRaling programs and offer degrees in the target languages (PeRRon, page 154) and many other avenues that GUSD themselves do not currently avail themselves of. Some of these programs, like the VisiRng Teacher Program, sponsored by Spain's Ministry of EducaRon, fund many of the associated recruitment costs. Since the California Department of EducaRon sponsors the subsequently issued J-1 visas, there remain no costs whatsoever to ISLA to parRcipate in this foreign teacher recruitment which alone can yield teachers fluent in any combinaRon of all four target languages. In addiRon, ISLA has already developed a database of over 90 teachers that have expressed interest in becoming an ISLA teacher. Moreover, ISLA has set-up an account with Edjoin to recruit for all staffing needs. In addiRon to allocaRng \$5,000 to recruiRng teachers and students in the budget (Budget, object 5815), human resource support is also provided for by Academica California in their agreement (Academica agreement,

page 4, item 7). Lastly, the reviewers assert that teachers possessing a sojourn credential must be compensated at a higher rate than their teacher compensation in their home country. The California Commission on Teacher Credentialing details the *Sojourn Certificated Employee Credential* on a leaflet titled the same (CL-568). This leaflet, which is included as Exhibit P, has no such compensation requirements. Even if it did, teachers from the countries in which ISLA may recruit customarily earn less and have higher unemployment rates. Exhibits Q, R, and S demonstrate the teacher salary tables of the governments of France, Italy, and Spain. Although the Germany salary table was not readily available, the abundance of evidence suggests the teacher salaries would also be lower than ISLA's proposed salary schedule. For currency conversion reference purposes, the Euro is currently almost on par with the US dollar. The ability of early service teachers to effectively implement an immersion program is detailed in the preceding factual finding response.

3. Instructional Aides. The Petition identifies instructional aides who will provide instructional support and assistance to teachers and other certificated personnel. (pg. 170) However, the experience and qualifications for instructional aides within the Petition does not require the aides to be fluent in any of the target languages proposed by the educational program. It is unclear how the instructional aides will provide instructional assistance and support within the classroom if they do not speak the target language.

Response:

The instructional aides are allocated to the special education program in the initial years. It is programatically more appropriate to the performers that these instructional aides provide support in English. As ISLA matures, instructional aides and interns will provide additional service within each of the four target languages.

4. Attendance Accounting. No position is identified to include daily student attendance accounting, maintenance of CALPADs data, and identification of all EL students. These tracking and monitoring duties are critical for school funding and reporting and are a serious oversight.

Response:

ISLA has already contemplated these functions. The Office Manager will oversee daily attendance accounting. Academica California, ISLA's educational services and support provider will "provide support to designated School staff and coordinate data reporting to California Longitudinal Pupil Achievement Data System (CALPADS), *shotsforschools*, California Basic Educational Data System (CBEDS), Civil Rights and Diversity Compliance (CRDC), Child Nutrition Information and Payment System (CNIPS), and California State Teachers' Retirement System (CalSTRS)" (Academica Agreement, page 4). Such administrative services are also affirmed in the Petition (Petition, page 232).

A teacher will receive a stipend to be the English Language Learner Coordinator. This individual will be responsible for the identification, designation, notification, progress monitoring, and reclassification of English learners as well as the ELL Program Assessment and English Learner Advisory Committee as is described in the Petition (Petition, pages 47-52).

5. Office Manager. The employment description for Office Manager includes an education requirement of a high school diploma, yet the duties include items normally associated with a credentialed ASB advisor, an accountant, an auditor, accounts payable, payroll, and food services administration. As described in the Petition, this position requires too many duties and skills to assume the job can be adequately staffed by a single individual.

Response:

The Office Manager will not assume all of these duties on his or her own. The Office Manager will delegate, as may be necessary from time to time, some of these responsibilities to the Receptionist (Budget, object 2900). Moreover, the Office Manager will have the support of Academia California as detailed in the Academia California Agreement (Academia Agreement, pages 3, 4).

Element 6 – Health and Safety

The Statute requires the Petition to identify the procedures that the Charter School will follow to ensure the health and safety of students and staff. (Ed. Code, § 47605(b)(5)(F).) The Regulations provide the procedures should, at a minimum, require that each employee of the school provide a criminal records summary as described in Education Code section 44237, include the examination of faculty and staff for tuberculosis as described in Education Code section 49406, require immunization of students as a condition of school attendance to the same extent as would apply if the students attended a non-charter public school, and provide for the screening of students' vision and hearing and the screening of students for scoliosis to the same extent as would be required if the students attended a non-charter public school. (Regulations, § 11967.5(f)(6).)

The Petition does not contain sufficient description of the Charter School's health and safety procedures based on the following findings:

1. Fingerprinting/Background Check. The Petition's policies for the fingerprinting and background checks of volunteer workers does not adequately account for the safety of Charter school students. The Petition indicates it will comply with Education Code requirements for the fingerprinting and background clearance of Charter School employees and volunteers. However, the policies deviate from the Education Code by allowing volunteers to perform services that are not under the direct supervision of a proposed Charter School employee.

Response:

The reviewers mischaracterize the noted fingerprinting guidelines. The reviewers assert that "the policies deviate from the Education Code by allowing volunteers to perform services that are not under the direct supervision of a proposed Charter School employee." It appears that the reviewers are alluding to California Education Code § 35021 which states "any person...may be permitted...to serve as a nonteaching volunteer aide under the immediate supervision and direction of the certificated personnel of the district to perform noninstructional work which serves to assist the certificated personnel in performance of teaching and administrative responsibilities." However, the clause in question is in accordance with California Education Code § 49024(a), which identifies instances in which volunteers are not explicitly required to perform services under the direct supervision of another employee. "Prior to assuming a paid or volunteer position to work with pupils in a pupil activity program...candidates shall obtain an Activity Supervisor Clearance Certificate from the Commission on Teacher Credentialing..." California Education Code § 49024(b) specifies that pupil activity programs include: "scholastic programs, interscholastic programs, and extracurricular activities ... including, but not limited to, cheer team, drill team, dance team, and marching band." Moreover, effective July 1, 2010, AB 1025 requires noncertificated individuals, prior to starting a position supervising, directing, or coaching a student activity program, to obtain from the Commission on Teacher Credentialing an Activity Supervisor Clearance Certificate (ASCC). These types of volunteers cannot possess an ASCC without Department of Justice fingerprinting clearance. In the alternative of obtaining an ASCC, California Commission on Teacher Credentialing, Coded Correspondence 10-11, dated July 20, 2010, "Provides that there are two options to meet the fingerprinting requirement prior to working with pupils in a paid or volunteer activity: A) Department of Justice and Federal Bureau of Investigation criminal history review required by the school district OR B) Obtain an ASCC from the Commission."

2. *Vision, Hearing and Scoliosis Screening.* The Petition states students will be screened for vision, hearing and scoliosis (pg. 183); however there is no indication as to who is intended to provide the screenings, such as a school nurse, nor is a properly credentialed screener budgeted.

Response:

It is not required for a peRRoner to know prior to opening a school who will be providing these screenings. Since assurances were made in the PeRRon (PeRRon, page 183) that ISLA would follow California EducaRon Code § 49450, it stands to reason that this service would be delegated to a qualified screener, such as Total EducaRon Services (TES) or PRN ConsulRng, which are well-known nursing services providers. Such services are contemplated in the Budget (Budget, object 5800). Lastly, *Standards for Scoliosis Screening in California Public Schools* (California Department of EducaRon, Sacramento, 2007) provides for a reimbursement mechanism for scoliosis costs. "In accordance with the provisions of the Government Code, Section 17561, school districts are authorized to file claims with the State of California for costs incurred as the result of a mandate. School districts will be reimbursed for costs associated with screening, recordkeeping, referral, follow-up, and administration of the scoliosis screening program."

3. *Medication in School.* Despite stating a willingness to adhere to Education Code section 49423 regarding the administration of medication in the school, the Petition's policies pertaining to the administration of medication do not align with the relevant Education Code sections, which require the medication to be accompanied by a statement from the prescribing physician describing the name of the medication, method, amount and time schedules by which the medication is to be taken. Additionally, the budget does not provide for the necessary nurse (or health clerk) to dispense medications.

Response:

The peRRoners disagree with the reviewers asserRon that the PeRRon's policies pertaining to the administraRon of medicaRon do not align with California EducaRon Code § 49423. This code states, "any student who is required to take, during the regular school day, medication prescribed for him by a physician, may be assisted by the school nurse or other designated school personnel if the school district receives (1) a written statement from such physician detailing the method, amount, and time schedules by which such medication is to be taken and (2) a written statement from the parent or guardian of the student indicating the desire that the school district assist the student in the matters set forth in the physician's statement." The law mirrors the peRRoner's policy (PeRRon, page 183) which states "parents must bring prescribed medication(s) to the office in the original container, with the name of the prescribing physician, the name of the student, and dispensing instructions." Dispensing instrucRons encompass the "method, amount, and time schedules" as set forth by the physician as such instrucRons can only be authorized by the physician. Furthermore, the peRRoner's policies require that "parents will complete the appropriate form authorizing the proposed Charter School staff to administer medication(s)" (PeRRon, page 183). By compleRng the required form, the parent or guardian effecRvely indicates to the school their desire that the school assist the student "in the matters set forth in the physician's statement" (California EducaRon Code § 49423). The fully implemented medicaRon administraRon process will be developed in accordance with the *Program Advisory on Medication Administration* (California Department of EducaRon, Sacramento, 2007) and will incorporate other California Department of EducaRon guidance and best pracRces such as *Emergency Anti-Seizure Medication Administration*, *Medication Administration Assistance*, and *Training Standards for the Administration of Epinephrine Auto-Injectors*. The PeRRon (PeRRon, page 183) indicates that designated staff will be handling the varying components of medicaRon administraRon. This job responsibility will be shared by the office manager and the recepRonist. Although the reviewers assert there is no budget allocaRon for a nurse or health clerk to administer medicaRon, the PeRRon has allocated funds (Budget, object 5800) to provide the requisite training the office manager and recepRonist. The *Program Advisory*

on Medication Administration permits “unlicensed staff to administer medication if they have been trained and determined to be capable and competent to be able to safely and accurately administer the medication by a licensed health care professional, who is legally authorized to provide such training and determine competence.”

Moreover, the peRRoner’s policies include addiRonal safeguards to ensure student medicaRons are kept confidenRal and safe. “Designated staff will log medication administration times for each student and will establish a tickler system to ensure that medications are dispensed at the appropriate times...In cases where medications are long-term prescriptions, designated staff may provide parents with a notice to alert them that additional medication will soon be necessary” (PeRRon, page 183).

Element 8 – Admissions Requirements

The Statute and Regulations provide for the charter petition to identify admission requirements that are in compliance with applicable law. (Ed. Code, § 47605(b)(5)(H); Regulations, § 11967.5.1(f)(8).)

The Petition does not contain a sufficient description of the Charter School’s admissions requirements, based on the following findings:

1. **Enrollment Preferences.** *The enrollment process and preferences described do not meet legal requirements. In the event of a public lottery, only existing students of the Charter School may be exempted, yet ISLA intends to exempt children of Charter School “founders” as well (pg. 199). Additionally, District students must by law be afforded the highest preference in an admissions lottery, yet as a group they are listed fourth, behind siblings of enrolled students, children of employees and children of founders.*

Response:

ISLA maintains that its admission preferences are consistent with California EducaRon Code §§ 47605 (b) (f)(H), 47605 (d)(2)(B), 47605.3, 47614.5(c)(2) and applicable federal law and non-regulatory guidance. Although silent in California law, exempRon provisions for siblings, children of a charter school's founders, teachers, and staff are found within topic E-4 in the *Charter Schools Program, Title V, Part B of the ESEA, Nonregulatory Guidance* (United States Department of EducaRon, Washington DC, 2014) available at [hTp://w ww2.ed.gov/programs/charter/fy14cspnonregguidance.doc](http://www2.ed.gov/programs/charter/fy14cspnonregguidance.doc). The admissions preferences (PeRRon, 199) do not indicate a weight nor a sequence. Although California EducaRon Code § 47605 (d)(2)(B) provides that preferences “be extended to pupils currently attending the charter school and pupils who reside in the district,” it does not indicate that “District students” be afforded the highest preference. In fact, State law is silent on weighted admission loT eries. Notwithstanding the above, the admissions preference may be revised, if necessary, to qualify for Public Charter Schools Grant Program (PCSGP) funding. “However, should the preferences require modification in order to meet the requirements of the Public Charter Schools Grant Program (PCSGP), such modifications may be made at the proposed Charter School’s discretion without any need to materially revise the charter, as long as such modifications are consistent with the law and written notice is provided...” (PeRRon, page 200).” ISLA applied for \$575,000 in PCSGP funding and anRcipates to learn if it was awarded in December 2015.

Element 10 - Student Suspension and Expulsion Procedures

The Statute and Regulations require the Petition to describe the procedures by which students can be suspended or expelled. (Ed. Code, § 47605(b)(5)(J); 5 C.C.R. § 11967.5(f)(10).)

The Petition does not contain sufficient description of the procedures by which students can be suspended or expelled based on the following findings:

A. Willful Defiance. The Petition indicates the Charter School will regularly update its disciplinary policy to reflect Education Code Section 48900 et seq., and what follows is a recitation of those procedures. However, while the Petition identifies willful defiance as a possible reason for suspension or expulsion (pg. 206), no mention is made of Assembly Bill No. 420 (Stats. 2014, ch. 660) which expresses a public policy that children in kindergarten or any of grades 1 to 3 should not be suspended for willful defiance, and no student through grade 12 should be recommended for expulsion for willful defiance, in part because discipline for willful defiance has been disproportionately used to discipline minority students. We note that while a charter school is not legally required to follow statutory student discipline procedures contained in the Education Code, this Petitioner has chosen to follow those standards but does not seem to be aware of recent legal and policy developments in this area that have significant consequences for students.

Response:

Although the law permits charter schools to define their own student suspension and expulsion procedures, which the reviewers acknowledge within the factual finding, it is important to reemphasize that the PeRRon (PeRRon, page 205) explicitly states that ISLA “does not consider suspension or expulsions as effective means of improving student behavior and compliance with school rules and policies.” PosiRve Behavioral IntervenRon and Supports (PBIS) and restoraRve jusRce are major tenants of the ISLA discipline policy (PeRRon, page 203). The reviewers negaRvely characterize ISLA’s recitaRon of California EducaRon Code § 48900 regarding suspensions and expulsions but do not acknowledge ISLA’s emphasis that, *while either or both may become necessary in extraordinary circumstances, disciplinary issues shall first be attempted to be dealt with through other strategies*” (PeRRon, page 205).

B. Due Process. Neither the suspension nor expulsion procedures in the Petition provide for an opportunity to appeal a suspension or expulsion. This may violate a student’s due process rights, as the Petition states that the Board’s decision to expel shall be final.

Response:

The reviewers express concerns about due process. Specifically, they indicate that “*neither the suspension nor expulsion procedures in the petition provide an opportunity to appeal a suspension or expulsion.*” Appeals for suspensions are detailed in the PeRRon (PeRRon, page 214). Due process for expulsions is also described (PeRRon, page 210). Moreover, the PeRRon makes several references to due process and details safeguards for students not yet eligible for special educaRon services as well as intervenRon strategies for struggling learners – children who oBen Rmes are not afforded equal due process. The right to due process is inherent to the Common Principle 7 - a tone of decency and trust.

B. The Petitioners are Demonstrably Unlikely to Successfully Implement the Program. (Ed. Code, § 47605, subd. (b)(2).)

In determining whether Petitioners are demonstrably unlikely to succeed in implementing their educational program, the Regulations require consideration of, among other items:

- *Whether the petitioners have a past unsuccessful history of involvement in charter schools or other education agencies.*
- *Whether petitioners are unfamiliar with the content of the petition or the requirements of law that would apply to the proposed charter school.*
- *Whether petitioners have presented an unrealistic financial and operational plan for the) proposed charter school, including:)*

- *An administrative services structure that reflects an understanding of school business practices and expertise to carry out the necessary administrative services, or a reasonable plan and timeline to develop and assemble such practices and expertise.*
- *The adequacy and reasonableness of the operational budget, start-up costs, and cash flow, and financial projections for the first three years, including reasonable estimates of all anticipated revenues and expenditures necessary to operate the school, including, but not limited to, special education based, when possible, on historical data from schools or school districts of similar type, size, and location.*
- *A budget that in its totality appears viable and over a period of no less than two years of operations provides for the amassing of a reserve equivalent to that required by law for a school district of similar size to the proposed charter school.*
- *In the area of facilities, description of the types and potential location of facilities needed to operate the size and scope of educational program proposed in the charter, including evidence of the type and projected cost of the facilities that may be available in the location of the proposed charter school and reasonable costs for the acquisition or leasing of facilities to house the charter school, taking into account the facilities the charter school may be allocated under the provisions of Education Code section 47614.*

The Petitioners are demonstrably unlikely to succeed in implementing their proposed program, based on the following findings:

Before responding to each individual point raised by GUSD in their response, we feel that it is important highlight that In general, GUSD's budgetary assumptions were inaccurate and lacked a fundamental understanding of how charter schools work and therefore their conclusion that we would not be financially viable is faulty. Hundreds of charter schools use the same budgetary assumptions ISLA does and excel financially. Comparing a district budget that includes several schools to a single charter school budget, as GUSD did, is not the way to judge the financial soundness of a charter perRron.

1. Educational Program Staffing

- *The Staff Team has concerns regarding the Charter School's ability to provide adequate staffing to implement the dual immersion program in the four target languages identified in grades K-7 within its first year and grades K-8 in years two through five. As mentioned above, the Petition proposes employing 19 teachers within its first year but does not adequately explain how 19 teachers is sufficient to provide instruction in four target language for grades K-7 at the stated 23:1 class size ratio, especially considering that the projected enrollment numbers include 96 kindergarten students and 96 first grade students in Year One. Inadequate staffing will inhibit the core program of dual language immersion in four languages from being implemented.*

Response:

As noted in a previous factual finding response, the PeRRon states that the year one staffing plan accounts for mulRage grouping. "Since enrollment may be imbalanced in different grades, multiage grouping, such as a fourth and fifth grade class combined, may occur to enable ISLA to adequately staff while still operating within the budget" (PeRRon, page 157). The number of 33-35 teachers suggested by the reviewers for ISLA's first year of operaRon is a gross over-calculaRon and does not reflect the actual needs of the school. Beyond mulRage grouping, the PeRRon considers other efficient assignment strategies such as Strategic IntervenRons (PeRRon, page 40). Since mulRple subject credenRaled teachers can teach at the middle school level, one teacher is able to teach more than one subject in the upper grades. Departmentalizing in a cored seUng , such as math and science, is common within small middle

school programs. This is an important staffing consideration for the first few years until the teacher workforce evolves into a more single subject credential dominant teaching staff. ISLA is also able to employ multiple part-time teachers to address specific programming needs should these subject matter experts not be multiple subject credentialed. An exact distribution of teachers and corresponding assignments cannot be finalized until ISLA has enrollment. "Staffing will be proportionate to the student enrollment and aligned to budgetary allocations" (PeRRon, page 158). To provide support with staffing, ISLA will additionally avail itself to internship programs as described in the PeRRon (PeRRon, page 157). With an expected initial enrollment of 438 and 19 teachers, ISLA anticipates a teacher to student ratio of 1:23. ISLA's total education and staffing plans are comprehensive and adequate to execute the educational program.

2. Administrative Services Plan

- *The Petition states that International Studies Charter School, Inc., in Miami Florida was instrumental in developing ISLA's middle school plan. (pg. 10) It appears ISLA intends to continue collaborating with that school's principal, Victoriano Rodriguez, for curriculum, instructional support, and future development projects, and ISLA reserves well over \$250,000 for this collaboration over the course of five years. However, details of the proposed collaboration are not identified by the Petition. The Staff Team also questions whether it is appropriate or permissible for a public charter employee in Florida to act as a paid consultant to an unrelated California charter school.*

Response:

The PeRRon indicates an affiliation with International Studies Charter High School (PeRRon, page 10), not with Victoriano Rodriguez. International Studies, like ISLA, provide immersion and acquisition programs. This affiliation will enable direct access to one of the highest achieving charter schools in the country to catalyze successful student outcomes in the middle school. The affiliation with International Studies Charter School will provide for access to curriculum, leadership training and workshop programs for school administrators, onsite professional development for administrators and faculty; best practices support regarding classroom management and student assessment, instruction and education technology; support and assistance in attaining school accreditation; access to conferences, trainings, and consultation services that support the implementation of standard curriculum and best practices, model textbooks, proprietary materials, and educational programs.

- *Per the budget narrative, a company called "Academica" will be responsible for the ISLA's bookkeeping and financial reporting. Academica is located in Miami, Florida, and review of their website reveals only a single customer in California – one charter school in Los Angeles. Based on numerous and serious errors in ISLA's proposed budget and multi-year financial plan, the Staff Team does not believe that Academica has the knowledge or experience in California to support a start-up charter school. See further comments on the Budget/Financial Plan, below.*

Response: "

Academica provides educational services and support to over 100 schools across five states and the District of Columbia. There are multiple regional offices, including Academica California located in West Hollywood, California. Academica collectively coordinated 380 million in revenue for its clients last year. " Moreover, Academica's financial guidance has yielded a collective 200 million in net assets for its clients. " In the development of ISLA's budget, Academica collaborated with professionals from California Charter School Association, Charter School Management Corporation, and Vavrinek, Trine, & Day Co. LLP (VTD) – all California based. The reviewers mention that within the financial plan there are "numerous and)

serious errors.” While ISLA recognizes that there are areas for correction within the financial plan that do not affect the viability of the overall budget, many of the errors pointed out in the Staff Report are in fact due to misunderstandings of the reviewers.

3. Budget/Financial Plan

- *The Budget and Financial Plan for ISLA is wholly inadequate, relying on overstated revenues and under estimated expenses for the program described in the Petition. When the Staff Team attempted to model a budget using realistic assumptions for revenues and expenditures and based on the Franklin program it intends to emulate, the budget showed ISLA operating at a significant financial deficit in every year.*

For example:

Petitioners are looking to follow the “90/10 model” of dual language immersion currently in use at Franklin Magnet School in the District. While the District’s 2014-15 Unduplicated Pupil Count (“UPC”) percentage for its disadvantaged students districtwide is 55.8%, the Free and Reduced Rate for Franklin Magnet School is only 25.1%. The Charter School uses a UPC percentage of 55% for each year to develop its revenue projections. The difference between assuming that the Charter School’s UPC will mirror the District’s UPC as a whole rather than reflecting the most similar students is material to the revenue calculations of the Charter. When revenues are based on the demographics at Franklin, the total negative revenue impact over four years could be as much as \$766,000.

Response:

A chart with demographic information on the schools located in the target community is provided on pages 16-17 of the Petition. The average Free and Reduced Lunch Rate of these schools, as is indicated below, is 66%. Notwithstanding, a conservative approach reducing that value by ten percentage points, and which coincides with Glendale Unified School District’s Free and Reduced Lunch Rate was utilized. As is clearly demonstrated by the demographic chart, Benjamin Franklin Elementary’s Free and Reduced Lunch Rate is an outlier in the southern Glendale community. Moreover, should ISLA achieve this expected Free and Reduced Lunch Rate, it will qualify for increased Title 1 revenues and the Charter School Facility Grant Program (SB 740). To be conservative ISLA did not include potential revenue from SB 740 funds in the budget.

The Petitioners have, throughout the Petition, demonstrated a commitment to student economic diversity. At the very heart of this value is the mission of ISLA - *The mission of ISLA is to ensure high-level academics in core subjects and language acquisition for all students regardless of their socio-economic status or English language proficiency to promote global competence, college preparedness, and career readiness* (Petition, p. 3). The commitment to socioeconomically disadvantaged pupils is reaffirmed in the core value – Diversity in Learning. Lastly, the needs of socioeconomically disadvantaged pupils are thoroughly addressed in the educational program as well as teacher professional development activities.

School	Program Improvement Status	Minority	Socioeco Disadvan	English Learners	Students w Disabilities	Total Enroll
Balboa Elementary	N/A	24.3%	54.5%	42.0%	5.8%	719
Ben Franklin Elementary	Year 3	50.1%	30.4%	23.1%	6.4%	592
Cerritos Elementary	N/A	84.0%	87.0%	51.3%	6.5%	400
Columbus Elementary	Year 2	44.3%	80.0%	42.1%	11.9%	589
Glenoaks Elementary	N/A	38.4%	37.3%	18.9%	13.4%	560
Horace Mann Elementary	Year 2	57.9%	92.6%	65.3%	8.8%	660
John Marshall Elementary	Year 3	38.4%	84.7%	58.5%	13.1%	542
John Muir Elementary	Year 2	48.1%	79.1%	40.3%	3.7%	834
Mark Keppel Elementary	N/A	45.2%	42.5%	39.6%	5.1%	1001
R. D. White Elementary	Year 2	30.4%	60.5%	49.8%	7.9%	906
Thomas Edison Elementary	Year 2	70.8%	68.5%	35.2%	6.8%	853
Thomas Jefferson	Year 1	17.2%	75.3%	59.3%	8.0%	615
Eleanor J. Toll Middle	Year 4	38.4%	63.9%	18.5%	8.2%	1142
Theodore Roosevelt Middle	Year 5	64.9%	88.0%	14.2%	13.6%	830
Woodrow Wilson Middle	Year 3	38.9%	59.1%	15.0%	8.0%	1264
Average (Total Enrollment)		45%	66.0%	36%	8%	11507

- *The budget includes \$171/student annually for One-Time Mandate Revenue. By definition, one-time money is anticipated to be received only one time. To budget these windfall revenues each year results in overstated revenues. The total impact is \$465,000 overstated revenues over four years.*

Response: "

ISLA acknowledges that revenue from "One-Time Mandate" should be corrected to reflect a one-time source of revenue as this source of funds is approved annually. Notwithstanding, correcting this error continues to yield an annual surplus. "

- *The budget narrative states "Insofar as is feasible, teachers will be paid salaries commensurate with their experience and comparable to GUSD. A competitive benefits program will be developed for teachers and staff to enhance retention and employment satisfaction." (pg. 3) Both the salaries and benefits budgeted by the Charter School are far less than competitive and far below what the local teachers are currently being paid. The Charter School proposes compensation to employees that is significantly less than the compensation packages offered by the District. One such difference is that Charter School classified employees will not be members of PERS. While this saves the Charter School 12-20% annually in terms of statutory benefits, it costs employees significantly in lost retirement benefits. Teacher recruitment for positions that*

pay so poorly for a language immersion program will be problematic as it will likely reduce the quality of the employee pool and diminish the quality of the programs and services the Charter School would potentially provide to students and families.

Response:

The average teacher salary was based upon a review of salary tables from Glendale Unified School District, Burbank Unified School District, and Pasadena Unified School District. These three salary tables are located at the links below and are also provided in print copies as Exhibits L, M, and N. The average teacher salary included in the budget is a near value to those for the three comparable districts for teachers who are within the first few years of the profession. The PeRRoners understand the value of compeRRve compensaRon and demonstrate the same in the PeRRon. *"As the Charter School matures, teacher and staff salaries and benefits will increase* (PeRRon, page 160)." As previously indicated, the PeRRoners anRcipate addiRonal revenues not accounted for in the submiT ed budget. Should these revenues materialize, it is the intent of the PeRRoners to revisit teacher salary tables and where financially plausible either offer general increases, one-Rme salary increases, or end-of-year bonuses. Tangible compensaRon is not the only reason teachers or other staff seek employment. *"Teacher and staff input will be valued as this is a core component of job satisfaction. Accordingly, they will be provided opportunities for shared decision making with the proposed Charter School principal (see Element 1,"How Learning Best Occurs, Coalition of Essential Schools' 10 Common Principles Principle 3, Personalization, and Principle 7, Tone of Decency and Trust)* (PeRRon, pages 160-161)." The scope of budgeted benefits are comparable to those provided by GUSD and include paid medical, dental, life, short-term disability, and CalSTRS (for eligible members).

Glendale Unified Teacher Salary Schedule

[hTp://w ww.gusd.net/cms/lib03/CA01000648/Centricity/Domain/50/Appendix%20B%202014.pdf](http://www.gusd.net/cms/lib03/CA01000648/Centricity/Domain/50/Appendix%20B%202014.pdf)

Burbank Unified Teacher Salary Schedule

[hTp://w ww.burbankusd.org/files/user/109/file/A-1.pdf](http://www.burbankusd.org/files/user/109/file/A-1.pdf)

Pasadena Unified Teacher Salary Schedule

[hTp://w ww.pusd.us/files/_BOJjr_/bf0491c93df897b83745a49013852ec4/](http://www.pusd.us/files/_BOJjr_/bf0491c93df897b83745a49013852ec4/)

[CERTIFICATED_SALARY_SCHEDULE_C-1_10_MONTHS_PAID_OVER_11_MONTHS.pdf](#)

- *Instead of budgeting for furniture, textbooks and curricula expenses each year, ISLA is proposing to borrow funds to pay for these costs over five years. Only capital assets with a useful life over five years should be financed. The budget assumes lease payments for Furniture, Fixtures and Equipment of \$111,000 per year, and 40% of that is slated for texts/curricula (about \$97/student annually for text/curricula for four years.) Twenty percent of the payments, or \$48/student annually, are allocated for leased computer equipment (computers, laptops, smart boards.) Over four years, that is less than \$200/student for laptops, computers and smart boards. For the sake of comparison, the District is currently planning for new adoptions of curriculum in all subject areas and anticipates it will cost approximately \$1308/student for all subjects. The submitted budget for texts, curricula and technology appears low by at least half, on a per-pupil basis.*

Response:

The above finding is erroneous. The proposed Furniture, Fixtures, and Equipment is over four years, not five years. *"The budget assumes the lease will include a 4 year term* (Budget NarraRve, page 4)." The reviewers addiRonally erroneously note *"(about \$97/student annually for text/curricula)"* which is incorrect. *"ISLA budgeted \$900 per student to outfit the school with textbooks, furniture, technology and equipment... ISLA to dedicate 40% of the lease amount (\$44,500) to textbooks and core curricula materials* (Budget NarraRve, page 4)." Forty percent of \$900 equates to \$360 per student or \$173,880 in curricula purchases year one. The ISLA budget addiRonally allocates \$80 per student annually for the

replacement and purchasing of curricula. The reviewers provide a comparison that GUSD is planning on dedicating \$1308 for curriculum in all subject areas across the District. This is a faulty comparison as GUSD's calculations contemplate expenditures for curriculum and grade spans which exceed those of ISLA.

- *Special education encroachment costs are significantly under-budgeted. Special education students represent approximately 12% of the District's total student population. On average, the District spends approximately \$18,000 per special education student, compared to \$8,000 per general education student. The District's current rate of encroachment is 10.5% of its general fund, but ISLA has budgeted only 2.4% of its general fund to pay excess costs of special education services over the revenues it will receive for special education services.*

Response:

The reviewers selectively utilized their district average of \$18,000 for special education expenditures rather than contemplating what the targeted community average would be that was specified in the petition. As indicated in the chart above and on page 40 of the Peon, the average special education rate of the targeted community is 8%. We believe the budgeted amount (Budget, object 7010) is a reasonable assumption given the target community. In addition, it is important to consider that the use of a SELPA, like El Dorado, entitles us to additional support for students who have more intensive needs. Moreover, the reviewers indicate that ISLA budgeted only 2.4% of its general fund to pay excess costs of special education services over the revenues received for special education. Calculating State Revenue (\$1,937,449, \$83,220, \$872,313, and \$64,496 - Budget, objects 8011, 8012, 8096, 8560) plus Local Revenue (\$3,207 Budget, object 8660 and \$208,050 object 8792) equals \$3,168,735. With \$160,374 allocated (Budget, object 7010) to special education encroachment, this yields just over 5% of the school's State and local revenue, not 2.4%.

- *A total professional development budget of \$10,000 means 23 certificated teaching staff will have \$435 each for professional development opportunities offered "locally and nationwide." This is likely inadequate, especially for a new school and given the broad range of curricular and instructional methodologies proposed by the Petition. As a point of comparison, the District currently spends more than \$2750 per teacher for professional development opportunities. Long distance travel to out-of-state seminars will not be possible.*

Response:

The budget explicitly allocates \$6,500 (Budget, object 5200) for travel and conference and \$10,000 (Budget, object 5210) for training and development. Moreover, "[t]hrough its affiliation agreement, International Studies Charter (Florida) will also provide professional development opportunities (Peon, page 83)." "A budget item enabling direct collaboration with the staff of both schools has been included in the 5810 line of the attached budget (Peon, page 10)." This affiliation accounts for an additional \$32,075 in the budget for professional development activities specific to the implementation of a middle school acquisition and immersion. Total spending for professional development activities per teacher therefore equals \$2,112, not \$435 as the Staff Report asserts. Academica California, ISLA's educational services and support provider, also provides regulatory compliance professional development such as, the coordination of training for staff regarding mandated reporter training, OSHA compliance, and the prevention of workplace harassment at no additional cost to ISLA. Academica California will also provide designated administrative staff with training and support on school recordkeeping through its designated Management Information Services (MIS) program(s) and proper training regarding pupil and public records, as well as reporting to California Longitudinal Pupil Achievement Data System (CALPADS), schoolsforus, California Basic Educational Data System (CBEDS), Civil Rights and Diversity Compliance

(CRDC), Child Nutrition In formation and Payment System (CNIPS), and California State Teachers' Retirement System (CalSTRS). Notwithstanding the above, the reviewer's rationale does not account for in-house professional development. It is customary in schools to "train-the-trainer." The principal and faculty can become trainer trained for professional development activities, ranging from instructional practices to classroom management, and thereby yield additional cost savings to ISLA. Even if funds were limited to traveling off-site, there are a large number of free online trainings which can be incorporated into a professional development program.

- *Custodial costs for a school the size of ISLA are about half of what is necessary to maintain school facilities to an adequate standard. In addition, maintenance has been budgeted at 0.4% of ISLA's budget, compared with the state-mandated standards for district facilities of 3% of a district's budget.*

Response:

ISLA plans to contract with a local janitorial service provider. Costs associated with janitorial services, for other Academica clients, range anywhere from 11-13 cents per square foot per month. This price range includes facility cleaning five days a week and floor care throughout the year. ISLA's budget also includes \$17,500 (Budget, object 5601) for facility maintenance throughout the year. Thus, the 0.4% calculation is erroneous as ISLA will employ more than 1% of the revenues to facility maintenance. ISLA will adjust the facility maintenance budget based upon the condition of the facility it occupies. Additionally, the budget did not include potential revenue from the Charter School Facility Grant Program (SB 740), for which the Peoners believe ISLA will be eligible.

- *Petitioners confuse the concepts of budget and cash flow, resulting in a duplication of revenue and expenses in the budget. In particular, the budget includes cash flow loan proceeds as revenue, while also considering state apportionment payments as revenue. Booking both the receivable (revenues to come) and the temporary cash borrowing as revenue results in a double counting of revenue and expenses.*

Response:

There are two standard ways to prepare a forecast - one is an income statement forecast and the other is a cash flow forecast. ISLA elected to prepare a cash flow forecast because California requires it. ISLA believed that it was important to highlight both the timing and the nature of expected cash flows; given that ISLA will be a new school. Accordingly it is important to provide insight into both components. If ISLA had done an income statement forecast, the timing aspect of the cash flows would not have been visible to GUSD. Unfortunately, GUSD appears to have read the forecast as only being an income statement forecast and therefore assumed that ISLA was double counting certain items. This is not the case - all items are only taken into consideration one time.

4. Charter School Location/Facility

- *Education Code section 47605(a) requires charter school petitions to identify a single location within its authorizers boundaries, and to identify the facilities to be used by the school. The Petition fails to offer anything definitive regarding the facility plan for ISLA. The Petition does not identify a proposed location, but states only its intent "to locate ISLA in south Glendale ... below or around State Route 134/Ventura Freeway." (pg. 14) While the Petition lays out a vision for its ideal space design, and identifies potential sources of funds to develop a private facility, the information provided is inadequate and underestimates how much time it will take to find land or*

space and develop a facility that is appropriate for use as a public school and to obtain the appropriate City permits. Although the Petition references as an alternative using a District facility under Proposition 39, the Petitioners did not submit a request for facilities by the November 1, 2015 deadline.

Given these caveats and the tentative nature of Petitioner's final facility location, it is unknown whether the budget adequately provides for facilities lease costs, or whether ISLA could find a facility in time to open in the fall of 2016. The Petition does not offer any specific information regarding even potential or available facilities.

Response:

California law does not require a facility to be identified prior to charter authorization. This is the reason for the common practice of conditional authorization. The reviewers acknowledge *"the Petition lays out a vision for its ideal space design, and identifies potential sources of funds to develop a private facility."* The petitioners understand the complexities of real estate acquisition and have engaged Academica California to assist in the process. Academica has assisted over 100 schools (across five states and the District of Columbia) in identifying their facility. *"The petitioners have already begun real estate dialogue with property owners. Once the charter is granted conditional approval, the petitioners anticipate more engaging lease negotiations to properly zone a facility to house the proposed Charter School (Peon page 228)."*

The petitioners did not seek a Proposition 39 facility because they have firsthand knowledge that no district facility could accommodate ISLA. In addition, during a meeting with staff on June 26, 2015, Mr. Robert McEnroe made clear that there was no available facility within GUSD. During ISLA's presentation at the November 17, 2015, Glendale Unified School District Board of Education meeting, Co-lead petitioner Hilary Stern expressly conveyed that ISLA did not seek a Proposition 39 facility. Notwithstanding, in future Proposition 39 funding years, ISLA welcomes alternative mutually agreed upon agreements which may provide for equitable facilities use and equipment for the proposed Charter School pupils. Such agreements are consistent with California Code of Regulations, Title 5, § 11969.1(b) which provides for charter schools and school districts to mutually agree upon said alternatives (page 229).

C. The Petition Fails to Present a Sound Educational Program (Ed. Code § 47605, subd. (b)(1).)

The Regulations define an "unsound education program" as one that involves activities that the SBE determines would present the likelihood of physical, educational, or psychological harm to the affected pupils; or that the SBE determines not to be likely to be of educational benefit to the pupils who attend. (Regulations, § 11967.5.1(b)(1), (2).)

- 1. The Petition fails to set out a sound educational program for the reasons described in section V-A above with regard to the deficiencies in the description of the Education Program proposed by the Charter School, which findings are hereby restated.*

VI. CONCLUSION

For the reasons stated above, the Petition, as submitted, fails to provide a reasonably comprehensive description of several essential charter elements; suggests that the Petitioners are demonstrably unlikely to successfully implement the program presented in the Petition; and presents an unsound educational

program. Accordingly, it is recommended by the District Staff Team that the Petition be denied. Should the Board take action to deny the Petition, it may adopt this Report as the written factual findings required to support its denial of the Petition.

Closing Petitioner's Response:

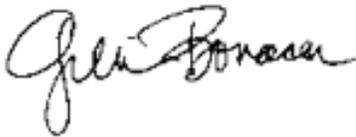
As articulated in the above responses to the Staff Report, the peoner s and ISLA board members strongly assert that GUSD did not meet the required state mandated threshold for denial. We further bring into question the recommendation of denial by the staff as it was based in large part on inaccuracies in the reading of the Peon, a surface understanding of charter school operations and charter law indicating a lack of due diligence on the staff's part.

The peon process with GUSD was particularly disappointing in that neither staff nor members of the GUSD Board of Education elected to meet with us during the peon evaluation period thereby choosing not to take advantage of their own AR policy which would have served the process well to clarify a majority of the findings included in the Staff Report. There was no capacity interview with GUSD and only 15 minutes were allowed to ISLA during the November 17, 2015 board meeting in which to make a presentation about the charter peon. Each board member asked only one question during this meeting and no questions were asked of staff on the December 15, 2015 board meeting prior to their vote to deny, citing exclusively the budget comparisons between ISLA and the District. We believe we will be able to provide a high quality public school option with the presented educational program and corresponding assumptions made in the budget.

In conclusion, ISLA believes this charter Peon was not afforded a fair review at the local level and look forward to the appeal process with LACOE.

Thank you for your time and positive consideration in reviewing ISLA's appeal. We look forward to moving forward in the appeal process and meeting you at the capacity interview.

Sincerely,



Gillian Bonacci
Lead Peoner



Hilary Stern
Lead Peoner



Exhibit List

Exhibit A

Glendale Unified School District Board Administrative Regulation 0420.4

Exhibit B

September 14, 2015 Electronic Correspondence from ISLA Lead Petitioner Gillian Bonacci to Dr. Kelly King, GUSD's Assistant Superintendent, Educational Services

Exhibit C

December 9, 2015 Electronic Correspondence from ISLA Lead Petitioner Gillian Bonacci to GUSD Board of Education

Exhibit D

November 16, 2015 Electronic Correspondence from California Charter Schools Association to GUSD Board of Education re: Support for Authorization of International Studies Language Academy (ISLA)

Exhibit E

109 Additional Signatures of Interest from Benjamin Franklin Elementary Families

Exhibit F

May 1, 2014 Minutes, Franklin Magnet Advisory Council

Exhibit G

March 27, 2014 Minutes, Franklin Magnet Advisory Council

Exhibit H

October 20, 2015 Presentation to GUSD Board of Education titled, *"Enrollment Impact Analysis"*

Exhibit I

August 7, 2013, GUSD Board Meeting, titled *"Dual Immersion Program Update"*

Exhibit J

GUSD's 2014-2015 Report titled *"Public School Choice and Supplemental Educational Services Participation Report"*

Exhibit K

December 7, 2015 Electronic Correspondence from El Dorado SELPA to GUSD re ISLA SELPA Application

Exhibit L

October 13, 2015 Electronic Correspondence from GUSD to ISLA Board re board member information

Exhibit M

Glendale Unified School District Annual Salary Schedule - Teachers

Exhibit N

Burbank Unified School District Salary Schedule for Full-Credentialed Certificated Bargaining Unit Members

Exhibit O

Pasadena Unified School District Salary Schedule

Exhibit P

California Commission on Teacher Credentialing Leaflet on Sojourn Certificated Employee Credential (CL-568)

Exhibit Q

Italy Teacher Salary Table

Exhibit R

France Teacher Salary Table

Exhibit S

Spain Teacher Salary Table

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Administrative Regulation

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Philosophy - Goals - Objectives and Comprehensive Plans

Charter School Authorization

It is the intent of the Board of Education ("Board") to fully comply with the Charter Schools Act of 1992 as amended and other applicable state and federal law by providing opportunities for the establishment of independent charter schools. In order to implement state law while providing guidance to petitioners and direction to staff, the District establishes the following regulations.

Components of Charter Petition:

To be considered by the Board, a charter school petition for the establishment of a charter school within the District must, at minimum, include the following: (Education Code 47605)

A. Petition Signatures

1. A completed signature page pursuant to Education Code section 47605 that includes signatures from either:
 - a. A number of parents/guardians equivalent to at least one-half of the number of students that the charter school estimates will enroll in the charter school for its first year of operation;
 - b. A number of teachers equivalent to at least one-half of the number of teachers that the charter school will be employed at the school during its first year of operation; or
 - c. At least 50 percent of the permanent status teachers currently employed at the public school to be converted if the charter petition calls for an existing school to be converted.
2. In circulating a petition, the petitioners shall include a prominent statement explaining that a signature on the petition means that the parent/guardian is meaningfully interested in having his/her child(ren) attend the proposed charter school, or in the case of a teacher's signature, that the teacher is meaningfully interested in teaching at the proposed charter school, and holds a valid California teaching credential. Interested parents shall also print their names, addresses, phone numbers, children's names, current grade, school, and district of residence. Interested teachers shall also print their names, addresses, phone numbers, and credentials held.
3. The proposed charter shall be attached to the petition.

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Philosophy - Goals - Objectives and Comprehensive Plans

Charter School Authorization

B. Charter Provisions

1. The charter petition shall include affirmations of the conditions described in Education Code 47605(d) as well as reasonably comprehensive descriptions of: (Education Code 47605, 47611.5)

- a. The educational program of the school designed, among other things, to identify those whom the school is attempting to educate, what it means for a student to be an "educated person" in the 21st century and how learning best occurs. The goals identified in that program shall include the objective of enabling students to become self-motivated, competent and lifelong learners.

The petition shall include a description of annual goals for all students and for each numerically significant subgroup of students identified pursuant to Education Code 52052, including ethnic subgroups, socioeconomically disadvantaged students, English learners, students with disabilities, and foster youth. These goals shall be aligned with the state priorities listed in Education Code 52060 that apply to the grade levels served or the nature of the program operated by the charter school. The petition also shall describe specific annual actions to achieve those goals. The petition may identify additional priorities established by the charter school, goals aligned with those priorities, and specific annual actions to achieve those goals.

If the proposed school will serve high school students, the petition shall describe the manner in which the charter school will inform parents/guardians about the transferability of courses/course credits to other public high schools and the eligibility of courses to meet college entrance requirements. Courses offered by the charter school that are accredited by the Western Association of Schools and Colleges may be considered transferable, and courses approved by the University of California or the California State University as creditable under the "A-G" admissions criteria may be considered to meet college entrance requirements.

- b. The measurable student outcomes identified for use by the charter school. "Student outcomes" means the extent to which all students of the school demonstrate that they have attained the skills, knowledge and attitudes specified as goals in the charter school's educational program, including

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Philosophy - Goals - Objectives and Comprehensive Plans

Charter School Authorization

outcomes that address increases in student academic achievement both schoolwide and for each numerically significant subgroup of students served by the charter school. The student outcomes shall align with the state priorities identified in Education Code 52060 that apply for the grade levels served or the nature of the program operated by the charter school.

- c. The method by which student progress in meeting the outcomes identified in the charter will be measured, as well as a discussion of how the charter school shall meet all statewide standards and conduct the pupil assessments required pursuant to Education Code Section 60605 and any other statewide standards authorized in statute or pupil assessments to pupils in non-charter public schools, including passage of the High School Exit Examination for graduation, as required. To the extent practicable, the method for measuring student outcomes for state priorities shall be consistent with the way information is reported on a school accountability report card.
- d. The governance structure of the school, including but not limited to, a detailed discussion of:
 - The process to be followed by the school to ensure parent/guardian involvement and the role of parents, students, staff and community in the governance structure.
 - The status of the school as a non-profit public benefit corporation or a public school, including copies of the Articles of Incorporation and Bylaws. Notwithstanding other laws to the contrary, all records of the non-profit public benefit corporation shall be public.
 - Assurance of compliance with the Brown Act.
 - Assurance of compliance with the Political Reform Act, Government Code 1090, and other laws on conflict of interest, and demonstration of understanding of the impact of compliance with those laws on the proposed governance structure.
- e. The qualifications to be met by individuals to be employed by the school.
- f. The procedures that the school will follow to ensure the health and safety of students and staff. These procedures shall include the requirement that each school employee furnish the school with a criminal record summary as described in Education Code 44237, as well as verification of tuberculosis testing and clearance.

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Charter School Authorization

- g. The means by which the school will achieve a racial and ethnic balance among its students that is reflective of the general population residing within the District's territorial jurisdiction.
- h. Admission requirements if applicable.
- i. The manner in which annual independent financial audits shall be conducted, which shall employ generally accepted accounting principles, and the manner in which audit exceptions and deficiencies shall be resolved to the satisfaction of the Board.
- j. The procedures by which students can be suspended or expelled.
- k. The manner by which staff members of the charter schools will be covered by the State Teachers' Retirement System, the Public Employee's Retirement System or federal social security.
- l. The public school attendance alternatives for students residing within the District who choose not to attend charter schools.
- m. A description of the rights of any District employee upon leaving District employment to work in a charter school, and of any rights of return to the District after employment at a charter school, subject to District policies, regulations and any applicable collective bargaining agreements.
- n. The proposed school facilities, together with drawings, photographs, site location maps, copies of leases, purchase agreements or other documents which provide reasonable evidence that the charter school facility is or will be safe, habitable, well-suited for its educational purpose, and that applicant has secured or has reasonable assurance of securing the facility for use by the charter school.
- o. A detailed, complete, and fully annotated operational budget with estimates of charter school revenues and expenditures, cash-flow, and reserve positions, for the first three years of operation, including startup costs and the precise salary and benefits paid and to be paid to charter school employees.
- p. A summary of the administrative structure and organization of the school. The summary should specifically include school District liaison, special

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education and other basic elements of school operation, as well as a discussion of how the charter school intends to meet the needs of students with disabilities. This discussion shall include descriptions of the means of providing services and ensuring compliance with state and federal law and complying with the Individuals with Disabilities Education Act and Section 504 of the Rehabilitation Act of 1973. Unless the charter school has been accepted as a local education agency member of another Special Education Local Plan Area, this shall include assurances and a description of how the charter school shall comply with the requirements contained in the Local Plan of the Special Education Local Plan Area (SELPA).

- q. The education, work experience, credentials, degrees and certifications of the individual persons comprising, or proposed to comprise, the directors, administrators and managers of the proposed charter school.
- r. The By-laws, articles of incorporation and other management documents, as applicable, governing, or proposed to govern, the charter school.
- s. A list of committed parents and students for the first year of charter school operation.
- t. The procedures to be followed by the charter school and the Board to resolve disputes relating to charter provisions, which do not include any additional procedures to revoke a charter nor limit the Board's authority to revoke a charter.
- u. A declaration regarding whether or not the charter school shall be deemed the exclusive public school employer of the employees at the charter school for the purposes of collective bargaining pursuant to the Educational Employment Relations Act, Government Code Sections 3540-3549.3.
- v. The procedures to be used if the charter school closes, including, but not limited to: (5 CCR 11962)
 - i. Designation of a responsible entity to conduct closure-related activities
 - ii. Notification to parents/guardians, the Board, the county office of education, the special education local plan area in which the school

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participates, the retirement systems in which the school's employees participate, and the California Department of Education, providing at least the following information:

- (1) The effective date of the closure
 - (2) The name(s) and contact information of the person(s) to whom reasonable inquiries may be made regarding the closure
 - (3) The students' districts of residence
 - (4) The manner in which parents/guardians may obtain copies of student records, including specific information on completed courses and credits that meet graduation requirements
- iii. Provision of a list of students at each grade level, the classes they have completed, and their districts of residence to the responsible entity designated in accordance with item #16a above
 - iv. Transfer and maintenance of all student records, all state assessment results, and any special education records to the custody of the responsible entity designated in accordance with item #16a above, except for records and/or assessment results that the charter may require to be transferred to a different entity
 - v. Transfer and maintenance of personnel records in accordance with applicable law
 - vi. Completion of an independent final audit within six months after the closure of the school that includes an accounting of all financial assets and liabilities pursuant to 5 CCR 11962 and an assessment of the disposition of any restricted funds received by or due to the school
 - vii. Disposal of any net assets remaining after all liabilities of the school have been paid or otherwise addressed pursuant to 5 CCR 11962

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- viii. Completion and filing of any annual reports required pursuant to Education Code 47604.33
 - ix. Identification of funding for the activities identified in item #v above
 2. The petition also shall include affirmations of the conditions described in Education Code 47605(d), including:
 - a. Assurances that the charter schools shall be nonsectarian in its programs, admission policies, employment practices and all other operations; shall not charge tuition; and shall not discriminate against any student on the basis of the student's actual race, color, ancestry, national origin, ethnic group identification, age, religion, marital or parental status, physical or mental disability, sex, sexual orientation, gender, gender identity, or gender expression; the perception of one or more of such characteristics; or association with a person or group with one or more of these actual or perceived characteristics.
 - b. Assurances that the charter school shall admit all students who wish to attend the school regardless of their place of residence, unless the number of pupils exceeds the schools capacity, in which case:
 - i. Any existing public school converting partially or entirely to a charter school shall adopt and maintain a policy giving admission preference to students who reside within the school's former attendance area.
 - ii. If the number of students who seek to attend the charter school exceeds the school's capacity, admission of new students shall be determined by a public random drawing. Preferences shall be extended to students currently attending the charter school and students who reside in the District.
 - iii. Other admission preferences permitted by the Board on an individual school basis, if consistent with law.
3. The petition should demonstrate petitioners' recognition that although generally exempt from state laws specifically pertaining to school districts, charter schools are still a part of the public school system and must comply with many other laws.

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These may include, but are not limited to: the U.S. Constitution and all other applicable federal laws, including but not limited to all anti-discrimination and civil rights statutes, the No Child Left Behind Act, Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act; the State Constitution, and certain California laws; i.e., the Brown Act (Public Meeting Law), the Public Records Act, conflict of interest laws, Government Code Section 1090 and the Political Reform Act, Government Code sections 87000 et. seq., laws relating to the minimum age for public school attendance and fingerprinting of employees.

4. The petition should enclose a proposed school calendar, staff development procedures, assurances that the school will provide appropriate services for English Language Learners, and any other information that will assist the Board in understanding the charter school proposal.
5. The petition should include information regarding the proposed operation and potential effects of the charter school, including but not limited to a description of: (Education Code 47605, 47605.1)
 - a. The facilities to be used by the school, including where the school intends to locate;
 - b. The manner in which administrative services of the school are to be provided, including, if applicable, the name, address, and qualifications of any consultants and/or management company that the petitioner has engaged or proposes engaging;
 - c. Potential civil liability effects, if any, upon the school and district. In order to minimize such effects, the Board recommends that charter schools should be operated as or by nonprofit corporations that comply with laws applicable to public entities;
 - d. Financial statements that include a proposed first-year operational budget, including start-up costs, and cash-flow and financial projections for the first three years of operation; and
 - e. Adequate processes and measures for holding the charter school accountable for fulfilling the terms of its charter and complying with all applicable laws.

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6. Location of Charter School: Unless otherwise exempted by law, any charter petition submitted to the Board shall identify a single charter school that will operate within the geographic boundaries of the district. A charter school may propose to operate at multiple sites within the district as long as each location is identified in the petition. (Education Code 47605, 47605.1) A charter school may establish a resource center, meeting space or other satellite facility located in an adjacent county if both of the following conditions are met: (Education Code 47605.1)
 - The facility is used exclusively for the educational support of students who are enrolled in non classroom-based independent study of the charter school.
 - The charter school provides its primary educational services in, and a majority of the students it serves are residents of, the county in which the school is authorized.

A charter school that is unable to locate within the district's jurisdictional boundaries may establish one site outside district boundaries but within the county, if all of the following are met: (Education Code 47605, 47605.1)

- The Board is notified prior to approval of the petition.
- The County Superintendent of Schools and Superintendent of Public Instruction are notified before the charter school begins operations.
- The school has attempted to locate a single site or facility to house the entire program but such a facility or site is unavailable in the area in which the school chooses to locate, or the site is needed for temporary use during a construction or expansion project.

C. Recommended Charter Petitioner Submission Procedure and Timeframe

1. Petitions shall be submitted in final form and shall contain all of the information the charter petitioners intend for consideration by the District. Information or documentation provided after the original submission may not be accepted or considered as part of the petition review process, at the sole discretion of the District. The District reserves the right to reject or deny a petition that does not contain all the required petition placements.
2. For purposes of this regulation, submission and receipt of a petition means the date of presentation of the petition to the Board at a public meeting, not the date the petition was received by the District.

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3. The Board recommends that a complete petition be submitted by no later than December 31 for consideration to open a charter school on or after July 1 of the next school year. Petitions received between January 1 and April 15 shall generally be deemed suitable for consideration for a starting date in the subsequent school year. For example, the Board recommends that a petition received by December 31, 2009 propose a starting date on or after July 1, 2010 while a petition received between January 1, 2010 and April 15, 2010 propose a starting date on or after July 1, 2011. Petition submission between April 15 and August 1 is strongly discouraged, as there are insufficient opportunities for Board and staff review during those months.

D. Charter Review and Approval/Denial

The District shall conduct a comprehensive review of all charter petitions presented for compliance with applicable laws and regulations. Upon receipt of a charter school petition at a public meeting of the Board, the District shall date stamp the cover page of the submitted application and forward the application to the Superintendent or designee.

The Board, Superintendent, and District staff shall generally follow the procedures below for review of charter petitions:

1. Within five (5) days of submission, the Superintendent's designee shall review the application for completeness. The petition shall minimally include the items listed in this regulation and as required by Education Code Section 47605. Any petition that does not include all required elements may be returned to the petitioner with a brief description of the missing elements, and a copy of Board Policy and Administrative Regulation 0420.4.
2. Within ten (10) days of receipt of a complete petition, the Superintendent's designee shall transmit a copy of the petition for review by the business, personnel, curriculum/instruction and special education departments. Legal counsel may also be engaged to review the petition.
3. Within 30 days of receiving a complete petition to establish a charter school, the Board shall hold a public hearing on the proposed charter. Notice of the public hearing shall be provided five (5) days in advance to the petitioner and each bargaining unit representing employees in the District. At the public hearing, the Board will consider the level of support for the petition by teachers and other employees of the District, as well as parents/ guardians. The charter petitioner may be asked to make a brief presentation to the Board at this time.

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4. Within sixty (60) days of receipt of a complete petition, District staff shall analyze the petition based on compliance with Board Policy, Administrative Regulation, and The Charter Schools Act, as amended, and other applicable state and federal law. Staff shall draft a recommendation regarding approval or denial of the petition with specific reasons there for.
5. During the time in which a petition is being evaluated, District staff and petitioners may draft a Memorandum of Understanding that clarify matters in the charter, address those matters not provided in the charter, and set forth the charter school's and District's responsibilities regarding the operation of the charter school.
6. Within 60 days of receiving a petition, or within 90 days given the consent of the petitioners and the Board, the Board shall consider staff recommendations and determine whether to grant or deny the petition to establish a charter school.
7. The Board shall grant a petition for the establishment of a charter school if doing so is consistent with sound educational practice. As such, Petitioner should provide substantial evidence: that the proposed school presents a sound educational program and comports with sound educational practice; that petitioners are demonstrably likely to successfully implement the program as set forth in the petition, and that all other legal requirements for charter petitions have been met. The determination of what constitutes a sound educational program, sound educational practices, and whether petitioners are demonstrably likely to successfully implement the program shall rest solely with the District. To this end, the District may require petitioners to submit documentary or testimonial evidence of expertise in school operations, acceptable and legal practices, policies and protocols that exceeds the standards of other district, counties, or the State of California, but that shall be within the scope of the District's discretion as a charter authorizer.
 - a. Charter Term: An initial approval of a charter may be granted for a term not to exceed five years. (Education Code Section 47607). The District may require that the term be concurrent with the regular school or fiscal year to ensure that disruption to the educational program and charter students is minimized by mid-year non-renewals.
 - b. Memorandum of Understanding: The District recognizes the benefits and importance of memorializing agreements with charter schools regarding

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the provision of administrative services, where applicable, and respective operational responsibilities. The charter school petitioner shall be required to enter into a Memorandum of Understanding (MOU) with the district. The MOU shall clarify matters in the charter, address those matters not provided for in the charter, and set forth the charter school's and district's responsibilities regarding the operation of the charter. If the Superintendent is recommending approval of the charter, the MOU may be presented at the Board meeting when charter approval is under consideration. The term of the MOU shall coincide with the term of a charter.

- c. Facilities Requests: The District and charter school shall comply with the requirements of Education Code § 47614 et. seq. and the regulations at 5 Cal. Code Regs 11969 et. seq. and applicable case law regarding the charter school's use of a district facility. Any agreement for the provision of a district facility, where applicable, shall memorialize the expectations and legal responsibilities of the parties and contain the information required by 5 Cal. Code Regs 11969.9. It is the responsibility of the petitioner to ensure that it has submitted and obtained approval of its charter in accordance with applicable timelines if facilities are going to be requested.
- d. Insurance, Indemnity, and Hold Harmless: The charter school shall purchase and maintain liability insurance in a form acceptable to the District naming the District as an additional insured, and provide a hold harmless and indemnification agreement.

In granting charter petitions, the Board shall give preference to schools best able to provide comprehensive learning experiences for academically low achieving students according to standards established by the California Department of Education under Education Code 54032.

- 8. A charter petition shall be denied only if the Board makes written specific factual findings that one or more of the following conditions exist:
 - a. The charter school presents an unsound educational program for the students to be enrolled in the charter school.
 - b. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

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- c. The petition signatures do not meet minimum requirements.
- d. The petition does not contain an affirmation of each of the conditions described above and in Education Code 47605(d), as listed in the "Components of a Charter Petition" above.
- e. The petition does not contain reasonably comprehensive descriptions of the provisions described above and in the Education Code 47605(b).

If the Board denies a petition, petitioners may submit the petition to the County Board of Education for review pursuant to Education Code Section 47605(j).

- 9. The Board also shall not approve any charter petition that authorizes the conversion of a private school to a charter school.
- 10. The Board shall not deny a petition based on the actual or potential costs of serving students with disabilities, nor shall it deny a petition solely because the charter school might enroll disabled students who reside outside the special education local plan area (SELPA) in which the district participates. (Education Code 47605.7, 47647)
- 11. The petitioners shall provide written notice of the Board's approval and a copy of the charter to the State Board of Education.
- 12. The approval and denial of a charter petition shall not be controlled by collective bargaining agreements nor subject to review or regulation by the Public Employment Relations Board.

E. Material Revisions to Charter

Material revisions to a charter shall only be made only with Board approval and shall be governed by the same standards and criteria that apply to new charter petitions as set forth in Education Code 47605 and this Regulation. These criteria shall include, but not be limited to: a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed. (Education Code 47607)

If, after receiving approval of its petition, a charter school proposes to establish operations at one or more additional sites within the district's boundaries, the charter

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school shall request a material revision to its charter and shall notify the Board of those additional locations. The Board shall consider approval of the additional locations at an open meeting. (Education Code 47605)

F. SELPA Involvement with Approval and Renewal of Charters

1. Prior to approval of a new charter, or renewal of an existing charter, the Superintendent or designee shall refer the petition to the SELPA Charter School Committee. This SELPA-level committee will be comprised of the SELPA Director and representatives, appointed by the Superintendent, from each member district. The committee will meet to review the Charter School application and consider provision of special education services to students enrolled by the charter school. This committee will make a recommendation to the Board of Education regarding the Charter School petition. The petitioner must provide adequate assurances that all eligible students enrolled in the charter school will receive appropriate special education services in accordance with the Foothill SELPA local plan. The charter must provide assurances that no student will be denied enrollment in the charter school due to a disability or the charter school's inability to serve the student at its school site. The SELPA Director will be available to provide consultation on the potential impact that may be associated with granting the requested charter petition.
2. An approved charter school must delineate the entity responsible for providing special education instruction and services, any anticipated transfer of special education funds between the granting district and the charter school and any provisions for sharing deficits in funding. These provisions may be included in a Memorandum of Understanding.
3. If a charter school wishes to change from a school of the district to a local educational agency for purposes of special education during any term, the charter school must seek a material revision to its charter pursuant to the law and this Regulation.

G. Requirements for Charter Schools:

In providing general oversight of a charter school, the Board shall determine whether the school plans to meet the legal requirements applicable to charter schools. Each charter school shall:

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1. In order to generate state funding based on average daily attendance, a charter school student shall be a California resident and, if over 19 years of age, shall be continuously enrolled in a public school and making satisfactory progress toward a high school diploma, as defined in 5 CCR 11965.
2. Be nonsectarian in its programs, admission policies, employment practices and all other operations. (Education Code 47605)
3. Not charge tuition. (Education Code 47605)
4. Not discriminate against any student on the basis of the student's actual race, color, ancestry, national origin, ethnic group identification, age, religion, marital or parental status, physical or mental disability, sex, sexual orientation, gender, gender identity, or gender expression; the perception of one or more of such characteristics; or association with a person or group with one or more of these actual or perceived characteristics. (Education Code 47605)
5. Adhere to all laws establishing minimum age for public school attendance.
6. Admit all students who wish to attend the school, according to the following criteria and procedures:
 - a. Admission to the charter school shall not be determined according to the student's place of residence, or that of his/her parents/guardians, within this state, except that any existing public school converting partially or entirely to a charter school shall adopt and maintain a policy giving admission preference to students who reside within the school's former attendance area. (Education Code 47605) If a charter school will be physically located in a public elementary school attendance area in which 50 percent or more of the student enrollment is eligible for free or reduced price meals, it may also establish an admissions preference for students who are currently enrolled in the public elementary school and for students who reside in the public school attendance area. (Education Code 47605.3)
 - b. If the number of students who wish to attend the charter school exceeds the school's capacity, attendance shall be determined by a public random drawing, except that preferences shall be extended to students currently attending the charter school and students who reside in the district, except as provided for in Education Code 47614.5. In the event of a drawing, the

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Board shall make reasonable efforts to accommodate the growth of the charter school and shall not take any action to impede the charter school from expanding enrollment to meet student demand. (Education Code 47605)

- c. Other admissions preferences may be permitted by the Board on an individual school basis as consistent with law.
7. Be subject to Education Code 41365 regarding the revolving loan fund for charter schools.
8. Meet the requirements of Education Code 47611 regarding the State Teachers' Retirement System.
9. Meet all statewide standards and conduct the student assessments required by Education Code 60605 and any other statewide standards or student assessments applicable to non-charter public schools and certify that their students have participated in the state testing programs specified in Education Code 60600-60652 in the same manner as other students attending public schools.
10. Be subject to state law prohibitions regarding employment, such that it may not hire any person, in either a certificated or classified position, who has been convicted of a violent or serious felony, and may not retain in employment any temporary, substitute, or probationary employee who has been convicted of a violent or serious felony.
11. Offer, at a minimum, the same number of instructional minutes set forth in Education Code 46201 for the appropriate grade levels.
12. Meet the requirements of Education Code 51745-51749.3 if providing non-classroom based instruction to any pupils.
13. Identify and report to the Superintendent of Public Instruction any portion of its average daily attendance that is generated through non-classroom based instruction, including but not limited to independent study, home study, work study, and distance and computer-based education (Education Code 47612.5, 47634.2)
14. Meet all the requirements contained in Government Code 3540-3549.3 related to collective bargaining in public education employment. If a charter does not

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specify that the charter school shall comply with laws and regulations governing tenure or a merit or civil service system, the scope of representation for that charter school shall also include discipline and dismissal of charter school employees.

15. Only hire teachers who 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. These documents shall be maintained on file at the charter school and shall be subject to periodic inspection by the Superintendent or designee.
16. Require its teachers of core subjects to satisfy requirements for "highly qualified teachers" as defined by the State Board of Education and meet said requirements for qualifications of paraprofessionals working in programs supported by Title I funds. (20 USC 6319)
17. Serve students with disabilities in the same manner as such students are served in other public schools.
18. On a regular basis, consult with parents/guardians and teachers regarding the school's educational programs.
19. Promptly respond to all reasonable inquiries from the Board or the Superintendent of Public Instruction, including but not limited to inquiries regarding its financial records.
20. Maintain written contemporaneous records that document all student attendance and shall make these records available for audit and inspection.
21. If a student subject to compulsory full-time education is expelled or leaves the charter school without graduating or completing the school year for any reason, notify the Superintendent of the school district of the student's last known address within 30 days and, upon request, provide that district with a copy of the student's cumulative record, including a transcript of grades or report card, and health information (Education Code 47605)
22. Comply with the California Building Standards Code as adopted and enforced by the local building enforcement agency with jurisdiction over the area in which the charter school is located, unless the charter school facility meets either of the following conditions: (Education Code 47610, 47610.5)

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- a. The facility complies with the Field Act pursuant to Education Code 17280-17317 and 17365-17374.
 - b. The facility is exclusively owned or controlled by an entity that is not subject to the California Building Standards Code, including, but not limited to, the federal government.
23. The charter school shall annually prepare and submit financial reports to the Board and the County Superintendent of Schools in accordance with the following reporting cycle:
- a. By July 1, a preliminary budget for the current fiscal year. For a charter school in its first year of operation, financial statements submitted with the charter petition pursuant to Education Code 47605(g) will satisfy this requirement. (Education Code 47604.33)
 - b. By December 15, an interim financial report for the current fiscal year reflecting changes through October 31. (Education Code 47604.33)
 - c. By March 15, a second interim financial report for the current fiscal year reflecting changes through January 31. (Education Code 47604.33)
 - d. By September 15, a final unedited report for the full prior year. The report submitted to the Board shall include an annual statement of all the charter school's receipts and expenditures for the preceding fiscal year. (Education Code 42100, 47604.33)
 - e. By December 15, a copy of the charter school's annual, independent financial audit report for the preceding fiscal year, unless the charter school's audit is encompassed in the district's audit. The audit report shall also be submitted to the state Controller and the California Department of Education. (Education Code 47605)
- H. Financial Relationship
1. The District may charge for the actual costs of supervisory oversight of a charter school not to exceed one percent of the charter school's revenue. If the District is able to provide substantially rent-free facilities to the charter school, the District

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may charge actual costs up to three percent of the charter school's revenue for supervisory oversight.

2. The charter school may separately purchase administrative or other services from the District or any other source.
3. At the request of a charter school, the Superintendent or designee shall create and submit any reports required by the State Teachers' Retirement System and the Public Employees' Retirement System on behalf of the charter school. The charter school may be charged for the actual costs of the reporting services, but shall not be required to purchase payroll processing services from the district as a condition for creating and submitting these reports. (Education Code 47611.3)
4. Pursuant to Education Code Section 41365, if a charter school defaults on a loan made directly to the school through the revolving loan fund, the charter school shall be solely liable for repayment of the loan.

I. Employer-Employee Relationship

If the charter school is not deemed the exclusive public school employer of the charter school employees for purposes of Government Code Section 3540.1, the District shall be deemed the employer for those purposes. If the District is deemed the exclusive employer of the charter school's employees, such employees would not become members of any District employee associations without formal recognition of such membership of the Public Employment Relations Board.

Legal References: Education Code, Sections 47600-47616.5

Rules Approved: 06/27/2000

Rules Revised: 09/10/2002; 06/22/2010; 08/20/2015

(Formerly AR 6138)

From: Kelly King <kking@gusd.net>
Date: September 14, 2015 at 1:13:33 PM PDT
To: Gillian Bonacci <gsharp1@pacbell.net>
Cc: Robert McEntire <rmcentire@gusd.net>, Dave Calvo <dcalvo@academi-ca.org>, Hilary Stern <hilary_stern@hotmail.com>
Subject: Re: Ready Soon to Submit Petition

You'd submit during public communication. One copy and one electronic copy. Then we have 30 days to schedule the public hearing

Sent from my iPhone

On Sep 14, 2015, at 12:47 PM, Gillian Bonacci <gsharp1@pacbell.net> wrote:

Hi Dr. King,

I just want to check in with you about the submission of the charter petition. We are, more or less, ready to submit. (Oct 6th not tomorrow.) However, in looking at your new Charter School AR we need a clarification.

Per your new AR policy, "submission and receipt of a petition means the date of presentation of the petition to the board **at a public meeting**," then it goes on to say, "within 30 days of receiving a complete petition to establish a charter school, the Board shall hold a public hearing on the proposed charter. ... The petition[er] may be asked to make a brief presentation to the board at this time."

We would like to just make sure that no presentation is expected at the first meeting when the petition is first submitted. Did you want printed copies (if so, how many) and a digital file?

Thanks.

gillian

From: "Dr. Armina Gharpetian" <agharpetian@gusd.net> **Subject:** Re: coffee?

Date: December 10, 2015 at 8:04:04 AM PST **To:** Gillian Bonacci <gsharp1@pacbell.net>

Hi Gillian,

Hope all is well. Unfortunately I am extremely busy this week and won't be able to meet. However, I want to assure you that after getting the report from the staff, I will ask for clarifications if anything seems unclear.

Thank you again for your passion in education and your dedication to the FLAG programs.

See you on Tuesday!

Armina

Armina
Dr. Armina Gharpetian
Board of Education, Vice President Glendale
Unified School District

On Dec 8, 2015, at 2:02 PM, Gillian Bonacci <gsharp1@pacbell.net> wrote:

Hi Armina,

I would like to extend again, my offer to meet with you to answer any questions you might have about our petition for a charter school. I know you've read the petition so I can only imagine that you have more questions since the public hearing.

Please let me know if you have any time to meet this week. I can make myself available.

Regards,

gillian Bonacci CoLead
Petitioner ISLA

On Nov 12, 2015, at 3:17 PM, Dr. Armina Gharpetian <agharpetian@gusd.net> wrote:

Hi Gillian,

Thank you for your email and sorry for the late response.

If you don't mind, I would like to suggest that we wait until the Public Hearing (on Nov 17th) before we meet.

This will certainly allow us to keep the process as transparent and fair as possible. I am certain that the Public Hearing will allow everyone to have an open dialogue and give us a chance to hear all the view points.

Thank you for your understanding and see you on the 17th.

Armina

Dr. Armina Gharpetian
Board of Education, Vice President Glendale
Unified School District

On Nov 6, 2015, at 10:50 AM, Gillian Bonacci <gsharp1@pacbell.net> wrote:

Hi Armina,

I was a little concerned to hear Dr. Shawn suggest to the board the other night to not worry about understanding the 16 Elements in the Charter petition because the Administrative team will evaluate the petition and recommend which way to vote. As an elected representative of the people you have a responsibility to do your due diligence in order to make an informed decision about the charter and be informed about both sides of the issue, not just one point of view. After all, the board will be held accountable for their vote, not the Administrative team who have a motive to deny, but who are not accountable to the public.

In order to better understand my responsibilities as the chair of the ISLA board, I have been trained in the Brown Act. I know that you and I can meet and have a two-way discussion about the charter. I can help answer any questions you might have so that you can have an informed, from both sides, opinion about the charter. I've heard it asked, why does Glendale need a charter? I can answer that question for you, from our perspective. Don't you think it's important to understand all perspectives?

Can we meet for coffee in the next couple of days, whenever is convenient?

Sincerely,

gillian Bonacci [818-730-4413](tel:818-730-4413)

From: Greg Krikorian <gkrikorian@gusd.net> **Subject:**
Re: coffee?
Date: November 10, 2015 at 3:48:02 PM PST
To: Gillian Bonacci <gsharp1@pacbell.net>

Gillian

It's always a pleasure speaking with you. I left you a VM and I feel it's better to hear all of the information on the 17th.

You are more than welcome to email me your thoughts and vision etc

Best

Greg

Sent from my iPhone

On Nov 9, 2015, at 8:30 PM, Gillian Bonacci <gsharp1@pacbell.net> wrote:

I can meet Wednesday morning, if you can.

gillian
818-730-4413

On Nov 7, 2015, at 5:31 PM, Greg Krikorian <GKrikorian@gusd.net> wrote:

Gillian

I apologize for the delay in getting back to you. I'm out of town this weekend and I appreciate you sharing your thoughts with me. I'm back on Tuesday

Best

Greg

Sent from my iPhone

On Nov 5, 2015, at 1:41 PM, Gillian Bonacci <gsharp1@pacbell.net> wrote:

Hi Greg

I hope your son had a happy birthday!

I was a little concerned to hear Dr. Shawn suggest to the board the other night to not worry about understanding the 16 Elements in the petition because the Administrative team will evaluate the petition and recommend which way to vote. As an elected representative of the people, you have a responsibility to do your due diligence in order to make an informed decision about the charter and be informed about both sides of the issue, not just one point of view. After all, the board will be held accountable for their vote, not the Administrative team who have a motive to deny, but who are not accountable to the public.

In order to better understand my responsibilities as the chair of the ISLA board, I have been trained in the Brown Act. I know that you and I can meet and have a two-way discussion about the charter. I can help answer any questions you might have so that you can have an informed, from both sides, opinion about the charter. I've heard you say publicly that you don't understand why Glendale needs a charter. I can answer that question for you, from our perspective. Don't you think it's important to understand all perspectives?

Can we meet for coffee at the bakery in Kenneth Village or the restaurant near your office in the next couple of days, whenever is convenient? Sincerely, Gillian Bonacci 818-730-4413

Begin forwarded message:

From: Greg Krikorian <gkrikorian@gusd.net> **Subject:**
Re: coffee?
Date: November 7, 2015 at 5:31:26 PM PST
To: Gillian Bonacci <gsharp1@pacbell.net>

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From: Jennifer Freemon <jfreemon@gusd.net>
Subject: Re: FLAG and ISLA
Date: December 10, 2015 at 11:03:44 AM PST
To: Gillian Bonacci <internationalstudiesla@gmail.com>

Gillian and the ISLA Board of Directors,

Rather than leaving only the sound of crickets chirping in the wake of your carefully crafted message, I would like you to know I received it, read it, and am carefully considering the petition before me. The process, as you know does not allow for much in terms of email discussion, but I don't want you to feel as though you are being ignored.

Jennifer Freemon

On Wed, Dec 9, 2015 at 9:36 AM, Gillian Bonacci <internationalstudiesla@gmail.com> wrote:
To Members of the Glendale Unified School District:

The International Studies Language Academy (ISLA) team is comprised of parents who tirelessly collaborated with GUSD during the past six years, to support and build the FLAG program into what it is today. Throughout this time, we have been concerned that without a strong middle school option for French, Italian, and German, those elementary school programs will begin to attract fewer students. We know by the number of families that support this effort that many chose the FLAG program as a long term goal for true bi literacy and cultural sensitivity. We strongly feel that diluting it at middle school would affect those families' choice to begin it at all.

School Choice has transformed education in Glendale. Student data from Clark Magnet and the FLAG program clearly demonstrate that public school choice has increased achievement, elementary school enrollment and has helped to retain Glendale neighborhood students who, in the case of Clark Magnet, were leaving for high school options outside of GUSD. ISLA was designed to work *with* the District FLAG program and not compete with it. It's success will be achieved when the French, Italian and German programs have an immersion option for middle school for those students who wish to continue with a focus on foreign language instruction and both Franklin and ISLA are filling their waiting lists for students. We know this model works but it is currently working only for the rare few who are chosen by lottery. We have offered to collaborate with the District on lottery dates as to minimize the number of student we are pulling away from Glendale. Furthermore, such a relationship would benefit GUSD with shared resources and curriculum, demographics, enrollment, and achievement metrics. As families who are dedicated to the FLAG program, our vision for the future of FLAG and ISLA is that our shared community would be strengthened by our cooperation and all students would benefit from that.

Truly, the question before you is what level of participation does GUSD wish to have with ISLA located in your community? The California Charter Schools Act compels that "a school district governing board shall grant a charter for the operation of a school under this part if it is satisfied that granting the charter is consistent with sound educational practice." ISLA's Petition has more than adequately addressed all of the required elements and therefore merits approval. Keep in mind, it is the *intent* of the Legislature, in enacting the California Charter Schools Act to "provide teachers, parents, pupils, and community members with expanded choices in the types of educational opportunities that are available within the public school system."

Should you have any questions or concerns, we welcome the opportunity to discuss them with you. We are available to have discussions with you in a manner that is compliant with the Brown Act, including the serial meeting provision.

Sincerely,

ISLA Board of Directors



250 East 1st Street, Suite 1000 • Los Angeles, CA 90012 • p 213-244-1446 • f 213-244-1448 • www.calcharters.org

November 16, 2015

Board of Education and Office of the Superintendent
Glendale Unified School District
223 North Jackson Street
Glendale, CA 91206

RE: Support for Authorization of International Studies Language Academy (ISLA)

Dear Honorable School Board Members and Office of the Superintendent,

The California Charter Schools Association (CCSA) is a statewide non-profit advocacy organization that supports high-quality charter schools in California. Part of our mission is to support our members in opening and operating high-quality charter public schools that are reflective of California's student population. To that end, I am writing to express CCSA's support of the petition for International Studies Language Academy, which we hope will be approved by the Glendale Unified School District Board of Education on Tuesday, December 15.

ISLA, a proposed K-8 charter public school that couples a language immersion experience with high academic rigor, will prepare students to be global stewards and critical thinkers, ready to take on the challenges of an ever-changing world. The ISLA charter petition will provide another high quality school option for Glendale families and will offer choice to parents and students who are waitlisted for the district's language immersion program.

CCSA, along with this petitioner team, is hopeful for the opportunity to partner with the Glendale Unified School District. In the spirit of collaboration, we respectfully request that the district staff and board members engage in an open dialogue with this team regarding concerns and desired changes to the proposal, to build the foundation for a long-lasting, local partnership that provides another high-quality public school option for Glendale families.

We believe in ISLA's curricular model, which will offer a small learning community, a strong emphasis on global citizenship, and a commitment to social consciousness. Furthermore, the petitioners have proven their commitment to education, especially in the Glendale community. This is a hard-working, dedicated team. We are confident in their ability and capacity to successfully implement this program.

For the reasons stated above, we strongly urge the approval of the ISLA charter petition by your honorable board. If you have any questions, please do not hesitate to contact me directly at (617) 309-9296.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clayton Rosa', with a long horizontal flourish extending to the right.

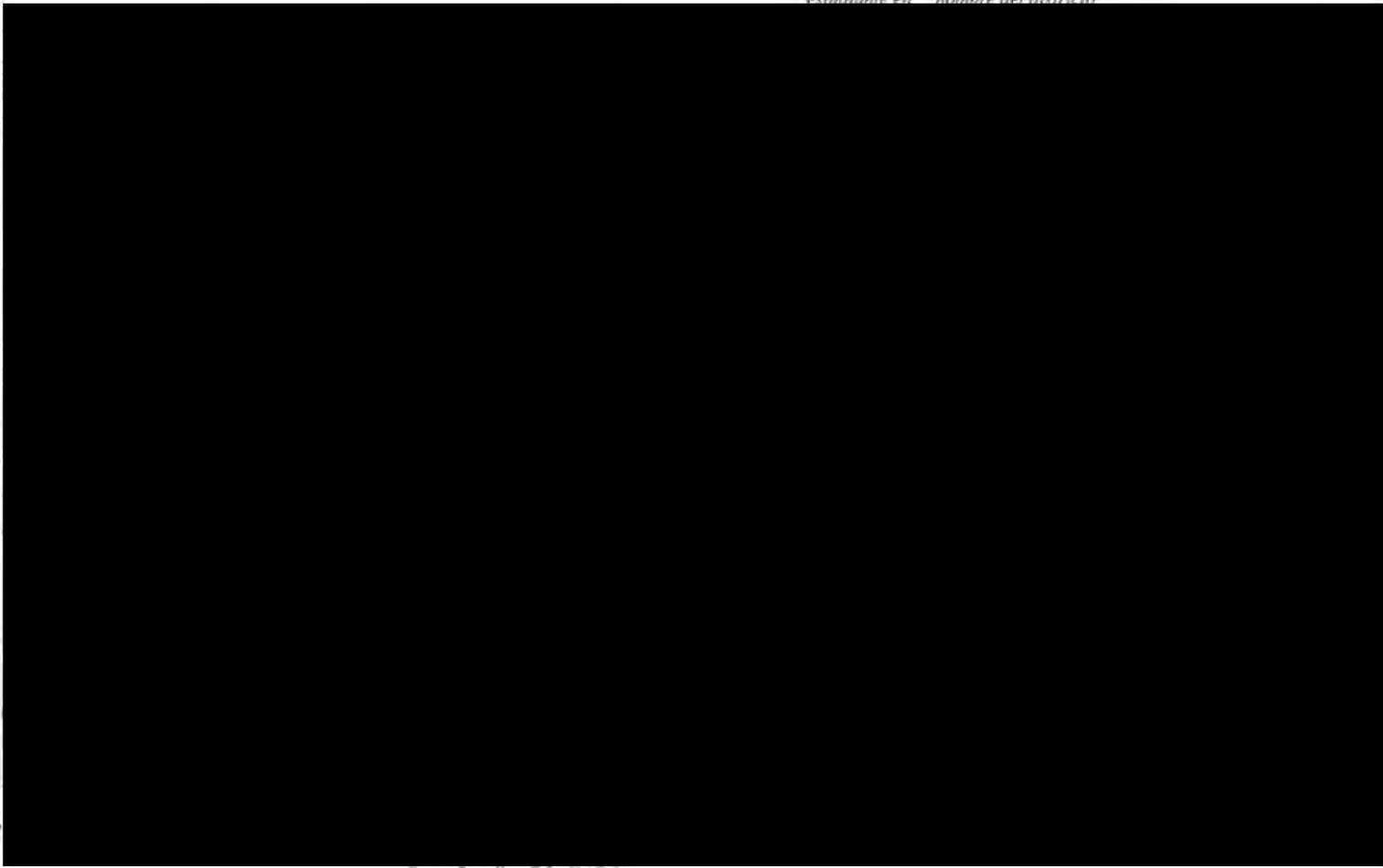
Clayton Rosa
Director, Regional Advocacy – Greater Los Angeles
California Charter Schools Association
250 East 1st Street, Suite 1000, Los Angeles, CA 90012
croso@calcharters.org | (617) 309-9296

Cc: Christine Walters, President, GUSD Board of Education
Dr. Armina Gharpetian, Vice President, GUSD Board of Education
Nayiri Nahabedian, Clerk, GUSD Board of Education
Gregory Krikorian, Member, GUSD Board of Education
Jennifer Freemon, Member, GUSD Board of Education
Marianna Yolyan, Student Board Member, GUSD Board of Education
Dr. Joel Shawn, Interim Superintendent of Schools, GUSD Board of Education
Dr. Marc Winger, Interim Superintendent of Schools, GUSD Board of Education

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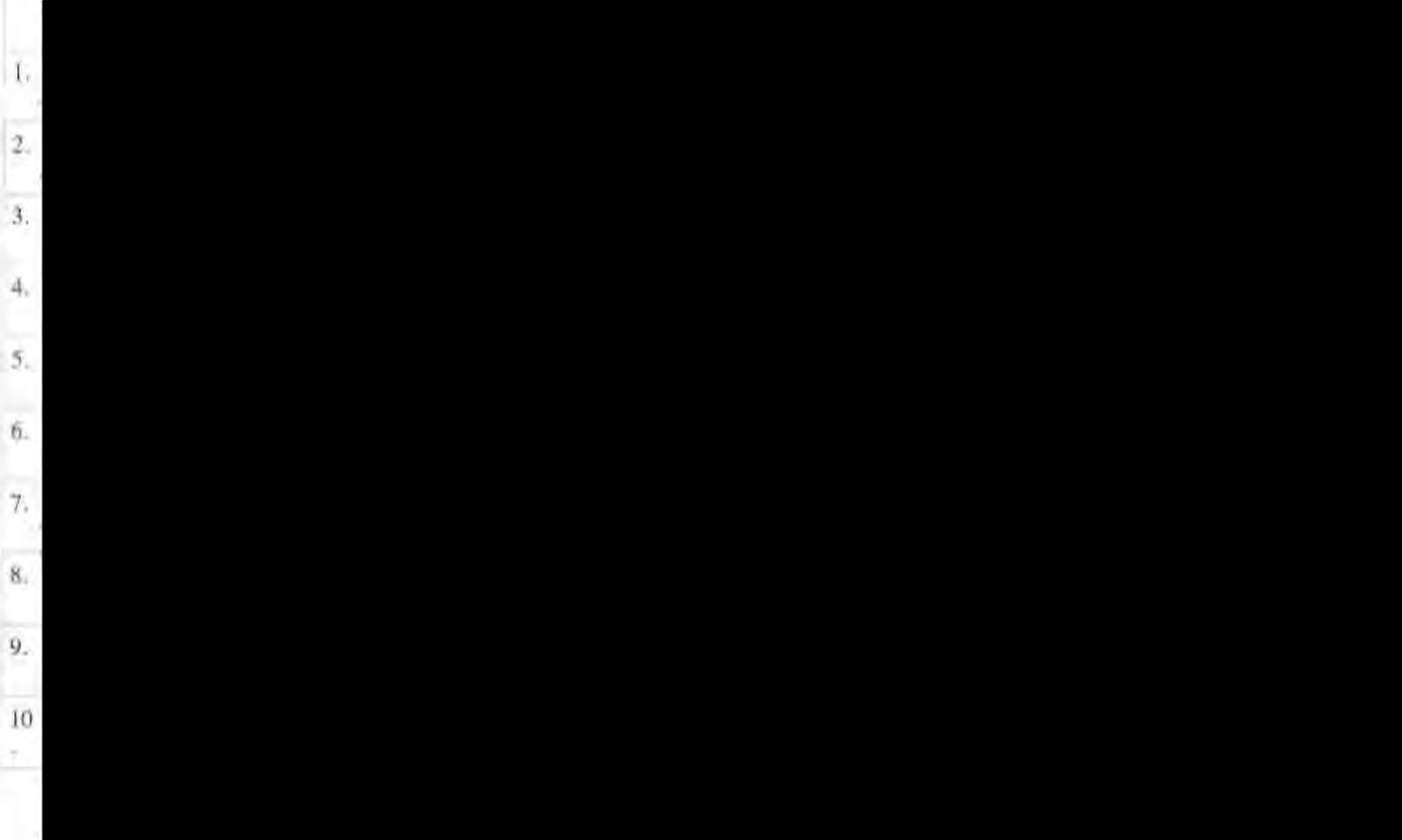
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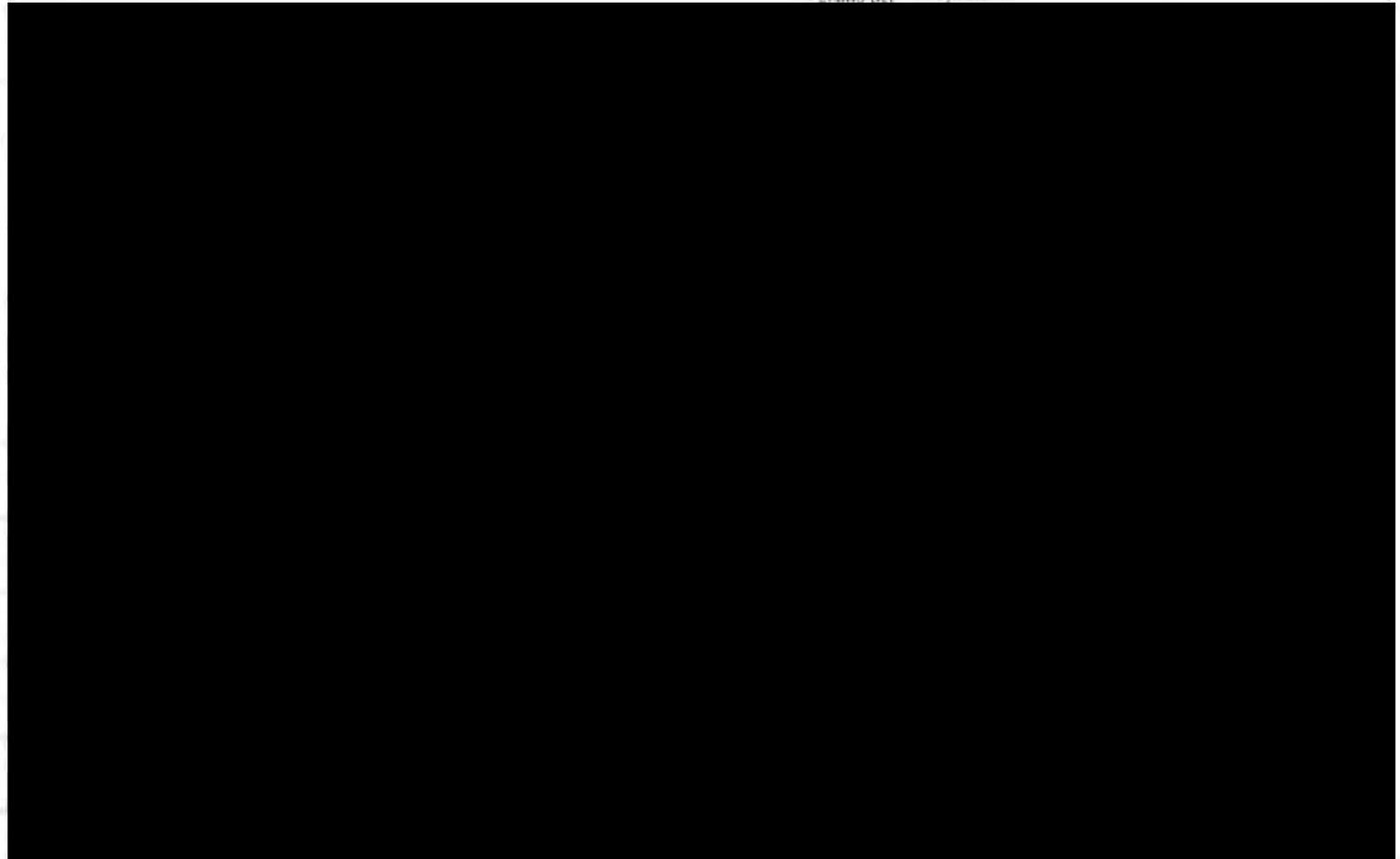
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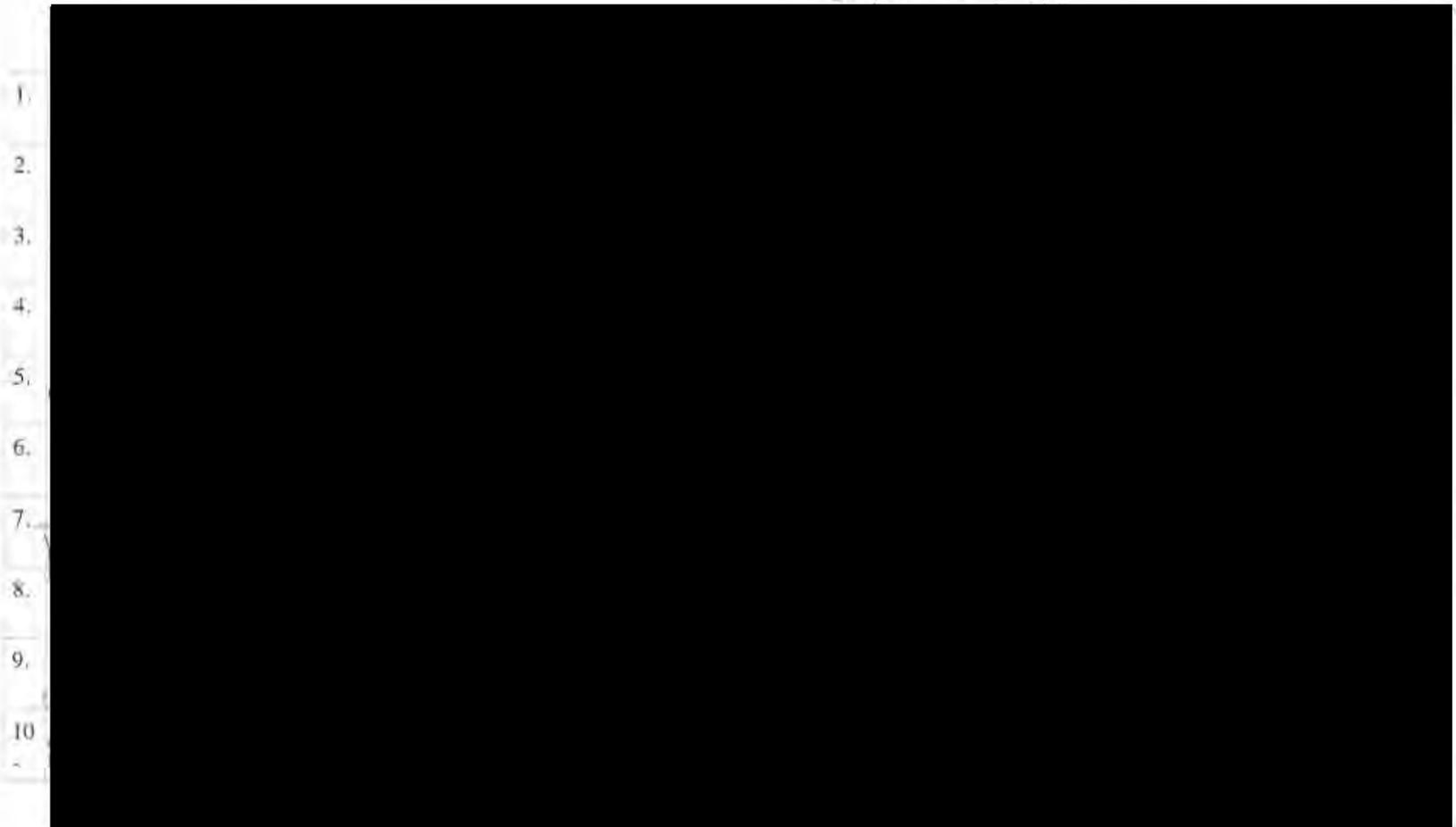


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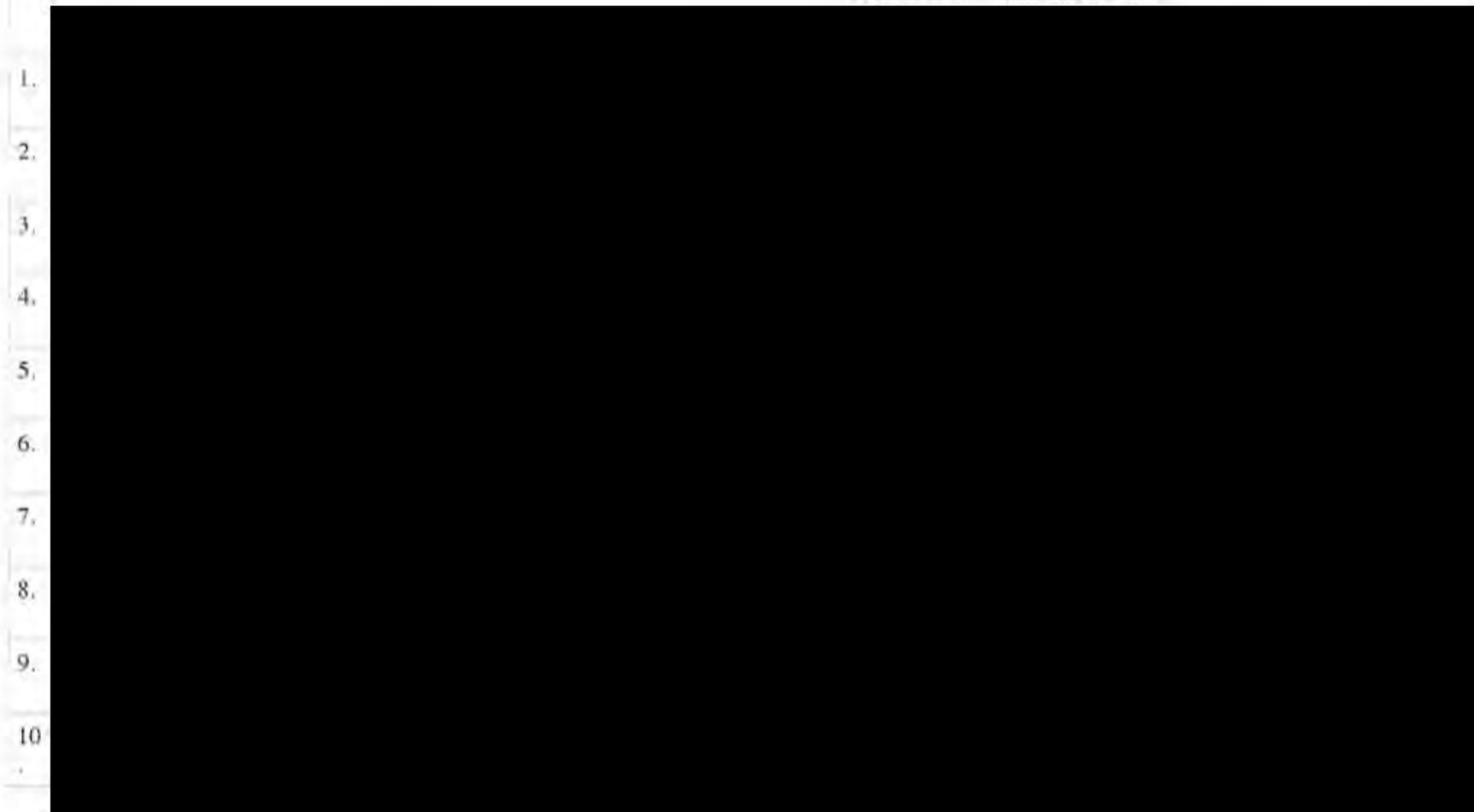
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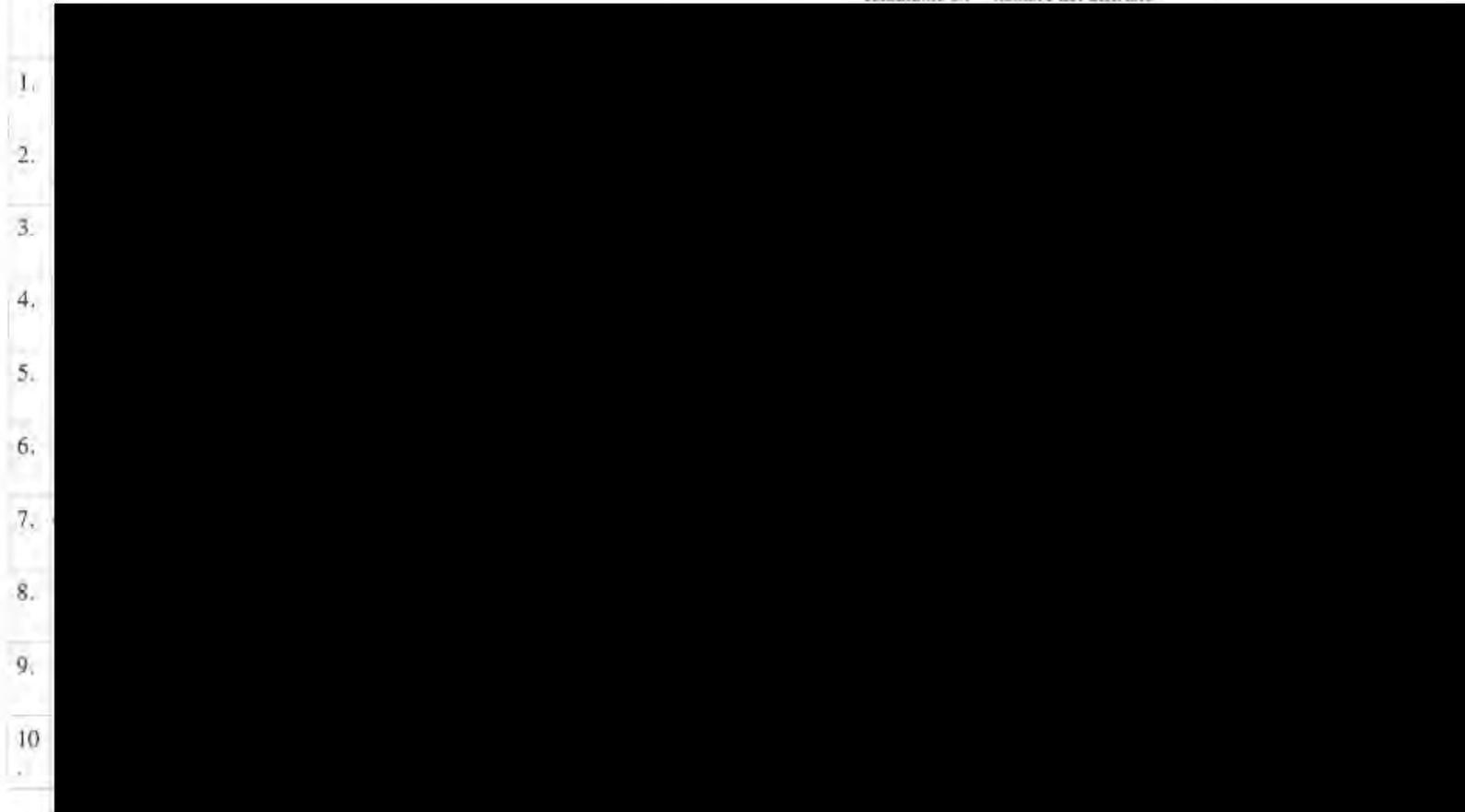
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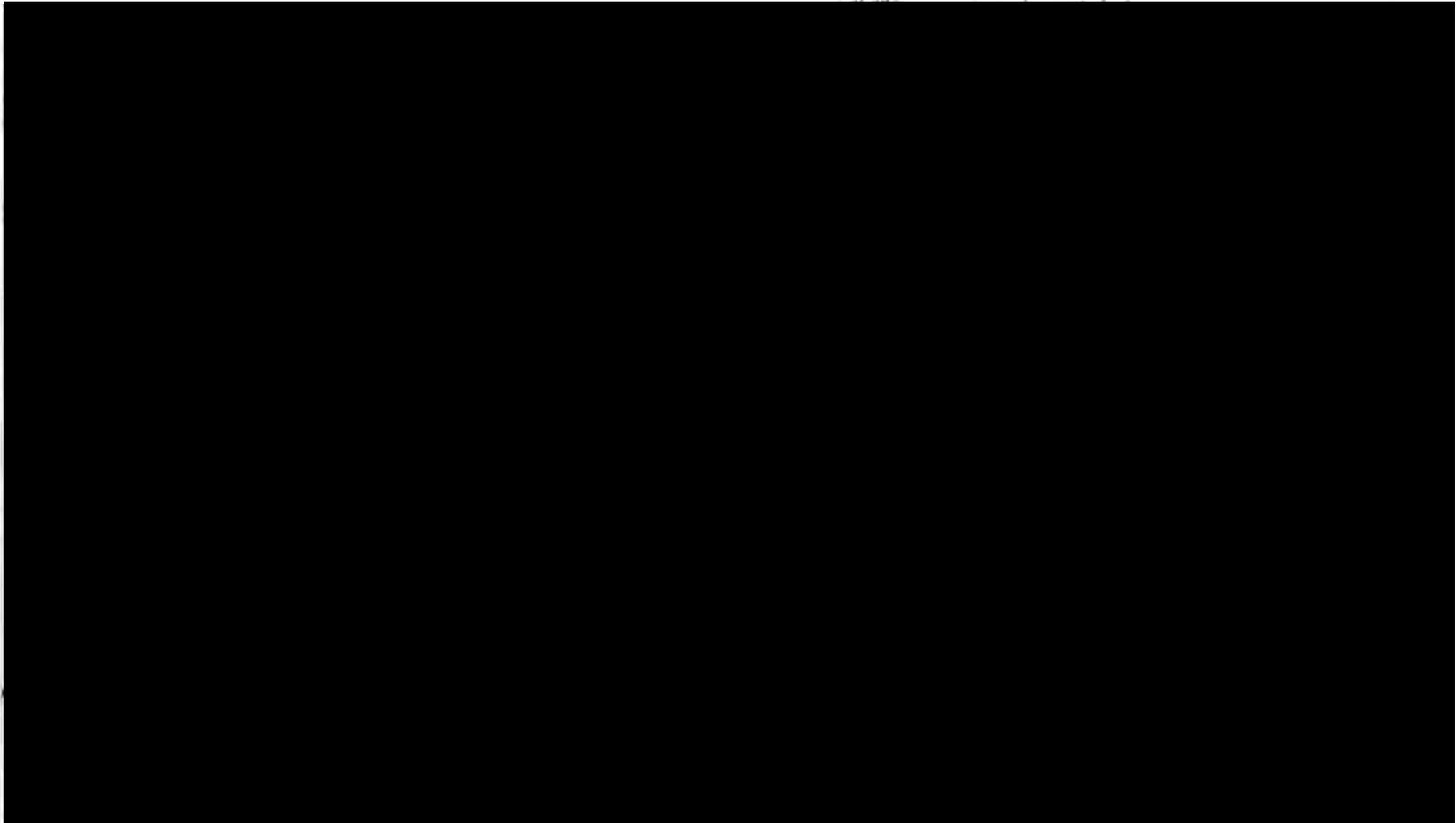
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Franklin Advisory Meeting Update May 1, 2014.

Parent Survey Results from Kathryn Lindholm Leary presented

Purchases/Budget: Franklin has bought many books for classroom libraries and school library (even for future classes), laptops, LCD projectors, document cameras, 11 SMART Boards, iPads, 2 copiers, 1 portable SMART Boards, pencil sharpeners, printers. Next year we will not be Title I and the Magnet Grant will end.

Sustainability Plan: Written. Financial future support will come from general district funds and the BFEF (Foundation) and any possible school funds as well as grants (Fondazione Italia, German Consulate, etc.). Teachers will train other teachers.

German Test: Deutsches Sprachdiplom (German Language Certificate) **A1 & A2 (recognized by the European union):** All students at Franklin grades 2-5 that took the A-1 test passed it. The 4/5 grade class completed the A-2 test and 12 students passed. Certificates of recognition will be handed out by the German Government May 15 in the auditorium.

Application for School of the Year (International Spanish Academies):
Application was submitted at the end of March.

Fondazione Italia Grant: grant has been written and submitted. We have always received much support from this organization. @ #18K

Amity Interns- We have 11 this year. For 2014-15: 5 from Spain have been selected. Still need host families.

\$1M urban greening grant: made it to the last round. There were 188 concept submissions, 75 applications, 55 site visits and they estimate approximately 35 awards will be made. We had our site visit last month and will learn if we are to be awarded on May 26th. The district, Dr. Sheehan, Alan Reising and Dr. King were involved and very supportive.

The Big Bad Voodoo Daddy concert, in conjunction with Verdugo Woodlands, was a huge success! We raised over \$23,000

Silent Auction brought in another \$43,000!

Barnes and Noble Book Fair: ~\$472.00 was raised and Principal's Book Club continues.

Inaugural Science Fair: We had judges from JPL and Caltech. Over 100

students participated, 76 were from Primary Grades and 42 from Upper Grades. All languages participated and some projects were submitted in the target language.

The LA Dodgers donated 100 tickets to Franklin for Teacher/Intern appreciation.

Math Field Day: several students received group awards

Construction: Franklin will be under construction next school year. Bungalows are beginning to be dropped off.

Lottery: We received 726 total applications to date; 493 students. Each language had over 100 applicants; Spanish had almost 300. We will still be filling grades 1-6 for all languages, depending on space.

Curriculum: The German, Italian and French curriculum was written this year and completely aligned to the Common Core standards by Dr. Simona Montanari and the staff. THIS is the curriculum that will be used at Franklin if adopted and approved by the Board of Education in May.

Core Books: Italian Core books were approved in 2012-13. The German and French Core books (grades k-6) are up for Board Approval in May.

ATDLE Conference: Monica Bennett and Valerie Sun will be presenting at the Dual Immersion Conference in Sacramento June 23-26! Thank you! (Topic: Technology in the Dual Immersion Classes)

Worldfest: This Saturday, May 3. 11 AM. Join the fun.

Franklin Magnet Advisory Co. Meeting
Minutes for March 27, 2014
7:15 AM in Conference Room

Attending: Alisa Tager, Nicole Peineke, Gillian Bonacci, Ana Jones, Vickie Atikian, Jessica Zavala

- I. Welcome and Introductions
- II. Review of Minutes
- III. Visit by state dept. and Spanish Consulate and application for ISA School of the Year: Ana mentioned that we wrote an application for ISA School of the Year. We needed a letter of recommendation from the state so she reached out to Rosario Outes who then connected her with Fernando Rodriguez-Valls who decided to come for a visit on 3/24. He had to cancel due to illness, however, did write a letter and will be rescheduling a visit. Kathryn Lindholm Leary also gave a great letter of recommendation. The application was mailed yesterday.
- IV. Greening grant news - Gillian - Gillian mentioned that we have a site visit today. We are hoping to get this grant. LAUSD is going to have to give their awards back due to some problems. Ana thanked Gillian and Hilary for the work that they did and continue to do.
- V. Italian grant being written (Ana and Vickie) - The grant is almost completed and will be submitted in the near future. We are hoping to get funds to continue to support additional personnel to help out the programs.
- VI. Fund raisers: Big Bad Voodoo Daddy, silent auction- Gillian mentioned that we got \$23,711.44 from Big Bad Voodoo Daddy fundraiser. We are very happy with that! The Silent Auction is in full swing and currently online. All so far is free: the venue, food, drinks etc. Money will be spent on printing. Lexus of Glendale donated the auction software which is amazing. They want to have fewer things at the auction and more on the online auction.
- VII. Tours: doing a few last minute ones - Ana mentioned that though most families that got in took tours, there are still a few

that did not. Tours are being provided for those. Ana also provides tours to families that say that they are thinking of moving into the district if possible. (There are lots of conflicts: teachers on collaboration, conferences, trainings, field trips etc. which make it more difficult to coordinate tours.) Vickie mentioned that new parents come to Open House and that the teachers feel that it is disruptive. Ana stated that she only told two families but that many see it on the calendar and think it is open for them. Discussion took place about renaming Open House. "Open House" sounds like it is open for all. Gillian mentioned that we should give them the opportunity to come in and look so they do not hold the spot all summer long. Nicole mentioned that maybe the first few minutes could be for new incoming parents. Maybe it could be clarified on the calendar. Ana mentioned that some of the people that got in are not first choice. Gillian mentioned that it may solidify their opinion to come. Alisa mentioned that maybe there should be a handout for the new families saying that they cannot speak English. Vickie mentioned that maybe we do a welcome wagon at the end of this year.

- VIII. Lottery numbers/ Lottery: Ana mentioned that Franklin got a total of over 700 applications. Not all were on time. Overall, Spanish had 282 applicants (even though after Ana found out the large number of siblings she encouraged on her tours applications to Edison and Muir for Spanish as they are excellent schools), French had 187 total, German 102 total and Italian 122 total. There were many more students to test. In French we have 12 language dominant kinder students incoming (2014-15). In German there are 10 language dominant students in kinder, in Italian there will be 9 language dominant and in Spanish there are approximately 11 siblings that know Spanish language. Enrollment packets are mostly picked up and many have been returned.
- IX. Amity interns – Interviews are taking place for interns for 2014-15. We do need hosts for ALL languages or we will not be able to have them come. They have been of great help at school and we are very grateful for the host families. Gillian mentioned that we are filling 13 spaces for the interns. The German so far are all half-year interns. We are being very

selective about the interns. We for sure need German host families but we need hosts for all. Expectations about the interns were discussed. The interns are NOT nannies. They do have to attend English classes. The interns do like to go out after school with each other. Interns are hosting for the good of the school. The interns are not allowed to "take jobs away from Americans".

X. Magnet Grant News:

-Budget/orders- books have been ordered for all future classes and for the school library, computers were ordered, document cameras, etc

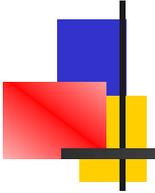
-Curriculum update- Dr. Simona Montanari is finishing the curriculum for Italian, French, and German to have it precisely aligned to CCSS. Ana is doing a write up on all three languages so that they will have the book lists as needed for the district. Books are coming in and being reviewed with the green cards. Hope is to have it all ready to send to the district ASAP to get it approved ASAP. It must be approved by principal's first and then it gets put on a Board agenda to get approved by the Board.

- Parent Surveys and teacher surveys were sent out. Kathryn Lindholm Leary compiles the information and will submit a report to the district regarding how parents feel about the program. This is part of the evaluation. Gillian mentioned that the question about if the child will be fluent by the end of the program...it should be specified as a 6th grader. Because they are looking into middle school...this question could be confusing to parents.

XI. Parent input/ needs:

Nicole asked if about the supplies for the class. Gillian mentioned that teachers get \$350 from the Foundation for supplies and \$600.00 if they are new.

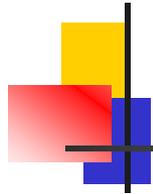
Meeting ended at 8:40 AM



Enrollment Impact Analysis

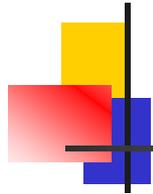
**Glendale Unified School District Board Meeting – October 20, 2015
Discussion Report No. 2**

Robert McEntire
Chief Business and Financial Officer



GUSD Enrollment

- Enrollment – Historical Trend
- Efforts to Stabilize/Increase Enrollments
- Students Transferred
- TK-3 Class Size

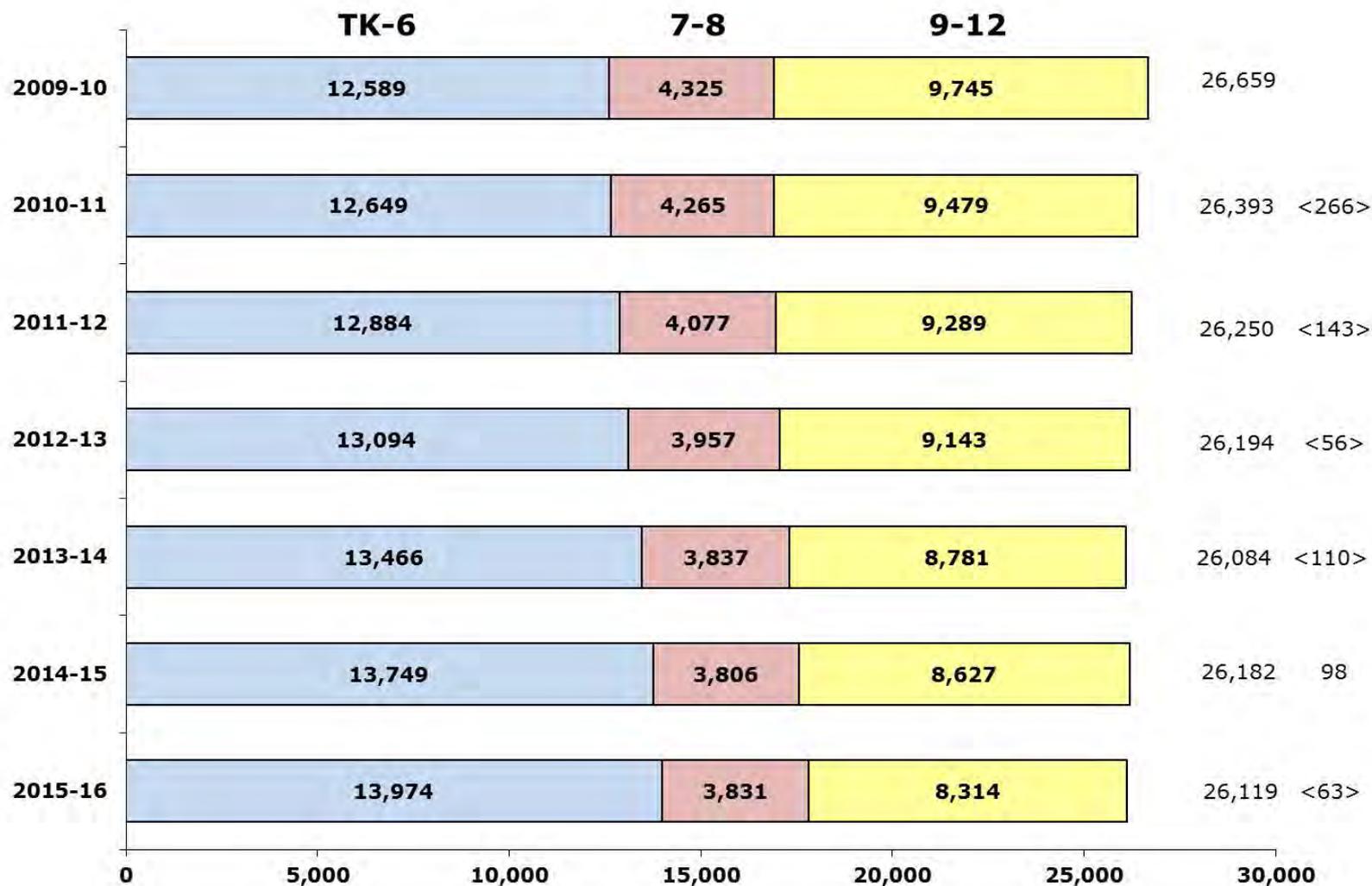


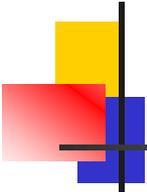
GUSD Enrollment

- Enrollment is Stabilizing
- Up 225 Students in Elementary ↑
- Down 288 Students in Secondary ↓

As students progress up into Secondary, enrollment should gradually increase in future years.

Historical Enrollment (CALPADS Data)

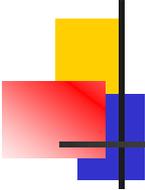




Efforts to Stabilize/Increase Enrollment

Providing Programs that Attract/Retain Students

	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16
FLAG/Magnet Inter-District Permits	254	343	493	512	594	631
Other	459	396	364	366	348	426
TOTAL	713	739	857	878	942	1,057



GUSD Enrollment

Students Transferred

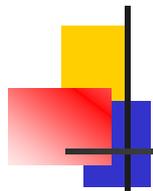
“Capped Out”

Students Moved from Their Home Schools

2010-11	108
2011-12	116
2012-13	128
2013-14	63
2014-15	77
2015-16	44

GUSD Enrollment

TK-3 Class Size – As of 10/15/2015



School	# of Teachers TK-3 (Includes one 3/4 Splits)	TK-3 Average	Space for Additional Students Based on 24 to 1 Average	# of SDC Mainstreaming
Balboa	20	23.8	4	
Cerritos	11	23.09	10	
Columbus	17	23.82	3	8
Dunsmore	12	23.17	10	2
Edison	22	23.5	11	
Franklin	18	23.61	7	
Fremont	16	23.13	14	
Glenoaks	14	22.86	16	13
Jefferson	16	23.44	9	

GUSD Enrollment

TK-3 Class Size (Cont.) – As of 10/15/2015

School	# of Teachers TK-3 (Includes one 3/4 Splits)	TK-3 Average	Space for Additional Students Based on 24 to 1 Average	# of SDC Mainstreaming
La Crescenta	12	22.83	14	
Lincoln	12	23.08	11	10
Mann	18	23.94	1	
Marshall	14	22.57	20	12
Monte Vista	20	22.8	24	
Mountain Ave	13	23.15	11	
Muir	23	23.87	3	
Valley View	10	23.3	7	
Verdugo Woodlands	21	22.86	24	
RD White	25	23.32	17	

Total # of Teachers

343

District Average TK-3

23.29

Glendale Unified School District Board of Education Special Meeting No. August 2013



Dual Immersion Programs

History of the Foreign Language Academies of Glendale (FLAG)

2003/2004:

GUSD approved the first FLAG program and 18 kindergarten students enrolled in the Spanish Dual Immersion Program at Edison Elementary School

2006/2007:

First Armenian Heritage class was opened at Jefferson Elementary

2007/2008:

Korean FLAG program began at Keppel Elementary School

2008/2009:

German FLAG program began at Franklin Elementary School

History of the Foreign Language Academies of Glendale (FLAG) cont...

2009/2010:

RD White Elementary School opened the first Armenian dual immersion program.
Italian FLAG was introduced at Franklin Elementary School.
Spanish FLAG was expanded to Franklin Elementary School.

2010/2011:

Jefferson began transitioning the Armenian Heritage program to a dual immersion program.
Japanese FLAG was introduced at Verdugo Woodlands Elementary School.
Korean FLAG was expanded to Monte Vista Elementary School.
Spanish FLAG students matriculated to Toll Middle School.

2011/2012:

Spanish FLAG was expanded to Muir Elementary School.

History of the Foreign Language Academies of Glendale (FLAG) cont...

2012/2013:

French FLAG was introduced at Franklin Elementary School.

Spanish FLAG students matriculated to Hoover High School.

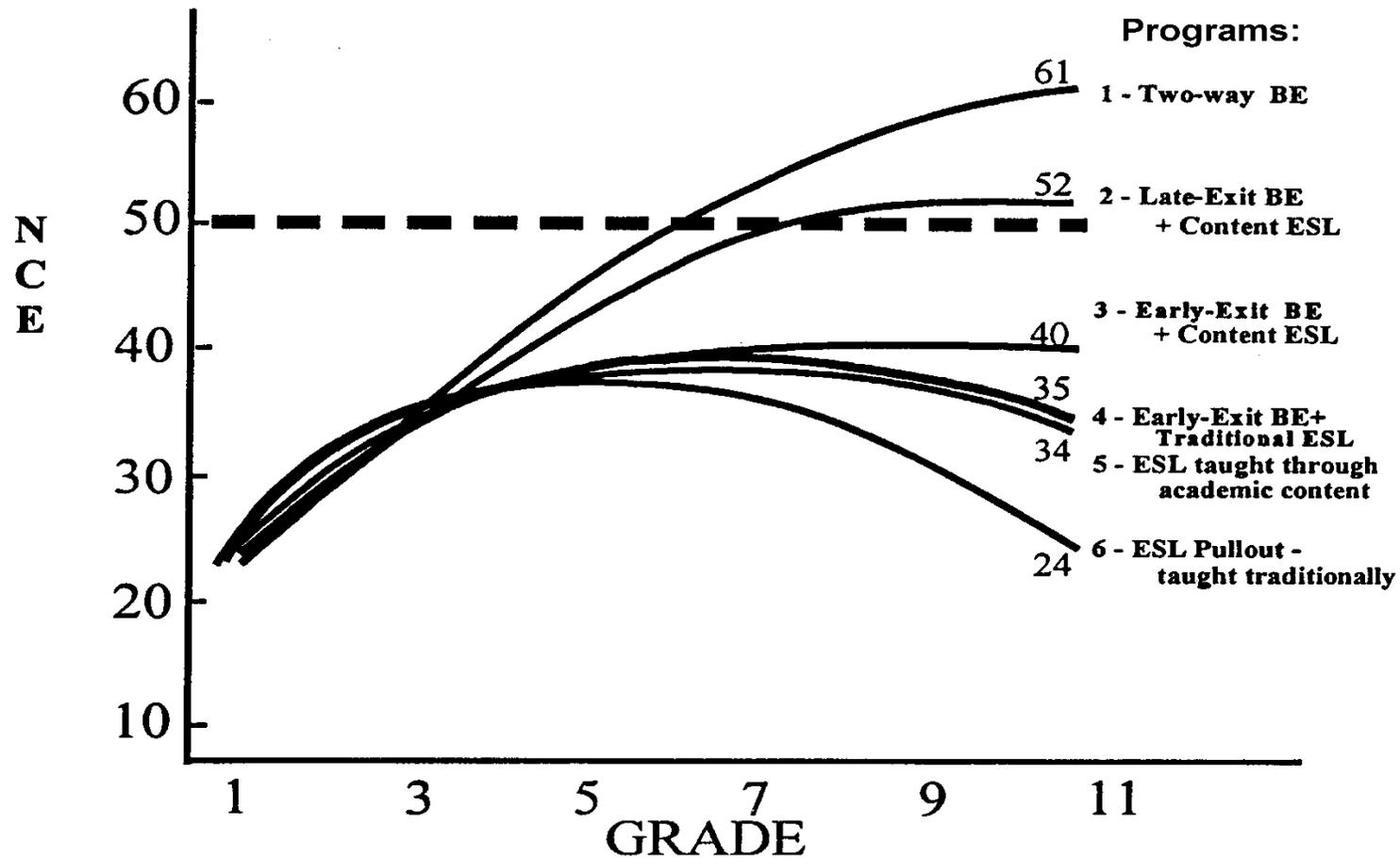
2013/2014:

Korean FLAG 6th grade students will matriculate to Toll Middle School.

Reasons for Dual Immersion in GUSD

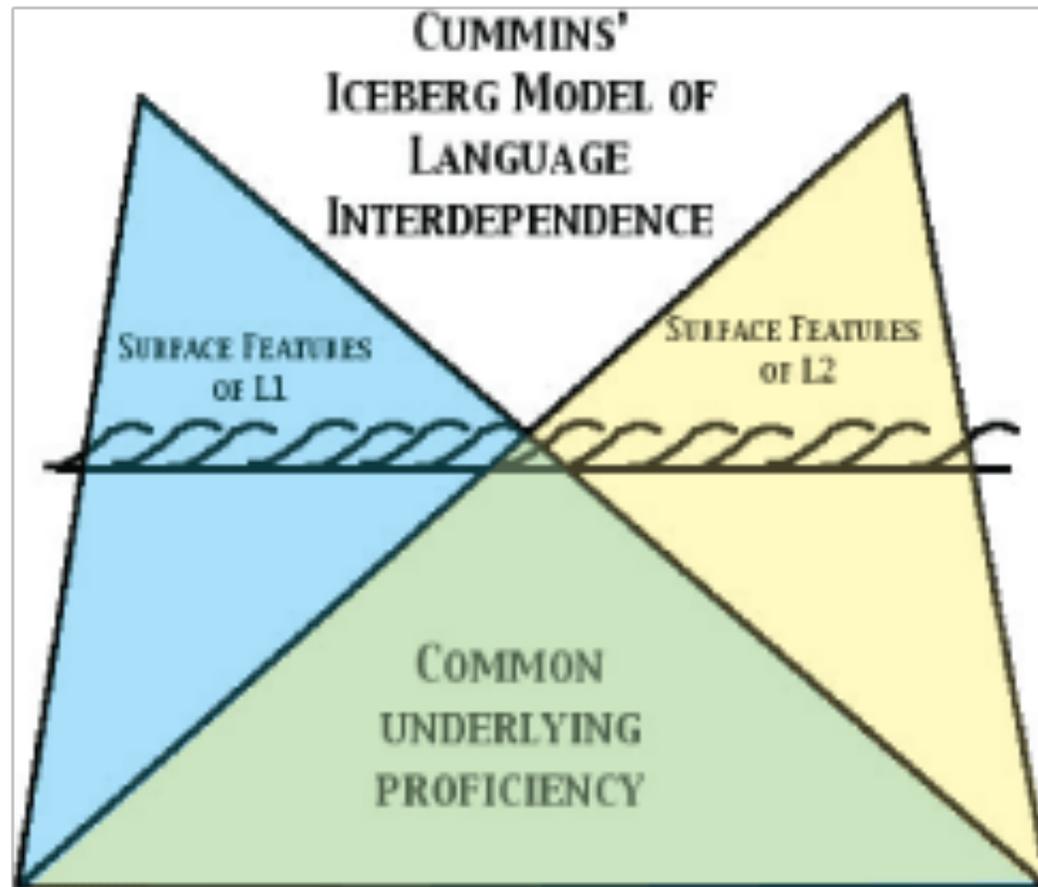
- Academic benefits to students
- As a response to declining enrollment

Academic Benefits of Dual Immersion for English Learners



Collier and Thomas, 1997

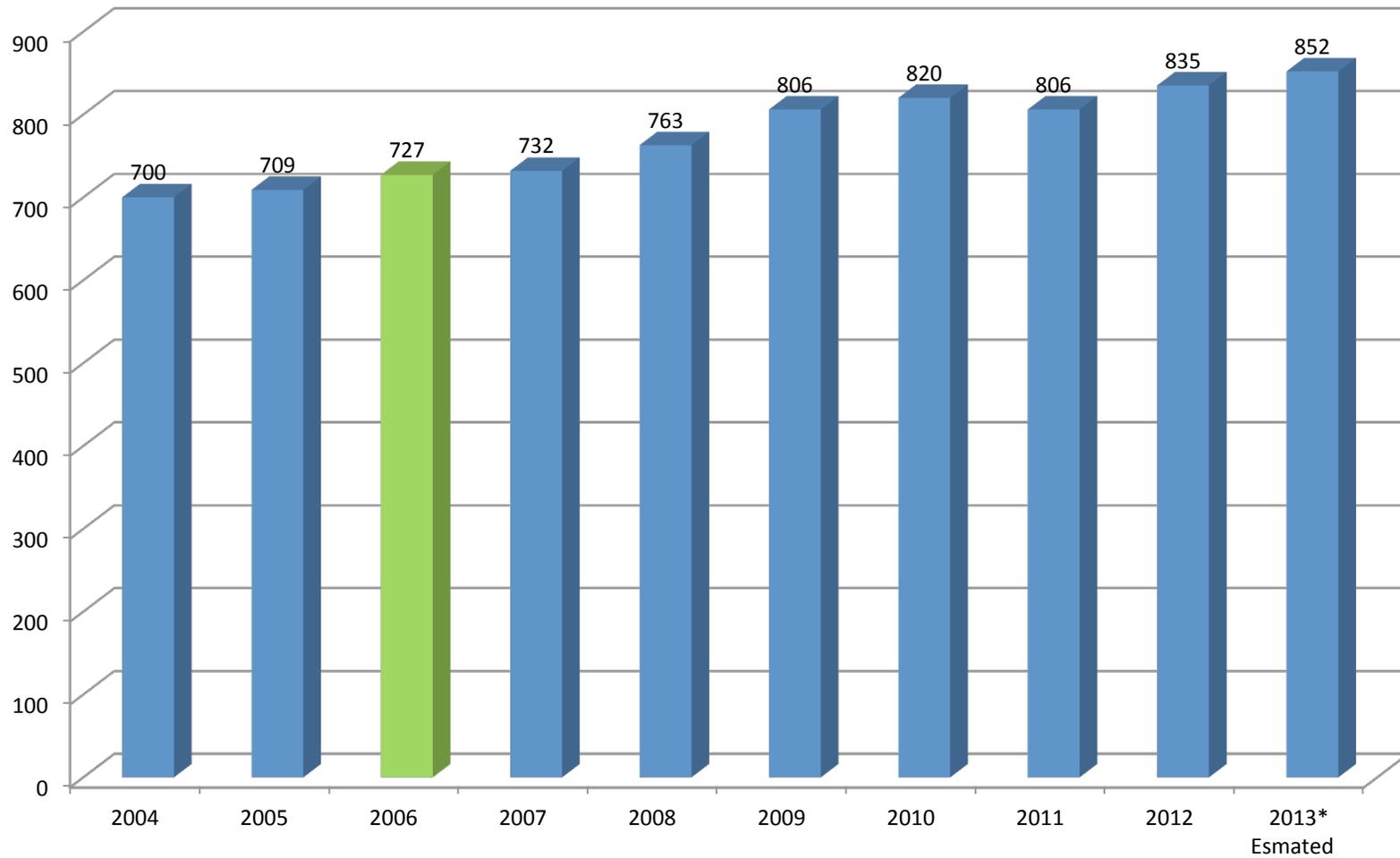
Academic Benefits of Dual Immersion for All Students



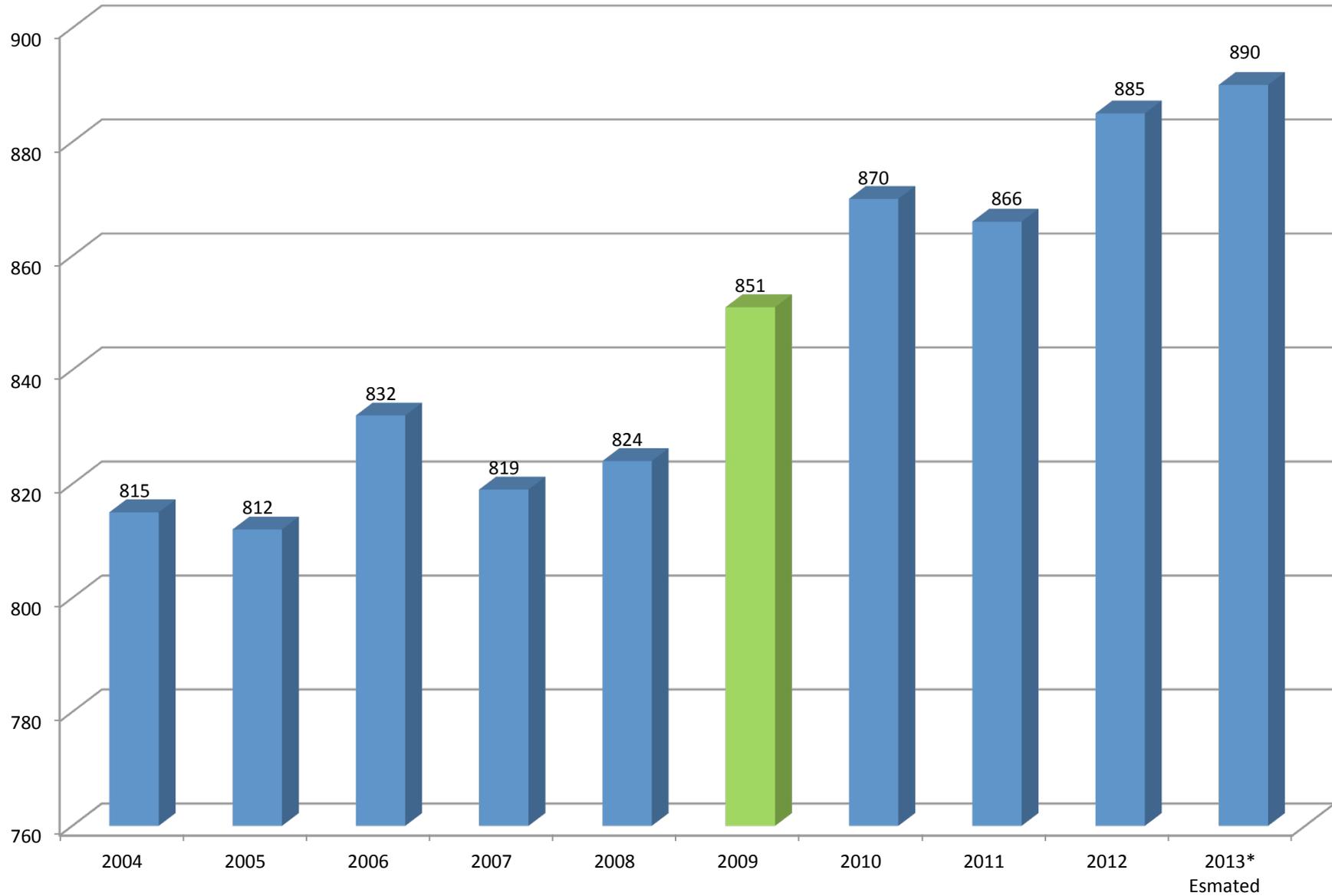
James Cummins, 1991

Academic Growth of Dual Elementary Schools

Edison – Academic Performance Index (API)

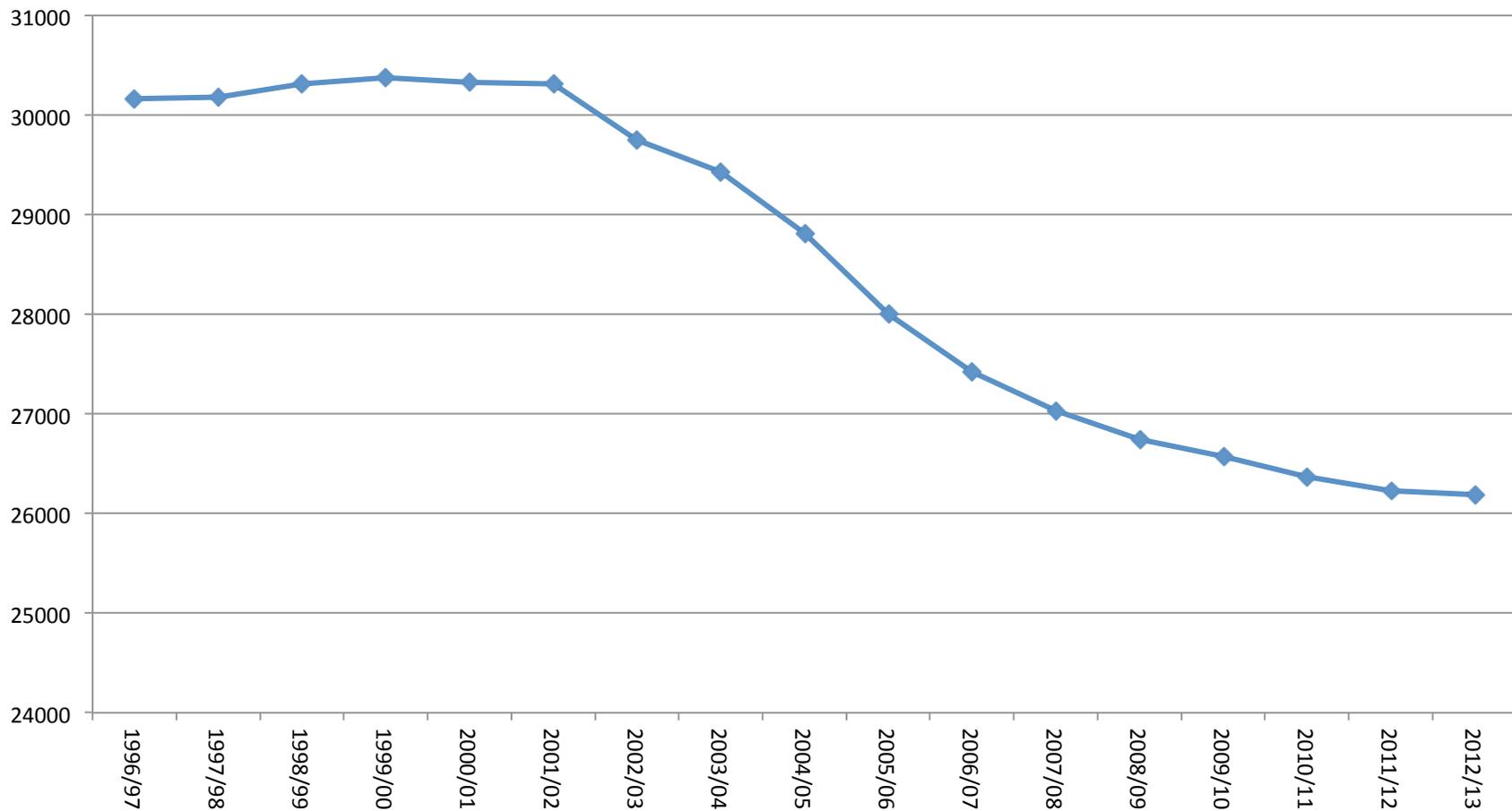


Keppel – Academic Performance Index (API)

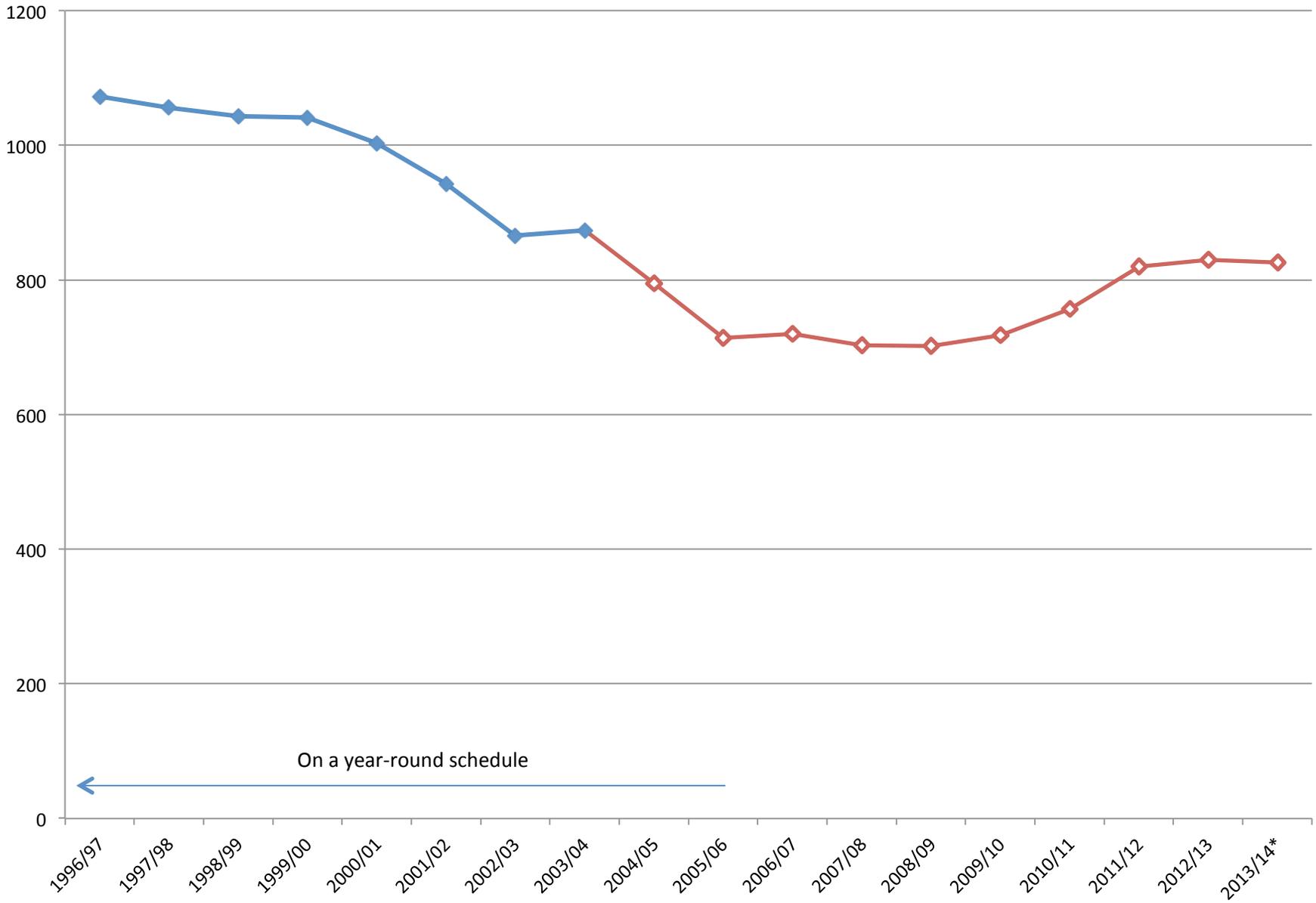


Declining Enrollment

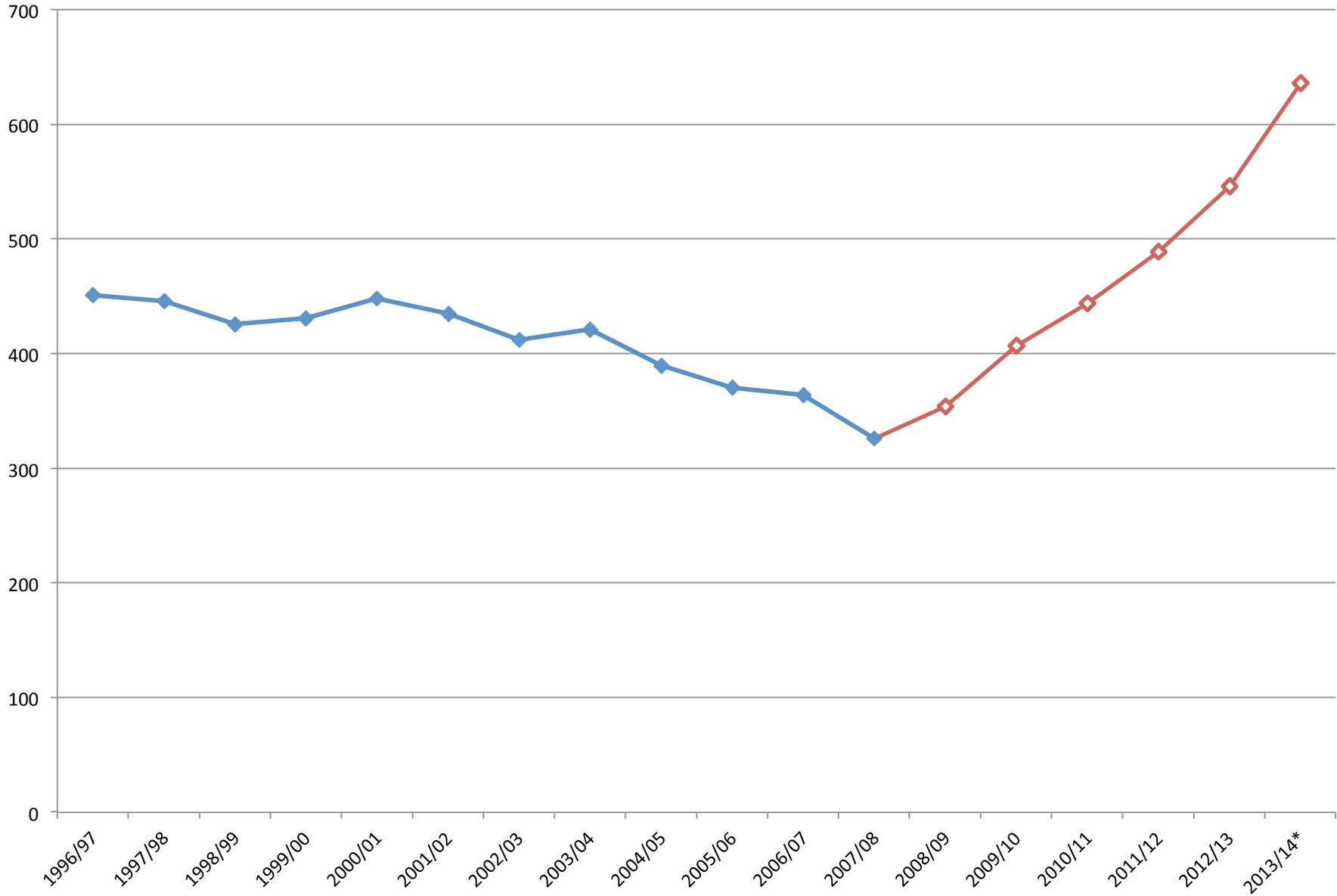
**Glendale Unified School District
Total Student Enrollment, 1996/97 to 2012/13**



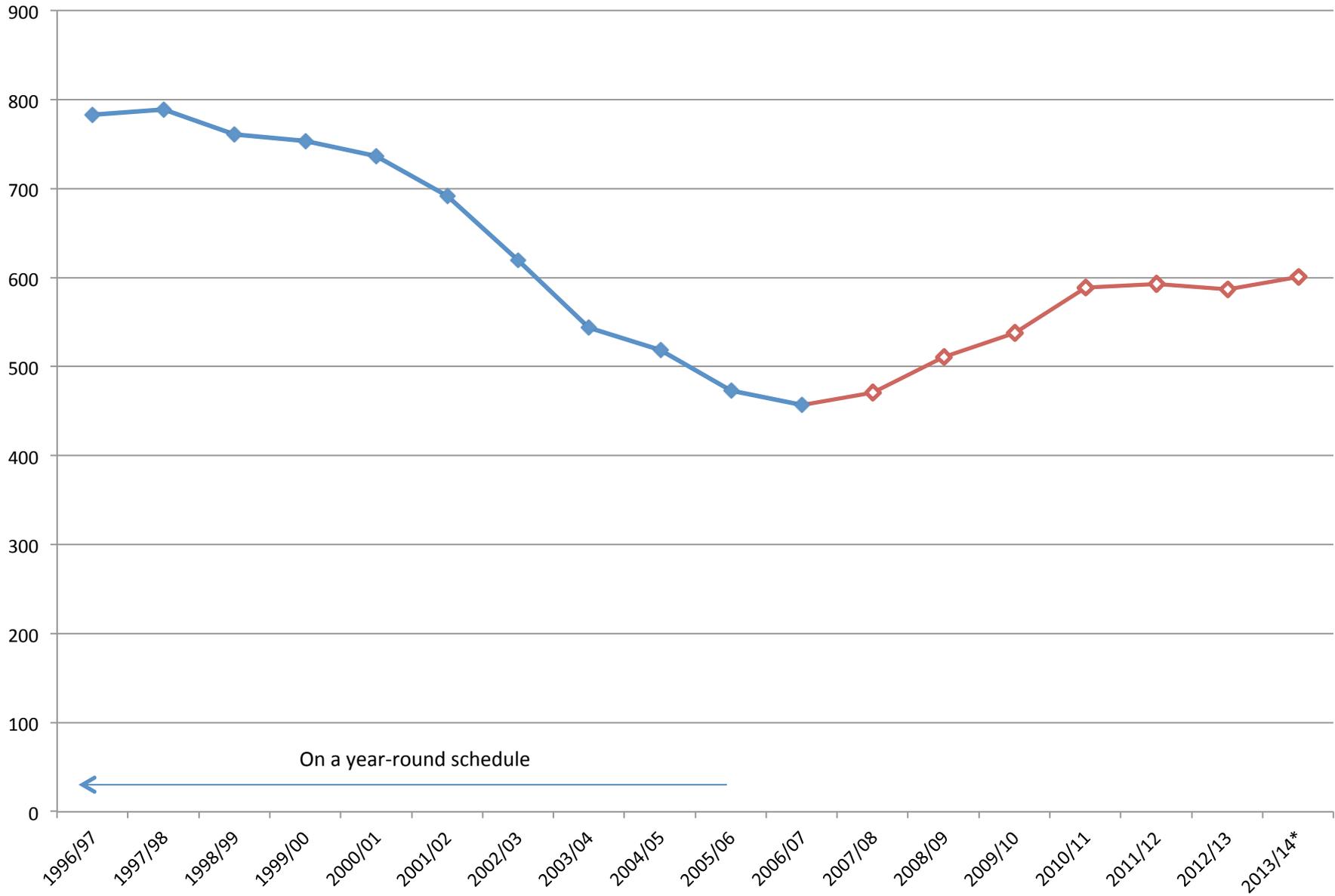
Edison Elementary School



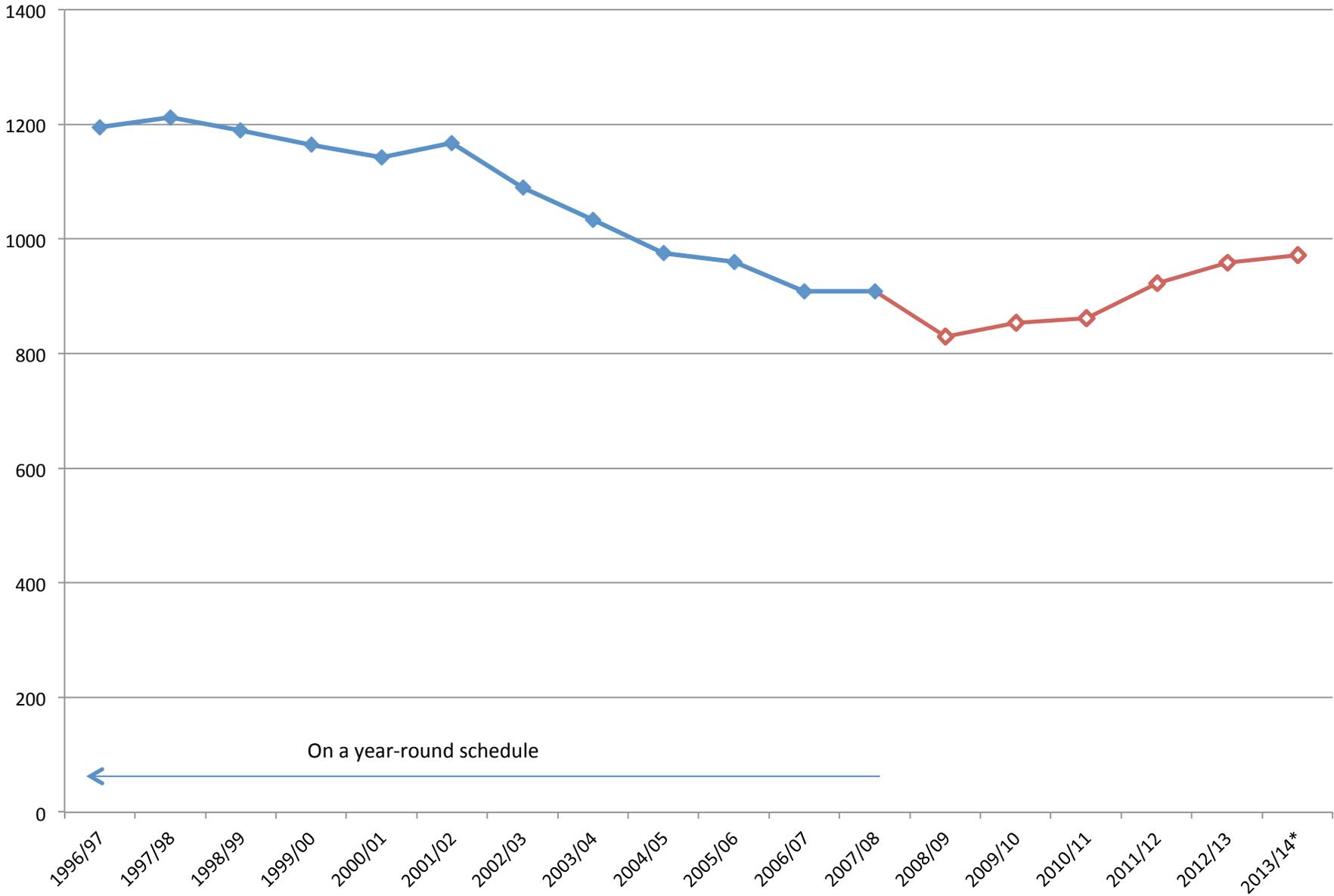
Franklin Elementary School



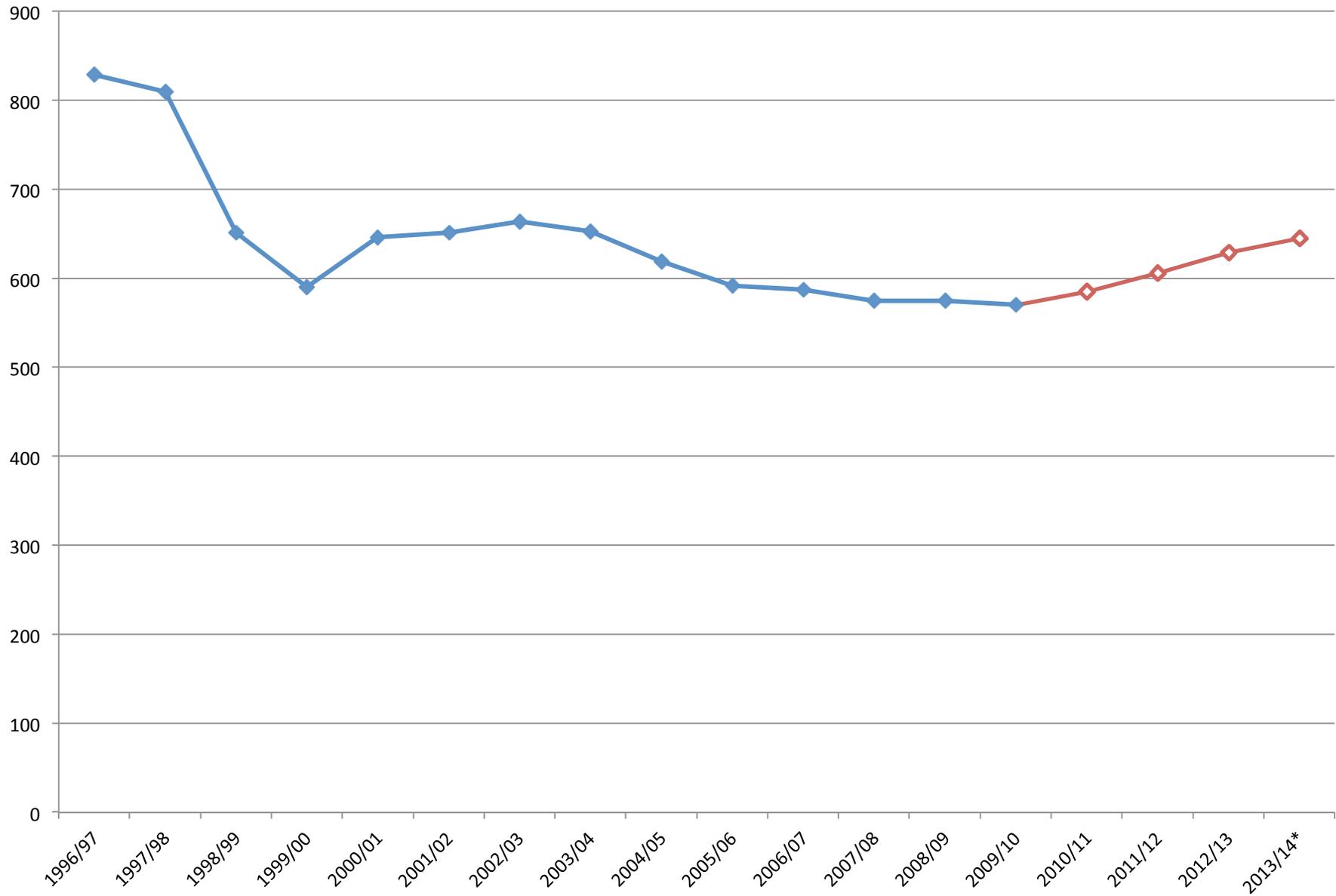
Jefferson Elementary School



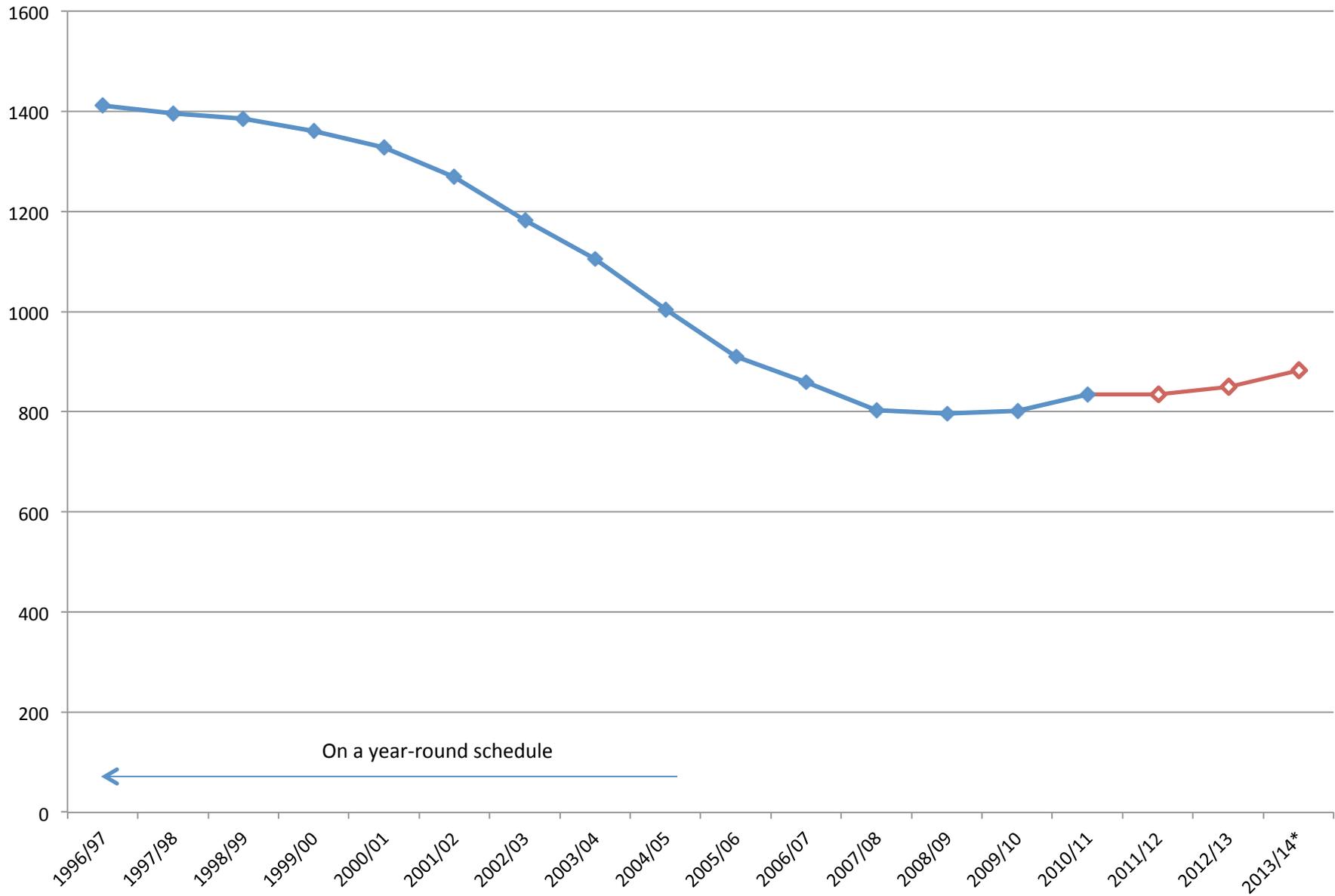
Keppel Elementary School



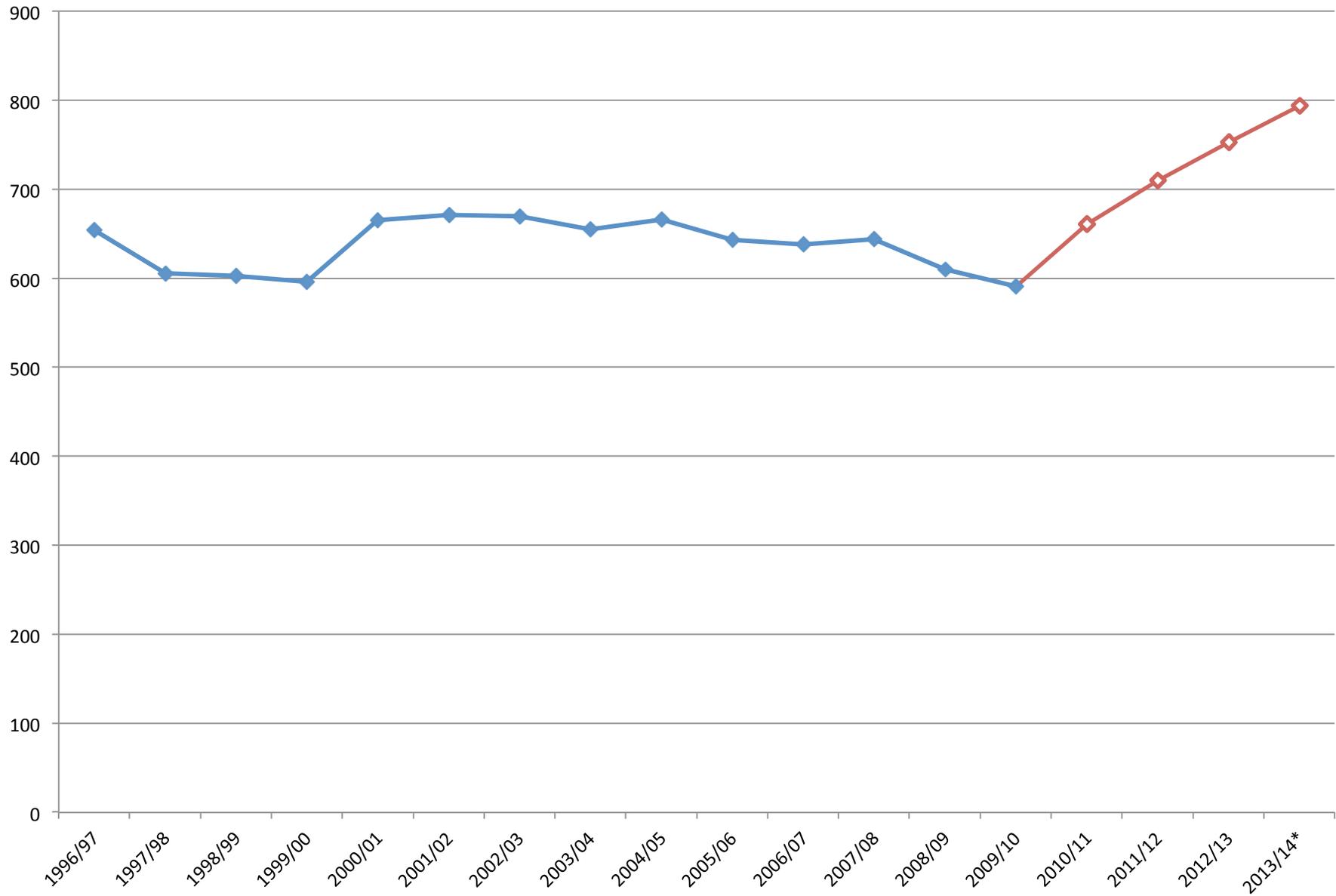
Monte Vista Elementary School



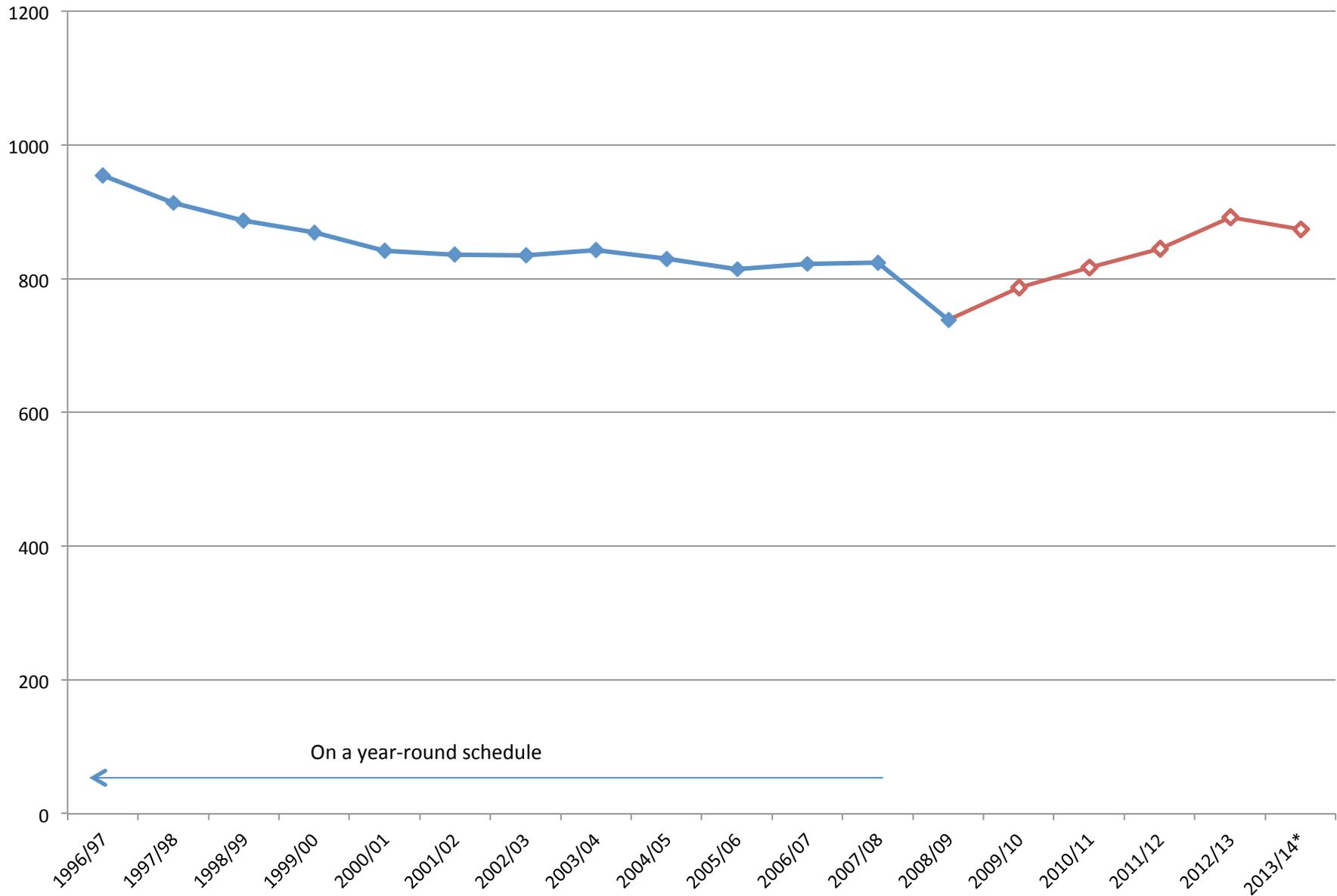
Muir Elementary School



Verdugo Woodlands Elementary School



R. D. White Elementary



Number of Inter-district Permits

2012/2013

	Armenian		French	German	Italian	Japanese	Korean		Spanish			Totals
	Jefferson	RD White	Franklin	Franklin	Franklin	Verdugo Woodlands	Keppel	Monte Vista	Edison	Franklin	Muir	
Total # of Inter-district Permits	10	11	7	61	47	66	40	5	80	89	33	449
Total # of Dual Elementary Students	307	165	24	99	92	153	238	159	353	240	89	1,919
% of Dual Population on Inter-district Permits	3.26%	6.67%	29.17%	61.62%	51.09%	43.14%	16.81%	3.14%	22.66%	37.08%	37.08%	23%

Superintendent's Advisory Committee for Dual Immersion Programs

- Met during the 2012/13 school year
- Parent representatives from each school and each program were invited to participate
- FLAG Parent Survey distributed to all dual parents and the parents of incoming Kindergartners (871 responses)
- Advisory Committee members used the parent survey results and their knowledge regarding the dual immersion program to write recommendations for each program

K-12 Dual Immersion Master Plan

Goal #1

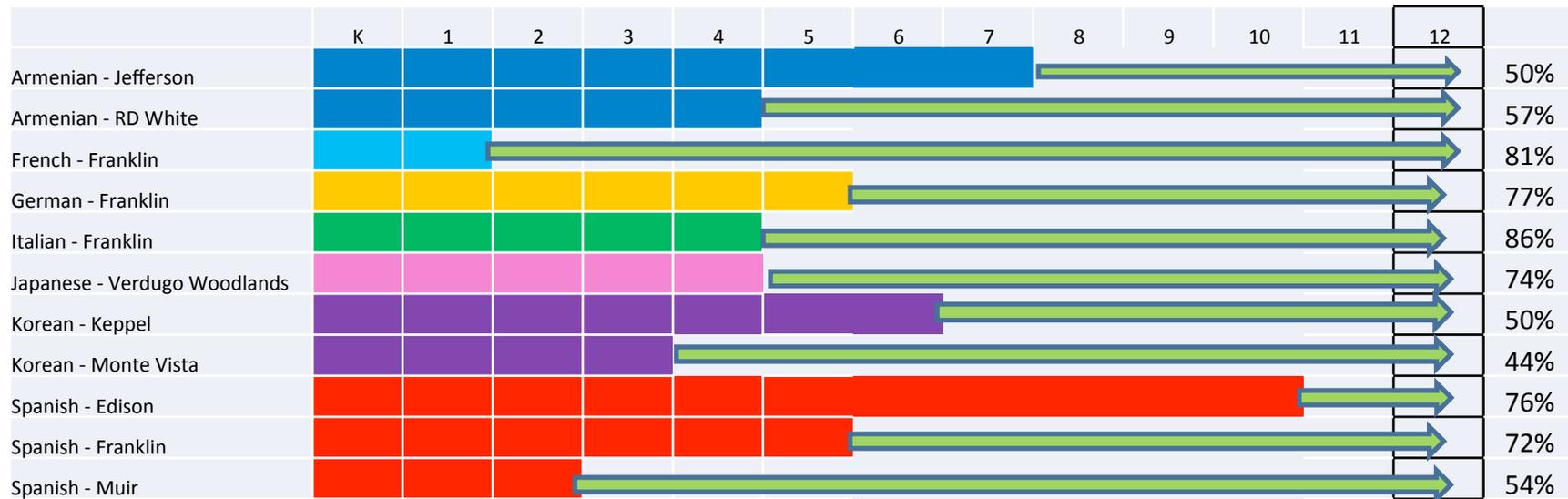
To identify the matriculation patterns for all FLAG programs and determine if each program will be K 6, K 8, or K 12

Current Dual Enrollment by Grade Distribuon

	K	1	2	3	4	5	6	7	8	9	10	11	12
Armenian - Jefferson	Blue	Blue	Blue	Blue	Blue	Blue	Blue	Toll					
Armenian - RD White	Blue	Blue	Blue	Blue	Blue								
French - Franklin	Cyan	Cyan											
German - Franklin	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow							
Italian - Franklin	Green	Green	Green	Green	Green								
Japanese - Verdugo Woodlands	Pink	Pink	Pink	Pink	Pink								
Korean - Keppel	Purple	Purple	Purple	Purple	Purple	Purple	Toll						
Korean - Monte Vista	Purple	Purple	Purple	Purple									
Spanish - Edison	Red	Red	Red	Red	Red	Red	Red	Toll	Toll	Hoover	Hoover		
Spanish - Franklin	Red	Red	Red	Red	Red	Red							
Spanish - Muir	Red	Red	Red										

Boxes outlined in black indicate years when students matriculate into middle school and high school and decisions need to be made regarding which secondary schools will house each program.

What Parents Are Asking For:



For the most part parents are asking for the programs to extend K-12.

NOTE: There is a notable trend of declining enrollment as students matriculate into middle and high school. For example, of the 21 Keppel FLAG students matriculating into 6th grade, only 47% are continuing with the dual language program.

Matriculation Patterns Parents Are Asking For:

Program	Middle School with Highest Percentage as 1 st Choice	%
Armenian - Jefferson	Toll	64%
Armenian – RD White	Wilson	70%
French – Franklin	Tie: Rosemont, Toll, Wilson	29% each
German – Franklin	Toll	44%
Italian – Franklin	Tie: Rosemont, Toll	40%/37%
Japanese – Verdugo Woodlands	Tie: Rosemont, Wilson	47%/43%
Korean – Keppel	Toll	57%
Korean – Monte Vista	Rosemont	99%
Spanish – Edison	Toll	46%
Spanish – Franklin	Toll	57%
Spanish - Muir	Roosevelt	76%

Considerations for Creating K-12 Programs

- Credential requirements change as the programs move into middle and high school.
- Teachers at a K-5 or K-6 elementary school must have a California multiple subject teaching credential.
- 6th grade teachers at a middle school can have a multiple subject teaching credential ONLY if they teach the same group of students for English Language Arts/Social Studies or Mathematics/Science. The class roster must be identical for both subjects.
- Teachers at a 6-8, 7-8, or 9-12 who do not teach in a self-contained classroom must have a single-subject teaching credential in each subject they teach.
- The language arts class in the target FLAG language is considered to be an elective in middle and high school.

What's Important to Parents

It is important to parents that the FLAG teachers are native or native-like speakers with academic proficiency in the target language.

The % of parents who believe that the quality of the teacher has a strong or severe impact on their decision to keep their child in the FLAG program are:

- Armenian – Jefferson = 83%
- Armenian – RD White = 73%
- French – Franklin = 96%
- German – Franklin = 88%
- Italian – Franklin = 100%
- Japanese – Verdugo Woodlands = 87%
- Korean – Keppel = 86%
- Korean – Monte Vista = 92%
- Spanish – Edison = 88%
- Spanish – Franklin = 87%
- Spanish – Muir = 82%

Searching for the Teaching Equivalent of nicorns...



K-12 Dual Immersion Master Plan

Goal #2

To identify where elementary
FLAG programs will be housed and
what is needed to enrich the
elementary

Considerations for Elementary Placement – Edison (Spanish)

- Currently matriculating to Toll and Hoover
- Toll dual students take an elective (Spanish language arts) and th th grade history taught in Spanish
- Toll teachers are from Spain and have two more years available on their visas
- Hoover dual students take Spanish for Native Speakers 5/6 in Gr. 9, AP Spanish in Gr. 10, and AP Spanish Literature in Gr. 11
- Parents want a 7-period option for students to take an extra elective (83%)
- Parents want 2 or more classes taught in Spanish (79%)
- Parents want homework support in Spanish (67%)

Franklin (French)

- Need to decide where students will matriculate to middle and high school
- Parents want a 7-period option for students to take an extra elective (89%)
- Parents want 2 or more classes taught in French (95%)
- Parents want homework support in French (59%)
- 51% want their child to study a 3rd language with Spanish being the most popular

Franklin (German)

- Need to decide where students will matriculate to middle and high school
- Parents want a 7-period option for students to take an extra elective (84%)
- Parents want 2 or more classes taught in German(91%)
- Parents want homework support in German(45%)
- 51% of parents want their child to study a 3rd language with Spanish being the most popular
- Desire to improve quality of instruction in German, English, and STEM (science, technology, engineering, and mathemac)

Franklin (Italian)

- Need to decide where students will matriculate to middle and high school
- Parents want a 7-period option for students to take an extra elective (88%)
- Parents want 2 or more classes taught in Italian (94%)
- Parents want homework support in Italian (54%)
- 64% of parents want their child to learn a 3rd language with Spanish and French being the most popular
- Split grade level classes are a concern
- Desire to improve quality of instruction in STEM (science, technology, engineering, and mathematics)

Franklin (Spanish)

- Need to decide where students will matriculate to middle and high school
- Parents want a 7-period option for students to take an extra elective (83%)
- Parents want 2 or more classes taught in Spanish (91%)
- Parents want homework support in Spanish (59%)

Jefferson (Armenian)

- Armenian Heritage Program: currently matriculates to Toll Middle School with plans to move into Hoover
- Armenian Dual Immersion Program: need to decide where students will matriculate to middle and high school
- Parents want a 7-period option for students to take an extra elective (65%)
- Parents want 2 or more classes taught in Armenian (83%)
- 45% of parents want their child to study a 3rd language with Spanish being the most popular

R.D. White (Armenian)

- Need to decide where students will matriculate to middle and high school
- Parents want a 7-period option for students to take an extra elective (76%)
- Parents want 2 or more classes taught in Armenian (83%)
- 67% of parents want their child to study a 3rd language with Spanish being the most popular

Keppel (Korean)

- Need to decide if students will continue to matriculate to Toll Middle School for Gr. 7-8 and determine where they will matriculate to for high school
- Parents want a 7-period option for students to take an extra elective (73%)
- Parents want 2 or more classes taught in Korean(68%)
- Parents want homework support in Korean(56%)

Muir

(Spanish)

- Need to decide where students will matriculate to middle and high school
- Parents want a 7-period option for students to take an extra elective (86%)
- Parents want 2 or more classes taught in Spanish (83%)
- Parents want homework support in Spanish (59%)

Monte Vista (Korean)

- Currently Monte Vista does not have the classroom space necessary to house the Korean program, -6
- Need to decide where the K-6 Korean program will be housed and then decide where the students will matriculate to for middle and high school
- Parents want a 7-period option for students to take an extra elective (83%)
- Parents want 2 or more classes taught in Korean(68%)
- Parents want homework support in Korean(73%)

Options for the Korean FLAG Program

1. Keep Korean program at Monte Vista by decreasing to one Kindergarten class
2. Keep Korean program at Monte Vista by adding classrooms to the school site
3. Move the Korean program, Gr. 4-6 to another school
4. Move the Korean program, K-6 to another school
5. Move the Korean program to middle school Gr. 6-8
6. Move all 6th graders to middle school

Verdugo Woodlands (Japanese)

- Currently Verdugo Woodlands does not have the classroom space necessary to house the Korean program, -6
- Need to decide where the K-6 Japanese program will be housed and then decide where the students will matriculate to for middle and high school
- Parents want a 7-period option for students to take an extra elective (89%)
- Parents want 2 or more classes taught in Japanese (83%)
- Parents want homework support in Japanese (51%)

Options for the Japanese FLAG Program

1. Keep Japanese program at Verdugo Woodlands by decreasing to one Kindergarten class
2. Keep Japanese program at Verdugo Woodlands by adding classrooms to the school site
3. Move the Japanese program, Gr. 4-6
4. Move the Japanese program, -6
5. Move the Japanese program to middle school Gr. 6-8
6. Move all 6th graders to middle school

Other FLAG Considerations...

- Need for professional development for Dual teachers
 - Transition to Common Core State Standards
 - Academic language acquisition strategies (GLAD)
- Need for funds to purchase CCSS aligned materials
- Need to formally board adopt Dual curriculum and materials
- Need for supplemental funding for FLAG enrichment and leadership to ensure robust recruitments and consistency across school sites
- Need to develop capstone projects for Gr. 6, Gr. 8, and Gr. 12

Next Steps

- Discussion Item:
 - Augustth
 - Septemberrd
- Action Item:
 - Septemberth and October 1st if needed

Glendale Unified School District
ANNUAL SALARY SCHEDULE - TEACHERS
Teachers with Preliminary or Clear Credentials
Beginning Teacher Salary Incentive Program



APPENDIX B
2013 - 2014
Effective July 1, 2013

STEP	CLASS I	CLASS II	CLASS III	CLASS IV	CLASS V	CLASS VI
	Bachelor's Degree	Bachelor's Degree + 14 Semester Units (21 Quarter Units)	Bachelor's Degree + 28 Semester Units (42 Quarter Units)	Bachelor's Degree + 42 Semester Units (63 Quarter Units)	Bachelor's Degree + 56 Semester Units (84 Quarter Units) + MA or 62 Semester Units (93 Quarter Units)	Bachelor's Degree + 70 Semester Units (105 Quarter Units) + MA
1	\$ 46,868	\$ 46,869	\$ 46,870	\$ 46,871	\$ 46,873	\$ 49,058
2	\$ 46,869	\$ 46,870	\$ 46,871	\$ 46,873	\$ 47,391	\$ 51,745
3	\$ 46,870	\$ 46,871	\$ 46,873	\$ 47,218	\$ 49,833	\$ 54,432
4	\$ 46,871	\$ 46,873	\$ 47,175	\$ 49,333	\$ 52,308	\$ 57,130
5	\$ 46,873	\$ 46,874	\$ 49,154	\$ 51,444	\$ 54,786	\$ 59,787
6	\$ 46,874	\$ 48,727	\$ 51,163	\$ 53,523	\$ 57,261	\$ 62,483
7	\$ 48,394	\$ 50,622	\$ 53,206	\$ 55,642	\$ 59,735	\$ 65,176
8	\$ 50,188	\$ 52,487	\$ 55,210	\$ 57,728	\$ 62,176	\$ 67,863
9	\$ 52,022	\$ 54,390	\$ 57,220	\$ 59,845	\$ 64,343	\$ 70,490
10	\$ 53,815	\$ 56,290	\$ 59,233	\$ 61,951	\$ 67,125	\$ 73,187
11	\$ 55,611	\$ 58,159	\$ 61,280	\$ 64,036	\$ 69,597	\$ 75,876
12			\$ 63,284	\$ 66,154	\$ 72,077	\$ 78,567
13			\$ 65,183	\$ 68,139	\$ 72,077	\$ 78,567
14			\$ 67,137	\$ 70,183	\$ 72,077	\$ 78,567
15					\$ 72,077	\$ 78,567
16					\$ 75,682	\$ 82,494
17					\$ 75,682	\$ 82,494
18					\$ 79,468	\$ 86,620
19					\$ 79,468	\$ 86,620
20					\$ 79,468	\$ 86,620
21					\$ 79,468	\$ 86,620
22					\$ 79,468	\$ 86,620

The above annual rates apply to individuals employed for 186 days of service for the 2013-2014 school year.

Effective July 1, 1996, \$100.00 per month will be paid for an earned Doctorate from a college or university accredited by a regional or national accrediting association recognized by the National Commission on Accreditation.

Glendale Unified School District
ANNUAL SALARY SCHEDULE - TEACHERS
Teachers with Preliminary or Clear Credentials
Beginning Teacher Salary Incentive Program

APPENDIX B
2013 - 2014
Effective July 1, 2013

STEP	CLASS I	CLASS II	CLASS III	CLASS IV	CLASS V	CLASS VI
	Bachelor's Degree	Bachelor's Degree + 14 Semester Units (21 Quarter Units)	Bachelor's Degree + 28 Semester Units (42 Quarter Units)	Bachelor's Degree + 42 Semester Units (63 Quarter Units)	Bachelor's Degree + 56 Semester Units (84 Quarter Units) + MA or 62 Semester Units (93 Quarter Units)	Bachelor's Degree + 70 Semester Units (105 Quarter Units) + MA
23					\$ 79,468	\$ 86,620
24					\$ 79,468	\$ 86,620
25					\$ 79,468	\$ 86,620
26					\$ 79,468	\$ 86,620
27					\$ 79,468	\$ 86,620
28					\$ 83,649	\$ 90,802

The above annual rates apply to individuals employed for 186 days of service for the 2013-2014 school year.

Effective July 1, 1996, \$100.00 per month will be paid for an earned Doctorate from a college or university accredited by a regional or national accrediting association recognized by the National Commission on Accreditation.

BURBANK UNIFIED SCHOOL DISTRICT

EXHIBIT A-1

SALARY SCHEDULE FOR FULL-CREDENTIAL CERTIFICATED BARGAINING UNIT MEMBERS*

Effective July 1, 2014

Salary Rating	Class I Bachelor's Degree	Class II Bachelor's Degree +15	Class III Bachelor's Degree +30	Class IV Bachelor's Degree +45	Class V Bachelor's Degree +60	Class VI Bachelor's Degree +75
1	49,171	49,174	50,711	51,209	53,053	55,113
2	49,174	49,175	50,712	52,404	54,975	57,033
3	49,175	49,176	51,711	54,259	56,846	58,908
4	49,176	50,012	53,592	56,162	58,768	60,831
5	49,177	51,792	55,436	58,018	60,645	62,706
6	49,178	53,638	57,315	59,923	62,564	64,626
7	49,179	55,402	59,157	61,776	64,442	66,501
8	49,180	57,231	61,039	63,681	66,361	68,422
9	50,548	59,010	62,877	65,536	68,237	70,974
10		60,839	64,763	67,440	72,178	72,916
11		62,623	66,601	69,295	74,109	74,804
12			68,484	71,199	76,085	76,746
13			70,323	73,059	78,014	78,640
14			72,209	74,958	79,992	80,578
15				76,816	81,924	83,088
18**					83,895	85,783
21**					85,828	88,433
24**						92,205

Notes: **Employees hired on or after July 1, 2005 may not advance past the bold lines in Columns I, II and III.**
Employees hired before July 1, 2005 shall be grandfathered.

The earned Master's Degree or earned Doctorate Degree is recognized at any point on the schedule with \$1,266 added to the base salary. Only one earned Master's Degree and only one earned Doctorate Degree will be recognized for this additional remuneration. The maximum amount for any employee for the Master's Degree and Doctorate is \$2,533.

A Bilingual Certificate of Competence, Bilingual-Cross Cultural Credential, other state approved bilingual certificate or credential, or evidence of mastery of the American Sign Language Communication Proficiency Interview is recognized at any point on the schedule with additional remuneration added to the base salary. This additional remuneration shall be \$1,266 for an employee employed in an assignment that requires the use of primary language for supporting students, conferencing with parents, and preparing progress reports.

A Learning Handicapped, Severely Handicapped, Deaf and Hard of Hearing, Resource Specialist, Speech/Language Therapist, Adaptive Physical Education, Mild-to-Moderate, Moderate-to-Severe, or other state approved special education certificate or credential is recognized at any point on the schedule with \$1,266 added to the base salary provided such employee is employed in a special education assignment.

Speech/Language Therapists employed by the District on or after July 1, 2010 shall receive a total one-time hiring incentive bonus of \$10,820 of which \$3,246 shall be paid after the completion of the first year of full time employment, an additional \$3,246 shall be paid after the completion of the second year of full time employment and the remaining payment of \$4,328 shall be paid after the completion of the third year of full time employment.

* Includes Teachers, Nurses, Librarians and Counselors who are fully credentialed.
 (For implementation, see Rules and Regulations.)

** Anniversary Step

**PASADENA UNIFIED SCHOOL DISTRICT
 CERTIFICATED SALARY SCHEDULE (C-1#)
 10 Months paid over 11 Months
 Effective January 1, 2014 - (3% Raise)**

- 1 Provisions of the salary schedule apply to all certificated K-12 teachers in contract assignments and Early Childhood Certificated Teachers.
- 2 New employees are granted schedule placement credit for years of experience. Some types of non-school work experience directly related to the assignment, and/or active military service may also be considered for salary placement. Column (Class) placement is based on the number of semester units or credits beyond the BA conferral date entered on official transcripts. Initial salary placement for teachers with 0 or 1 year of experience is 5(1)#. Maximum initial step placement is at 11(7)# for teachers with seven or more years of previous service.

PREV SVC YRS	STEP*	CLASS A BA	CLASS B BA + 18	CLASS C BA + 36	CLASS D BA + 54	CLASS E BA + 60 Inc. MA or Earned Dr**	CLASS F BA + 75 Inc. MA or Earned Dr**	DR'S DEGREE ***
0,1								
2	(5)1	4,238	4,238	4,239	4,241	4,266	4,435	222
3	(6)2	4,238	4,239	4,241	4,266	4,435	4,604	230
4	(7)3	4,239	4,241	4,266	4,435	4,604	4,772	239
5	(8)4	4,241	4,311	4,435	4,604	4,772	5,074	254
6	(9)5	4,322	4,465	4,604	4,772	5,074	5,371	269
7	(10)6	4,464	4,620	4,772	5,074	5,371	5,677	284
8	(11)7	4,602	4,775	5,074	5,371	5,677	5,976	299

9	8	4,871	4,847	5,151	5,454	5,763	6,292	315
10	9	4,717	4,896	5,202	5,506	5,820	6,627	331
11	10	4,717	4,896	5,202	5,506	5,820	6,958	348
12	11	4,717	4,896	5,202	5,506	5,820	7,062	353
13	12	4,717	4,896	5,202	5,506	5,820	7,062	353
14	13	4,717	4,896	5,202	5,506	5,820	7,062	353
15	14	4,717	4,896	5,202	5,506	5,820	7,062	353
16	15	4,717	4,896	5,202	5,506	5,820	7,062	353
16th Year Service Increment (Monthly Additive)*****		236.00	245.00	260.00	275.00	291.00	353.00	
21st Year Service Increment (Monthly Additive)*****		236.00	245.00	260.00	275.00	291.00	353.00	

- * An employee must serve three-fourths of a year or more to qualify for the next step.
 - ** Semester hours.
 - *** The Dr.'s Degree includes a 5% increment (Annual Additive), effective 9/1/95.
 - **** Double line indicates maximum limits for initial employment.
 - ***** A service increment of 5% calculated on the maximum regular step (not longevity service increment steps) of each column payable after 15 years of full time service in the PASADENA UNIFIED SCHOOL DISTRICT is added to the basic salary, subject to favorable work performance evaluation. The 15-year increment is a flat amount without regard to number of months served.
 - ***** A service increment of 5% calculated on the maximum regular step (not longevity service increment steps) of each column payable after 20 years of full time service in the PASADENA UNIFIED SCHOOL DISTRICT is added to the basic salary, subject to favorable work performance evaluation. The 20-year increment is a flat amount without regard to number of months served.
 - # Salary schedule C-1 is used for teachers who hold the California Clear or Preliminary Credential or who hold full certification in another state.
- A stipend of \$2,500 will be paid to teachers, holding National Board Certification® issued by the National Board for Professional Teaching Standards; nurses holding national board certification issued by the Pediatric Nurse Certification Board, American Nurses Credentialing Center, American Academy of Nurse Practitioners and the National Board Certification of School Nurses; and language, speech and hearing specialist holding a Certificate of Clinical Competence issued by the American Speech-Language Hearing Association. The stipends shall be paid at the rate of \$250 per month.
- Education Code Section 45041 provides that certificated employees have their annual salary adjusted for absences based on the number of days required to be served in a contract year. Yearly salary to be paid will reflect these adjustments.

State Of California
Commission On Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95811-4213
Email: credentials@ctc.ca.gov
Website: www.ctc.ca.gov

THE SOJOURN CERTIFICATED EMPLOYEE CREDENTIAL

The Sojourn Certificated Employee Credential authorizes the holder to provide bilingual instruction, foreign language instruction, or cultural enrichment in the elementary and/or secondary grades of the employing California public school district in the subjects the applicant is academically competent to teach.

Requirements for the Credential

Individuals must satisfy **all** of the following requirements:

1. Completion of 90 semester hours of college or university course work taken at an institution in a country other than the United States. Individuals must obtain a complete evaluation of foreign transcripts, degrees, and other relevant documents prior to applying to the Commission for a California credential, permit, or certificate. See Commission leaflet [CL-635](#), entitled *Foreign Transcript Evaluation*, for additional information.
2. Satisfy the [basic skills requirement](#). See Commission leaflet [CL-667](#), entitled *Basic Skills Requirement*, for additional information. A one-year nonrenewable (OYNR) credential is available to individuals who meet all of the requirements listed in this leaflet but have not yet met the basic skills requirement.
3. Certification by the governing board of the employing California school district that the individual is a bilingual-biliterate teacher, fluent both in English (this may be satisfied by passage of the employer-administered basic skills examination) and the target language by **one** of the following:
 - a. A three-year or higher degree from a foreign institution in which all instruction is delivered in the target language
 - b. Passage in the target language of the listening and speaking sections of Test 6 of the [CTEL/BCLAD Examinations](#)
 - c. Passage in the target language of the exit assessment covering oral language proficiency, both listening and speaking, administered by a California college or university as a part of its Commission-approved BCLAD emphasis program
4. Verification that the individual was employed as a teacher during the calendar year immediately preceding the date of application
5. Certification by the governing board of the employing California school district that the individual will be employed by the school district in a teaching assignment authorized by the Sojourn Certificated Employee Credential, and that the individual has been informed in writing of his or her employment status and renewal requirements
6. A written statement, signed by the applicant, verifying knowledge of the general requirements for a regular credential and agreeing to diligently pursue completion of those requirements
7. Completed credential application ([form 41-4](#))

8. Completed LiveScan receipt ([form 41-LS](#)). Out-of-state residents must submit two completed fingerprint cards (FD-258) in lieu of a LiveScan receipt and fingerprint [processing fees](#). Fingerprint cards may be ordered from the Commission by email at credentials@ctc.ca.gov.
9. Application processing fees (see Fee Information [leaflet CL-659](#))

Renewal

The credential will be issued initially for two years. It may be renewed one year at a time, upon completion of renewal requirements, for no more than a total of **five** one-year renewals.

For the **first renewal**, individuals must submit **all** of the following:

1. Completed application ([form 41-4](#)) and [processing fee](#)
2. A statement from the employing California school district verifying the continued need for the services of the Sojourn Certificated Employee
3. Completion of a minimum of 12 semester units (completed during the term of the credential) of college or university course work applicable toward meeting the requirements for the Preliminary Multiple Subject or Single Subject Teaching Credential

For each **subsequent** one-year renewal, individuals must submit **all** of the following:

1. Completed application ([form 41-4](#)) and [processing fee](#)
2. A statement from the employing California school district verifying the continued need for the services of the Sojourn Certificated Employee
3. Completion of a minimum of 6 additional semester units (completed during the term of the credential) of college or university course work applicable toward meeting the requirements for the Preliminary Multiple or Single Subject Teaching Credential

Applying for the Multiple or Single Subject Teaching Credential

Four years of successful classroom teaching on the basis of a Sojourn Certificated Employee Credential, as demonstrated by continual employment in the public schools, shall be accepted as equivalent to the professional preparation program requirement needed to obtain the Preliminary or Clear Multiple or Single Subject Teaching Credential. Refer to the leaflets below for additional information.

Multiple Subject Teaching Credential: <http://www.ctc.ca.gov/credentials/leaflets/cl871.pdf>

Single Subject Teaching Credential: <http://www.ctc.ca.gov/credentials/leaflets/cl870.pdf>

Reference: California Education Code, Sections 44261, 44856 and Title 5, California Code of Regulations, Sections 80055.2, 80413.1

**INTERNATIONAL STUDIES LANGUAGE ACADEMY
GOVERNING BOARD RESOLUTION
TO SUBMIT APPEAL OF DENIED CHARTER PETITION
TO LOS ANGELES COUNTY OFFICE OF EDUCATION**

WHEREAS, International Studies Language Academy is a nonprofit public benefit corporation existing under the laws of the State of California;

WHEREAS, International Studies Language Academy submitted at a Glendale Unified School District Board of Education public meeting on October 6, 2015 to establish a charter school;

WHEREAS, Glendale Unified School District Board unanimously denied the petition to establish a charter school at a Glendale Unified School District public meeting on December 15, 2015;

WHEREAS, the Governing Board of International Studies Language Academy resolved to submit an appeal of the denied charter petition at a public meeting held on December 17, 2015;

NOW, THEREFORE, BE IT RESOLVED THAT, International Studies Language Academy, pursuant to California Education Code §47605(j) and Title 5, California Code of Regulations §11967(a), hereby confirms its intention to submit an appeal of the denied charter petition to Los Angeles County Office of Education.

Approved by the Board of Directors on this seventeenth day of December, 2015.



Gillian Bonacci
Board Chair

12/22/15

Date



INTERNATIONAL STUDIES LANGUAGE ACADEMY

BOARD OF DIRECTORS – REGULAR MEETING

Date: Thursday, December 17, 2015 – 6:00 PM

Location: Glendale Central Library

222 East Harvard Street, Glendale, CA 91205

Second Floor, Room B

AGENDA

1. Welcome – Call to Order, Roll Call, Establish Quorum
2. Approval of the Agenda
3. Approval of Previous Meeting Minutes
4. Stakeholder Update
5. Public Comment
6. Resolution to Submit Charter Petition Appeal to Los Angeles County Office of Education
7. Adoption of Response to Glendale Unified School District's Findings of Fact
8. Resolution to Adhere to *Overview of the Process for Considering a Charter Petition Received on Appeal*; Los Angeles County Board Policies and Administrative Regulations Regarding Charter Schools; and the *Charter School Monitoring and Oversight Memorandum of Understanding (MOU)*
9. Adoption of Fiscal Policies and Procedures Handbook
10. Approval of Academica California Agreement
11. Approval of International Studies Charter School Affiliation Agreement
12. Ratification of Public Charter Schools Grant Program (PCSGP) Application
13. Ratification of Application to the El Dorado County Charter SELPA
14. Discussion of other SELPA options
15. Discussion of Principal, Teachers, and Staff
16. Real Estate Update
17. Announcements
18. Adjournment

Board Meeting – February 16, 2016

Staff Findings on the *International Studies Language Academy, Grades TK-8*: Appeal of a Petition to Establish a Charter Previously denied by the Glendale Unified School District Board of Education

- 2 -

**International Studies Language Academy
 Petition Received on Appeal**

Summary of Required Charter Elements Pursuant to <i>Education Code Section 47605(b)</i>			
Findings 1-5 are Grounds for Denial Pursuant to <i>EC 47605(b)</i>		Meets Requirements*	
Finding 1	Sound Educational Practice	No	
Finding 2	Ability to Successfully Implement Intended Program	No	
Finding 3	Required Number of Signatures	Yes	
Finding 4	Affirmation of Specified Conditions	Yes	
Finding 5: The charter petition contains a reasonably comprehensive description of all required elements.	1	Description of Educational Program	No
	2	Measureable Pupil Outcomes	No
	3	Method for Measuring Pupil Progress	No
	4	Governance Structure	No
	5	Employee Qualifications	No
	6	Health and Safety Procedures	Yes
	7	Racial and Ethnic Balance	No
	8	Admission Requirements	No
	9	Annual Independent Financial Audits	Yes
	10	Suspension and Expulsion Procedures	No
	11	Retirement Coverage	Yes
	12	Public School Attendance Alternatives	Yes
	13	Post-employment Rights of Employees	Yes
	14	Dispute Resolution Procedures	Yes
	15	Exclusive Public School Employer	Yes
	16	Closure Procedures	No
Finding 6: The charter petition meets the additional statutory requirements <i>EC 47605 (c), (e) – (h), (l) and (m)</i>	(c)	Standards, Assessments and Parent Consultation	Yes
	(e)	Employment is Voluntary	Not applicable
	(f)	Pupil Attendance is Voluntary	Not applicable
	(g)	Effect on Authorizer and Financial Projections Facilities, Administrative Services, Civil Liability and Financial Statements	No
	(h)	Targets Academically Low Achieving Pupils**	Does not qualify
	(l)	Teacher Credentialing	Yes
	(m)	Transmission of Audit Report	Yes

**Elements marked as meeting requirements may need further explanation, adjustment, or technical changes; however, they are reasonably comprehensive and/or substantively comply with regulatory guidance and the LACOE standard of review described in Board Policy and the Superintendent's Administrative Regulations.*

***Charters created to target academically low achieving pupils are given a priority for authorization*

Los Angeles County Office of Education
 Charter School Office
 Date: February 16, 2016

Staff Findings on the *International Studies Language Academy Charter Petition*, Grades TK-8
 Appeal of Petition to Establish a Charter Previously denied by the Glendale Unified School District Board
 of Education

Background Information

The petition for the *International Studies Language Academy (ISLA)* proposes the establishment of a Transitional Kindergarten (TK) through eighth grade charter school to be located within the boundaries of the Glendale Unified School District (GUSD). The first year enrollment projection is 438 students, with expansion to 1056 students by the fifth year of operation.

The petition states the charter school's mission is "to ensure high level academics in core subjects and language acquisition for all students regardless of their socio-economic status or English language proficiency to promote global competence, college preparedness, and career readiness."

The charter school's vision is "to be recognized as a top-ranked learning community that develops lifelong learners who are prepared to succeed in a global society."

The petition further states, "ISLA's development team was formed due to the growing success and popularity for elementary two-way dual language immersion programs in Glendale, the increases in the waiting lists for the immersion programs in Glendale, particularly in Spanish, and the scarcity of immersion middle school options for continuing French, Italian and German immersion students in Glendale. The team is a parent-led group working with educators, outside consultants, and in collaboration with the International Studies Charter School in Miami, Florida."

The educational management organization (EMO) providing services to ISLA is *Academica California, LLC*, part of the larger network of a for-profit company that services schools operating primarily in Florida, Utah, and Nevada. *Academica* currently services one charter school in California, *Los Angeles Academy of Arts and Enterprise*, which is authorized by the Los Angeles Unified School District (LAUSD). Additional information regarding these entities is located in Finding 2.

ISLA proposes to open in its first year with a 438-student program offering multiple languages (Spanish, Italian, French, and German), within a two-way dual immersion program in grades K-5; and a middle school (grades 6-8) program with a high-level immersion and entry-level language acquisition programs in the four (4) target languages.

Academic and demographic information for elementary and middle schools located within GUSD is presented in the chart below.

Academic Data for Elementary and Middle Schools Located within Glendale USD

Elementary Schools	2013 Growth API	2013 State Rank	2013 Similar Schools Rank	2015 Program Improvement (PI) Status**
Balboa Elementary	900	9	10	Not in PI
Cerritos Elementary	875	8	10	Not in PI
Columbus Elementary	875	8	10	Year 2
Dunsmore Elementary	909	9	6	Not Title I

Staff Findings on the International Studies Language Academy Charter Petition

Academic Data for Elementary and Middle Schools Located within Glendale USD

Elementary Schools	2013 Growth API	2013 State Rank	2013 Similar Schools Rank	2015 Program Improvement (PI) Status**
Thomas Edison Elementary	852	7	9	Not in PI
Benjamin Franklin Elementary	842	7	4	Not Title I
John C. Fremont Elementary	895	9	3	Not Title I
Glencaks Elementary	871	8	3	Not Title I
Thomas Jefferson Elementary	882	8	10	Year 1
Mark Keppel Elementary	890	9	7	Not in PI
La Crescenta Elementary	878	8	2	Not Title I
Abraham Lincoln Elementary	917	10	8	Not Title I
Horace Mann Elementary	863	8	10	Year 2
John Marshall Elementary	840	7	10	Year 3
Monte Vista Elementary	948	10	5	Not Title I
Mountain Avenue Elementary	944	10	6	Not Title I
John Muir Elementary	856	7	8	Not in PI
Valley View Elementary	937	10	6	Not Title I
Verdugo Woodlands Elementary	916	9	9	Not Title I
R. D. White Elementary	869	8	9	Year 2
Theodore Roosevelt Middle	820	6	10	Year 5
Eleanor J. Toll Middle	851	8	8	Year 4
Rosemont Middle	937	10	10	Not Title I
Woodrow Wilson Middle	876	9	10	Year 3
Source: CDE DataQuest 2013 Growth API (School Accountability Report) & LEA List of Schools. Retrieved 1-28-16				
**Source: CDE DataQuest 2015 Accountability Progress Reporting. Retrieved 2-4-16				

Demographic information for the general population residing in the district and students enrolled in GUSD is presented in the following chart.

Demographic Composition

Demographic Categories	General Population within Geographic Boundaries of District (City of Glendale)*	GUSD Enrollment**
Black/African American	1.2%	1.3%
American Indian/Alaska Native	0.1%	0.2%
Asian	16.2%	11.9%
Filipino	–	6.4%
Hispanic/Latino	17.4%	23.1%
Native Hawaiian/Pacific Islander	0.1%	0.1%
White	61.5%	55.0%
Two or More Races	3.3%	2.1%
*Source: 2010 Census retrieved 1-25-16 from factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml , 0.2% is "some other race alone"		
**Source: CDE DataQuest as of 3-13-15. Retrieved 1-25-16		

Staff Findings on the International Studies Language Academy Charter Petition

Reason for Denial by Glendale Unified School District Board of Education

The GUSD Board of Education (GUSD Board) denied the petition based on written findings of fact adopted at a public meeting on December 15, 2015. The findings complied with requirements for denial under the *Charter School Act*. The following is a summary of GUSD Board's written factual findings relative to *Education Code (EC)*:

1. EC 47605(b)(5): The petition fails to provide a reasonably comprehensive description of eight (8) of the sixteen (16) required elements:

Element 1: Description of the Educational Program

- Target Population, Enrollment Trends: "The issue calls into question petitioner's ability to recruit from within the population of students it desires to serve and to reach the high level of enrollment it projects over the course of its planned term."
- Curriculum and Instructional Materials: The petition references a variety of "educational strategies, but does not clearly explain how these philosophies interrelate or cohere as one unified educational program" and does not fully explain how curriculum will be developed.
- Transitional Kindergarten: Petition lacks a transitional kindergarten as part of proposed program.
- Staffing: Proposed program described in petition is understaffed for teachers.
- Plan for Serving English Learners: The petition does not include curriculum and materials intended for English learner (EL) students.
- Plan for Serving Students with Disabilities: "The petitioners are not prepared to make available the continuum of options as required by federal and state law."

Element 2: Measurable Pupil Outcomes & Element 3: Method by Which Progress Towards Outcomes is Measured

Outcomes described in the petition are vague and not measurable. Several of the outcomes are not consistent with the program plan and expectations outlined elsewhere in the petition. Some of the measurable outcomes listed in the petition are "*impractical based upon the educational program proposed.*"

Element 4: Governance Structure

- Lack of Leadership Information: No members of the board are identified in the petition.
- Inconsistent Governing Documents: The bylaws contain operational provisions that are inconsistent with Brown Act compliance. Location for board meetings within District boundaries is not stated in the petition, which "may act as an impediment to parent participation."
- Conflict Policies: The Conflict of Interest Code lists employee positions that do not correspond with staffing plans in the petition.

Element 5: Employee Qualifications

- Teacher Salaries: The petition proposes a salary that is 29% less than the District's and does not account for the stipend for dual immersion teachers.
- Teacher Recruitment: The petition does not appear to "recognize the difficulties in recruiting teachers with specialized credentials for the dual immersion program."
- Instructional Aides: The job description for Instructional Aides does not require fluency in any of the target languages of the dual immersion program.

Staff Findings on the International Studies Language Academy Charter Petition

- **Attendance Accounting:** The petition does not identify a position to track or monitor attendance, CALPADS data, and identify EL students.
- **Office Manager:** Duties for the position as described in the petition require “too many tasks and skills to assume the job can be adequately staffed by a single individual.”

Element 6: Health and Safety Procedures

The petition allows for volunteers to perform services that are not under the direction of a school employee. It gives no indication as to who will provide vision, hearing, and scoliosis screenings. Medication administration policies in the petition do not align with applicable *EC* sections.

Element 8: Admission Requirements

In the areas of exemptions and order of preferences, “enrollment process and preferences stated in the petition do not meet legal requirements.”

Element 10: Suspension and Expulsion Procedures

The petition references *EC* 48900 et seq., but does not align with Assembly Bill No. 420 regarding willful defiance policies. It does not provide an opportunity to appeal a suspension or expulsion.

2. ***EC* 47605(b)(2):** The petitioners are demonstrably unlikely to successfully implement the program:

Education Program Staffing: Staff team has concerns regarding the implementation of the dual immersion program in the four target languages across grade levels given the number of teachers budgeted.

Administrative Services Plan: Staff team questions the proposed collaboration between ISLA and the International Studies Charter School in Miami, Florida, and its principal, Victoriano Rodriguez. Staff team believes that Academica does not have “knowledge or expertise in California to support a start-up charter school.”

Budget/Financial Plan: Staff team’s analysis of the budget shows overstatement of revenues and underestimation for expenses (including teacher salaries, textbooks/equipment, special education, professional development, and custodial costs), thereby causing “a significant financial deficit in every year.”

Charter School Location/Facility: The petition fails to offer a definitive facilities plan for the location of ISLA, and there is no timeline for developing a facility and obtaining proper permits. A Proposition 39 request was not submitted to GUSD.

3. ***EC* 47605(b)(1):** The school presents an unsound educational program for the pupils to be enrolled in the charter school.

Any of the above findings may be cause for denial of a charter under *EC* 47605(b).

Response from the Petitioners

The petitioners provided a written response to the findings of the local board and submitted it as part of the petition package. The response was considered during the review process.

Staff Findings on the International Studies Language Academy Charter Petition

Appeal to the Los Angeles County Board of Education

The Los Angeles County Board of Education (County Board) held a Public Hearing to determine support for the petition on January 19, 2016.

Five (5) stakeholders spoke in support of the charter: three (3) parents of students in Glendale schools and two (2) members of the petition development team who are also parents of students attending schools in Glendale. Additionally, the petitioners provided an electronic submission containing letters of support to the County Board.

Four (4) speakers from GUSD spoke against the charter: the GUSD Board Vice-President, the Co-Interim Superintendent, the Assistant Superintendent of Educational Services, and the Chief Business Officer.

LACOE Review Process

The Standard of Review is provided in Appendix 1 and is incorporated by reference.

FINDINGS OF FACT

Staff findings of fact adhere to guidance established in the *Education Code, California Code of Regulations, Title 5, County Board Policy, Superintendent's Administrative Regulations (AR)* and other requirements of law. *Words in italicized text indicate a direct reference to the language in these documents.*

Finding 1: The petition provides an unsound educational program for students to be enrolled in the school. [EC 47605(b)(1)]

Based on the guidance established in 5 CCR 11967.5.1(b), the charter petition presents an unsound educational program for the pupils who attend. The Review Team determined the petition lacks a clearly articulated instructional program and there is no identified core program in the middle school. It also fails to describe all core subjects within the four (4) target languages and the school's EL program.

Further details regarding these deficiencies are identified in Findings 2 and 5.

Finding 2: The petitioners are demonstrably unlikely to successfully implement the proposed educational program. [EC 47605(b)(2)]

5 CCR 11967.5.1(c)(1-4) provides four (4) indicators that the petitioners are unlikely to implement the proposed educational program.

Based on the review of the petition, supporting documents, and information obtained through the Capacity Interview with the school's leadership team, all four (4) indicators are present.

Indicator 1. The petitioner has a past history of involvement in charter schools that is considered unsuccessful.

In December 2015, the ISLA board entered into a service agreement with Academica California, LLC. During the Capacity Interview the petitioners indicated that Mr. David Calvo (CEO, Academica California) was one of the contributing authors of the petition and would continue to directly work with the petitioners as part of the service agreement to provide support in a variety of areas relating to school operations. The service agreement states that Academica will: *assist in the coordination of and attend the meetings of the Board; maintain the records of the school; coordinate with the accounting firm(s) selected by the board and serve as liaison with them; prepare annual budgets, financial forecasts, and other financial reports for the board's review; coordinate obtaining financing from private and public sources for loans desired by the board; coordinate regulatory professional development activities; identify and solicit investors to acquire and or develop schools sites for lease or use by the school; as well as perform other duties as directed by the board.*

Staff Findings on the International Studies Language Academy Charter Petition

A review of publicly-available documents shows that Academica and Mr. Calvo have a *past history of involvement in charter schools* that is considered *unsuccessful*:

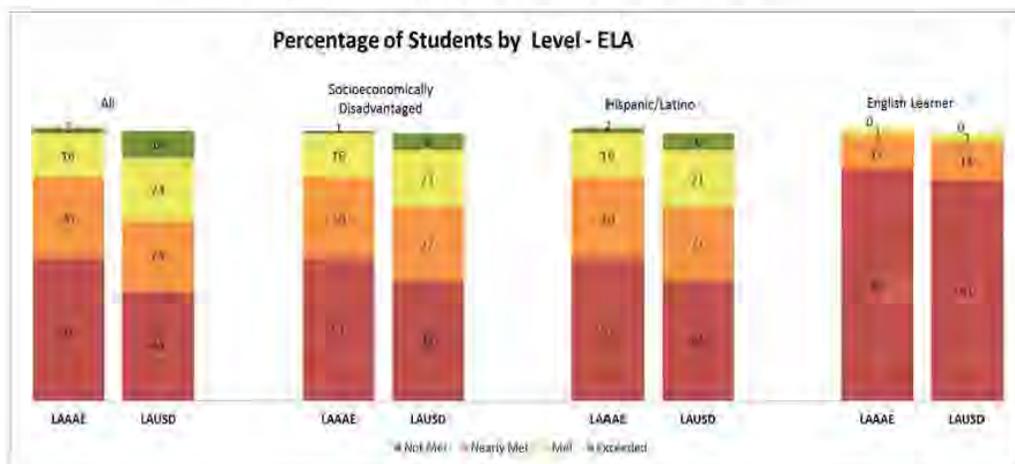
1. In 2014, the Miami-Herald reported that the U.S. Department of Education began an audit of Academica Corporation's operations in Florida. Specifically, there were allegations of potential conflicts of interest between Academica and charter schools it managed including the "Mater" schools in Miami-Dade County involving related-party transactions from 2007 to 2012. Mr. Calvo served as Principal of Mater Academy from May 2007 to May 2008 and served as a "Principal on Special Assignment" for Academica from June 2008 to June 2009.
2. Mr. Calvo served as Principal of Palm Bay Municipal Charter High School (Brevard County, FL) from July 2009 to June 2011; according to the list of closed charter schools in Florida, this school ceased operations due to fiscal concerns on June 30, 2011, after being operational for only two (2) years. Prior to closure, Brevard Public Schools contracted for a financial audit, which cited "major issues regarding the fiscal management" of the school.
3. Mr. Calvo served as the Principal of *Los Angeles Academy of Arts and Enterprise (LAAAE)*, grades 9-12, from February 2013 to September 2015. Academica provides services to this school. In February 2015, the LAAAE board minutes reflect a need to adjust the following items due to LAUSD concerns: (1) Bylaws; (2) Conflict of Interest Code; and (3) SELPA options.

Additionally, LAAAE failed to meet enrollment projection targets stated in its 2010-2015 renewal petition. The petition called for enrollment of 625 students in grades 6-12 by 2014-15; actual enrollment for that year was only 345 (45% below projections).

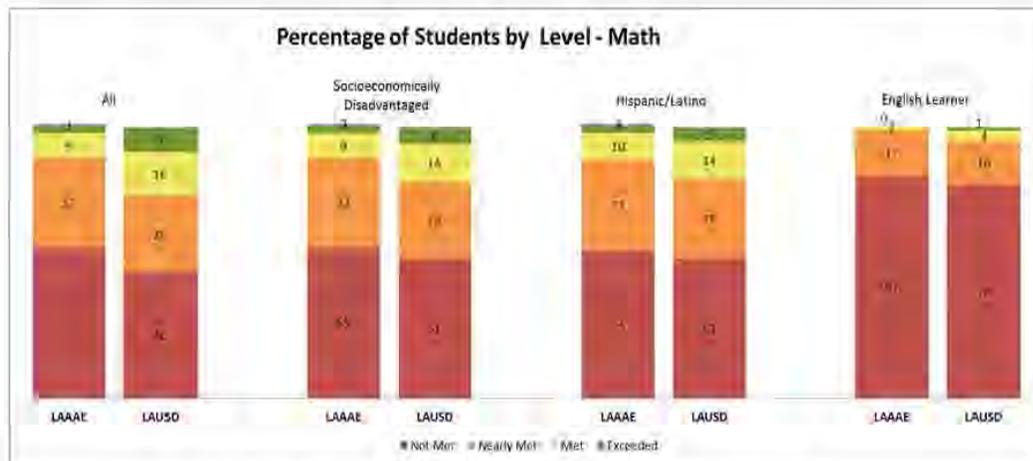
Academic summary data for LAAAE show that the 2013 Growth API was 701 and its weighted 3-year average Growth API was 653. The school's 2013 state rank was three (3), and the 2013 Similar Schools Rank was one (1). The 2015-16 Program Improvement (PI) status is Year 4.

LAAAE's Spring 2015 results on the California Assessment of Student Performance and Progress (CAASPP) show that, overall, students are underperforming in English-Language Arts (ELA) and mathematics both schoolwide and for all significant student groups compared to their peers within LAUSD. See chart below.

**2014-15 CAASPP Achievement Level Distribution
 Los Angeles Academy of Arts & Enterprise and LAUSD**



Staff Findings on the International Studies Language Academy Charter Petition



2015 CAASPP Research Files
 Source: <http://caaspp.ode.ca.gov/SB2015/ResearchFileList> as of 10-9-15. Retrieved 1-20-16

Indicator 2. *The petitioner is unfamiliar with the content of the petition or the requirements of law that would apply to the proposed charter school as described below.*

1. The Notice of Submission given by the petitioners indicate the school will provide Transitional Kindergarten (TK); however, the petition does not include any specific provisions or programmatic descriptions for a TK program.
2. The petitioners are not sufficiently familiar with how the school will monitor the academic growth of EL students within the dual immersion setting. The petition fails to describe appropriate state-required assessment methodology. It also fails to explain how students will be placed within structured EL classes during the regular school day.
3. They are not sufficiently familiar with the requirements of law regarding the Local Control Accountability Plan (LCAP), specifically with regard to the required metrics identified in the state's accountability program. Furthermore, the petition does not identify or describe the specific needs of foster or homeless youth, populations that must be addressed in the LCAP.
4. The petitioners are not familiar with current requirements of law regarding suspension and expulsion as described in Finding 5, Element 10. At the Capacity Interview, neither the petitioners, nor the members of the school's governing board, were able describe the school's suspension and expulsion policy or the board's role in the process. It was also stated that neither the board, nor the petitioners, reviewed the *EC* as it relates to pupil suspension and expulsion.
5. Various sections of the ISLA petition are identical to corresponding sections in LAAAE's 2015 charter renewal petition (dated December 19, 2014). Considering that LAAAE is a high school program, it is questionable why the petitioners chose to mirror some key components using this model for a TK-8 dual immersion school.

The ISLA petition contains multiple references to high school programmatic elements. For example, it mentions the California High School Exit Exam (CAHSEE) and supporting students with college applications. It provides the same descriptions of Engagement Strategies (citing strategies such as Chunk, Chew, Check; See/say, Mean, Matter (SMM) graphic organizers; and TIEAC power paragraphs) but does not elaborate on how these will benefit the two-way dual immersion TK-8 instructional program. This calls into question the ability of the petitioners to design an appropriate

Staff Findings on the International Studies Language Academy Charter Petition

educational program and further calls into question the authenticity of this charter petition relating to the proposed school.

Likewise the job qualifications for key personnel, including Principal, are strikingly similar, with minimal additions or word changes between the two (2) petitions. This is especially concerning due the specialized nature of ISLA's proposed curriculum and the level of expertise required to oversee successful implementation of the academic program.

Indicator 3. *The petitioner has presented an unrealistic operational plan for the proposed charter school. An unrealistic financial and operational plan is one to which there is evidence that any or all of the four (4) standards specified in state regulations are not met. ISLA failed to meet all four (4) standards as described below.*

1. *An unrealistic financial and operational plan is one to which there is evidence that any or all of the following applies:*

a. *In the area of administrative services, the charter, supporting documents, and/or the board and leadership team do not adequately describe the structure for providing administrative services, including, at a minimum, personnel transactions, accounting, and payroll that reflects an understanding of school business practices and expertise to carry out the necessary administrative services, or a reasonable plan and time line to develop and assemble such practices and expertise.*

The petitioners have contracted with a third-party vendor (Academica California, LLC) to provide operational functions on behalf of ISLA as noted above in Indicator 1.

The Fiscal Policies Handbook contains the following deficiencies:

- It does not clearly define the bidding process for purchases or contracts by Academica.
- Bank statements are mailed directly to Academica; the Principal only reviews the fundraising account bank reconciliation.
- There is a lack of internal control for bank check processing. Academica California processes all check requests and directly mails payments to payees. The process does not allow for the Principal to review all bank checks, which can result in fiscal mismanagement.

b. *For any contract services, describe criteria for the selection of a contractor or contractors that demonstrate necessary expertise and the procedure for selection of the contractor or contractors.*

The fiscal policies submitted with the petition do not define the formal process for the bidding, selection, and approval process for contractors and vendors. The process used by ISLA to award the service contract engaging Academica California is unknown.

2. *In the area of financial administration, the charter or supporting documents do not adequately*

a. *Include, at a minimum, the first-year operational budget, start-up costs, and cash flow, and financial projections for the first three years.*

To be fiscally solvent, the Budget Plan requires the school meets its enrollment and Average Daily Attendance (ADA) projections each year. The petition does not provide an adequate plan describing how the school intends to meet its enrollment projection. It does not offer demographic data to show that there is a sufficient pool of students that would support the stated enrollment targets to maintain fiscal solvency.

b. *Include in the operational budget reasonable estimates of all anticipated revenues and expenditures necessary to operate the school, including, but not limited to, special education,*

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based, when possible, on historical data from schools or school districts of similar type, size, and location.

The budget does not sufficiently account for expenditures, including those for personnel, benefits, books, reference materials, and back office management fees. The details are presented below under "Budget Plan Deficiencies."

- c. *Include budget notes that clearly describe assumptions on revenue estimates, including, but not limited to, the basis for average daily attendance estimates and staffing levels.*

ISLA proposes to recruit and enroll 438 students in its first year of operation with an increase to 1056 students by year five. There are unique considerations for a dual immersion program and students who desire to enter at non-traditional grade level starting points (i.e., other than starting in kindergarten or middle school).

The enrollment projection is unrealistic and assumes the ability to fill allocated seats each year. While the petition states that there is overwhelming demand for the district's Foreign Language Academies of Glendale (FLAG) programs that have to turn away potential participants, the petition does not delineate the potential demand for the grade levels and within all four (4) target languages to be served by the proposed charter school. Additionally, under the 90/10 model, students in kindergarten and first grade experience instruction conducted in the target language 90% of the time, and 10% in English. This percentage adjusts each year by 10% through grade five (with 50% of the instruction conducted in the target language and 50% in English). As such, students entering the elementary program in the various grade levels would need to demonstrate a certain level of target language proficiency in order to access the instruction and curriculum.

- d. *Present a budget that in its totality appears viable and over a period of no less than two years of operations provides for the amassing of a reserve equivalent to that required by law for a school district of similar size to the proposed charter school.*

The petitioners presented a budget without the amassing of a reserve. To be fiscally solvent, the Budget Plan requires that the school (1) meet its enrollment projections; (2) meet its Average Daily Attendance projections; and (3) secure a facility that does not exceed the budget's projected cost. Additionally, the budget relies on receipt of \$250,000 funding from the California School Finance Authority (Charter School Revolving Loan Fund).

An analysis of the deficiencies of the Budget Plan is presented below.

Budget Plan Deficiencies

- Underestimated certificated salaries by six (6) teachers in years one (1) through five (5), and accompanying personnel benefits.
- The line of credit of \$907,337 has not been secured for use of cash flow in the first year.
- California School Finance Authority (Charter School Revolving Loan Fund) is included as revenue of \$250,000, which should be used as a funding mechanism for cash flow purposes.
- Underestimated back office management fees for years two (2) through five (5).
- Overstatement of space rental/lease expense. Space rental is calculated as 17% of total revenues; however, the school's calculation of total revenues incorrectly includes a \$250,000 revolving loan and a \$907,337 line of credit.
- Costs for Books and other reference materials are understated from years two (2) through five (5).

Staff Findings on the International Studies Language Academy Charter Petition

- The agreement/contract for the lease of furniture, fixtures, and equipment was not provided.
- Underestimated advertising/recruitment expenditures for the first year.
- Educational Consultant – 1% of state revenues to be contracted with International Studies Charter School of Florida. During the Capacity Interview the petitioner stated the content of services was not negotiated. It is unclear what services this organization will be providing to the charter school. Over a five-year period, ISLA will pay \$292,449 services as yet to be determined.

Costs for Affiliation Agreement with the International Studies Charter School of Miami, Florida

FY 2016-2017	FY 2017-2018	FY 2018-2019	FY 2019-2020	FY 2020-2021
\$32,075	\$50,623	\$61,818	\$73,756	\$74,177

The following table illustrates a financial overview of the charter school's Net Income Projections and Ending Net Assets for the first four (4) fiscal years. The charter school will have an operating deficit for Fiscal Year (FY) two (2) through FY four (4), as described.

Net Income Projections

Budget Plan	FY 2016-2017	FY 2017-2018	FY 2018-2019	FY 2019-2020
Net Income Projections	\$644	\$(324,808)	\$(95,880)	\$68,853
Ending Net Assets	\$644	\$(324,164)	\$(420,044)	\$(351,191)

Note: BAS adjusted projections to add PCSGP grant

3. *In the area of insurance, the charter and supporting documents do not adequately provide for the acquisition of and budgeting for general liability, workers compensations, and other necessary insurance of the type and in the amounts required for an enterprise of similar purpose and circumstance.*

The petition and accompanying materials lack detail with concern to the types of insurance coverage and rate determinations. Additional information is necessary to determine if the budgeted amount will meet insurance obligations set forth by LACOE.

4. *In the area of facilities, the charter and supporting documents do not adequately describe the types and potential locations of facilities needed to operate the size and scope of the educational program proposed in the charter.*

The petition fails to identify a location for the school. It identifies the target area to be in southern Glendale, but it does not address whether there is any available inventory of possible school site locations appropriate to house a TK-8 charter school. The location must accommodate a school of over 1000 students by year five (5) of operation to include sufficient classroom space, playground/open space, offices, and ample parking with appropriate ingress/egress access.

The school will need to secure a facility within GUSD boundaries that can be ready for use at the start of the 2016-17 school year with the potential to meet enrollment and programmatic needs in future years. The site must have a Certificate of Occupancy or other certification demonstrating compliance with EC 47610(d).

Indicator 4. *The petitioners personally lack the necessary background in the following areas critical to the charter school's success, and the petitioners do not have a plan to secure the services of individuals who have the necessary background in curriculum, instruction, assessment and finance and business management.*

Staff Findings on the International Studies Language Academy Charter Petition

- ***Curriculum, instruction, assessment:*** There is no instructional leader in place for ISLA and the petition does not specify how the curriculum will be developed in the absence of an identified principal. While the petitioners have plans to recruit and hire school leaders in the future, they did not provide a timeline or identify potential candidates. The tasks of curriculum development in all core areas, in the four (4) target languages, developing an assessment system, a behavior support program and the Professional Development (PD) program to accompany these elements all rest on the Principal.

Based on their resumes, the petitioners do not personally have a background in curriculum, instruction, and assessment. At the Capacity Interview, the petitioners stated that there are educators on the ISLA Board; however, building curriculum and monitoring instruction are duties that are assigned to site administration and staff. Furthermore, it was stated that the petitioners would continue to rely on Mr. Calvo's expertise, yet there is no evidence to suggest that Mr. Calvo possesses expertise in a two-way dual-immersion model, and his most recent administrative experience is at the high school level (added concerns regarding his past history are detailed in Finding 2, Indicator 1).

At the Capacity Interview, Mr. Calvo answered a question regarding what assessments would be used to monitor and evaluate learning across content areas. He stated that the principal should be the one to develop this area for the school. When asked specifically about assessments that would be used to measure reading readiness and literacy development in English and the target language, petitioners could not identify specific assessments or frequency of administration.

Additionally, when asked about who will be responsible for plethora of PD topics listed in the petition, the petitioners stated that the principal will assess the needs and schedule PD accordingly. Considering the multiple programs and specialized curriculum proposed, a well-developed PD plan is needed to ensure effective implementation. Additionally, the budget only allocates \$10,000 for Training and Development in year 1.

An "affiliation agreement" with the International Studies Charter School is referenced in the petition as ISLA seeks to partner with this school regarding middle school curriculum. However, no affiliation agreement currently exists.

- ***Finance and business management:*** As referenced in Finding 2, Indicator 1, ISLA proposes to engage the services of an EMO with a *past history of involvement in charter schools* that is considered *unsuccessful*. The range of services to be provided by Academica is broad in scope and of critical importance to the operational and fiscal health of the school. Petitioners explained that Academica will have day-to-day operational involvement at ISLA with regard to supporting office staff and providing back office services. The petitioners rely heavily on Academica not only for services to be provided as part of the agreement, but also to procure third party vendors and contract proposals. It is unclear how Academica's performance will be regularly evaluated by the ISLA board.

Finding 3: The petition contains the required number of signatures. [EC 47605(b)(3)]

The petition is signed by a number of parents or legal guardians of pupils that is equivalent to at least one-half of the number of pupils that the charter school estimates will enroll in the school for its first year of operation.

The petition contained signatures of 292 parents/guardians who signed as being meaningfully interested in enrolling their students in the school. The CSO sent letters to 97 of these signatories with the purpose of determining the authenticity of their interest. Of these, 36 confirmed interest; two (2) letters were returned to sender. There was no response from the remaining 59 parents/guardians.

Finding 4: The petition contains an affirmation of all specified assurances. [EC 47605(b)(4); EC 47605(d)]

Staff Findings on the International Studies Language Academy Charter Petition

While the petition contains the required affirmation, a technical adjustment is required to align with *EC 220* to state that the proposed charter school shall not discriminate based on *gender identity* or *gender expression*.

Finding 5: The petition does not contain a reasonably comprehensive description of all required elements. [EC 47605(b)(5)(A)-(P)]

Based on the guidance established in *EC, 5 CCR*, the requirements set forth in the Superintendent's Administrative Regulations (AR) and other requirements of law, nine (9) of the 16 required elements are not reasonably comprehensive. The findings of the Review Team are as follows:

Element 1: Description of the Educational Program. *Not reasonably comprehensive*

1. The petition does not provide a sufficient description of *the target student population, which at a minimum must include grade levels, approximate numbers of pupils, and specific educational interests, backgrounds, or challenges* of the student population the school proposes to serve.
 - a. It provides a five-year projected enrollment plan by grade level, but does not explain or disaggregate the numbers of students projected for each of the four target language programs.
 - b. Furthermore, the petition states that "actual enrollment varying from noted projections shall not be considered a material revision of the charter"; however, this conflicts with LACOE's Memorandum of Understanding (MOU) requirement that increases/decreases by more than twenty (20) percent of the originally projected enrollment in the charter petition would require a material revision.
2. The petition lacks a *framework for instructional design that is aligned with the needs of the pupils that the charter school has identified as its target student population*.
 - a. The process for developing the complex elementary and middle school two-way dual immersion program for four target languages is not sufficiently described. Within the petition, there are references to the existing FLAG program at GUSD's Franklin Elementary and the middle school curricula employed by the International Studies Charter School in Miami, Florida. These are listed as model schools for immersion programs, however the specific components of each program and how they will be used at ISLA are not described.
 - b. The petition states the middle school curriculum will be based on the program at International Studies Charter School, which the school plans to access through an affiliation agreement; however, the affiliation agreement was not provided and is still in the negotiation phase. There is no elaboration of how ISLA would: (1) align the curriculum with Common Core State Standards and the International Baccalaureate (IB) framework; and (2) create a middle school program for the German language programs in both the immersion and acquisition models.
 - c. The petition states that ISLA intends to implement a two-way dual language program in which balanced numbers of native English speakers and native speakers of the partner language are integrated for instruction. It does not adequately describe assessments to identify ELs. For example, the Designation Criteria chart indicates that, for K-1 students, only Listening and Speaking CELDT scores will be used for initial identification. However, state and federal law requires all K-1 students to be assessed in all four (4) domains: Listening, Speaking, Reading, and Writing. Further, the Reclassification Chart does not include Reading, Writing, and Overall CELDT scores for Grades K-1. It is also missing the fourth criterion – Objective Assessment of Basic Skills for Grades K-2. The SBAC in ELA is listed as a reclassification criterion for grades K-2; however, the current state testing framework excludes these grade levels.

Staff Findings on the International Studies Language Academy Charter Petition

3. The petition contains an inadequate description of *the instructional approach or approaches the charter school will utilize, including, but not limited to, the curriculum and teaching methods (or a process for developing the curriculum and teaching methods) that will enable the school's pupils to master the content standards.*
 - a. The petition cites various frameworks for the teaching-learning process, including *Coalition of Essential Schools' 10 Common Principles*, Common Core, International Baccalaureate, Intentional Instruction, and engagement strategies. The petition does not clearly articulate how the various components of each of the frameworks will be prioritized and integrated into the overall instructional dual immersion program.
 - b. It states that curricula and instructional materials will be aligned to corresponding adopted standards. The accompanying descriptions for the curricular areas summarize learning outcomes, but do not specify the scope and sequence of standards/skills for each grade level nor do they identify proposed curriculum resources. The petition states that ISLA will incorporate instructional materials already identified and in use at Benjamin Franklin Elementary School and International Studies Charter School. The petition provides a limited list of sample instructional materials for the elementary level, but does not offer details regarding middle school. During the Capacity Interview, petitioners stated that the "affiliation agreement" with the International Studies Charter School is in development and described possible professional development, site visits, and access to curriculum. The lack of an articulated middle school curricula for all four proposed languages in both the immersion and acquisition tracks is inadequate to meet the needs of middle school students. For example, the petition describes an "Advisory" course for middle school students that does not appear on the "Curricular Progression for Middle School Grades" matrix. Additionally, the matrix provides for "English or Honors English" in grades 6-8. The petition does not describe the framework for the Honors program, nor criteria and expectations for student entry into this course.
 - c. It fails to detail why and how specific topics for professional development will be ascertained and how professional development will be ongoing to ensure successful implementation of multiple initiatives and meet the needs of all students. The petition lists many topics for professional development to include: (1) instructional strategies such as teacher modeling, scaffolding, questioning, group practice, and peer teaching; (2) assessment practices, data analysis, and standards integration; and (3) positive behavioral intervention and supports. These all occur within the overarching framework of the two-way dual immersion program for the four target languages. The petition states that "onsite coaching" will be provided for teachers, but does not indicate who will facilitate it or the frequency for the ongoing professional development strands.
4. The petition does not sufficiently indicate *how the charter school will identify and respond to the needs of pupils who are not achieving at or above expected levels.*

It does not address how students will be identified for strategic interventions, or how often students will be reassessed for regrouping within the intervention structure.
5. The petition lacks an adequate description of *how the charter school will meet the needs of students with disabilities, English learners, students achieving substantially above or below grade level expectations, and other special student populations*
 - a. English Learners: It is inconsistent in describing the delivery of EL programs and services.

ISLA seeks to serve a student population including 35% ELs, comprising a significant student group.

Providing target language instruction, such as Spanish or German, or bilingual instruction is not the same as immersing a student in English. For example, the petition describes a "horizontal strategic intervention" based on English proficiency during the English language time block when

Staff Findings on the International Studies Language Academy Charter Petition

ELs can be divided into a group “for remediation and/or intervention.” However, kindergarten students have an optional ELD strategic course after school and ELD is not listed on the Sample Elementary Master Schedule for students in grades 4-5, nor does this course appear on the Middle School Curricular Progression table.

Designated ELD must be offered within the regular instructional day, using appropriate ELD curriculum and instructional strategies designated for the specific, proficiency-level needs of EL students.

The petition does not reflect current law regarding the correct classification for identification and reclassification for ELs. For example, it states that the SBAC in ELA would be considered as a reclassification criteria for grades K-1; however, SBAC assessments are not administered in grades K-2.

The state priority outcome goals are not specific to meeting the needs of EL students. For example, the petition states that EL students will “advance in proficiency” but it does not indicate the criteria by which proficiency will be measured other than state that “growth will occur, and proficiency will be achieved by third year of enrolled in school.”

Expected challenges for newcomers and long-term English learners are not described; therefore, the petition cannot demonstrate that the needs of these students are understood and can be met.

- b. **Socioeconomically Disadvantaged:** It lacks specificity as to state priority outcome goals specific to the needs of socioeconomically disadvantaged students.

ISLA seeks to serve a population including 55% socioeconomically disadvantaged students; however, actions and services relating to this subgroup are identical to those for other subgroups. The petition states that the school will “establish a policy and progress monitoring system – counseling, financial, remediation, and otherwise – necessary to support the educational success of subgroups.” No specific actions or measurable outcomes are listed.

6. There are errors and inconsistencies regarding the *bell schedule, proposed school calendar, and the instructional minutes by grade level.*

The elementary bell schedule does not provide sufficient information to determine whether required instructional minutes are met. The schedule (p. 30) provides start times for recess and lunch, but no ending times or passing periods. Further, the minimum day schedule does not properly account for the lunch period.

The sample elementary master schedule does not include any physical education instructional minutes. The petition states that physical education will be offered in all grades; however, it fails to specify the intended allocation of minutes for physical education.

Element 2: Measurable Pupil Outcomes. *Not reasonably comprehensive*

The petition does not adequately specify the *skills, knowledge, and attitudes that reflect the school's educational objectives and can be assessed, at a minimum, by objective means that are frequent and sufficiently detailed enough to determine whether pupils are making satisfactory progress.*

1. *It is intended that the frequency of objective means of measuring pupil outcomes vary according to such factors as grade level, subject matter, the outcome of previous objective measurements, and information that may be collected from anecdotal sources.*
 - a. Not all required areas for the eight (8) state priorities are addressed as required by EC 52060.

Staff Findings on the International Studies Language Academy Charter Petition

- b. Outcomes are not measureable. For example, the petition states that “students reach high standards in visual and performing arts” without providing a metric or target proficiency rates. Some outcomes are stated as “baseline + growth” with no growth target given.
2. *To be sufficiently detailed, objective means of measuring pupil outcomes must be capable of being used readily to evaluate the effectiveness of and to modify instruction for individual students and for groups of students.*
 - a. The petition lists a multitude of possible instruments, but does not specify assessments to be given, nor the frequency of administration.
 - b. The descriptions of the measurable outcomes lack specificity. For example, it is unclear what assessments will be used in grades K-2 to monitor and evaluate learning across content areas or how reading readiness and literacy development in both English and the target language will be measured.
 - c. It does not specify what assessments will be used, in addition to the Smarter Balanced Assessment Consortium (SBAC), to monitor and evaluate students’ growth in English and the target languages in grades 3-8.
 - d. It does not disaggregate subgroups for specific expected annual measureable outcomes, rather “all students (schoolwide)” and “all subgroups” are given common outcomes without designated annual actions for specific subgroups.
 3. *Measurable outcomes must be based on data that can be verified by LACOE.*

Stated outcomes are not measurable. For example, to “strive for” is not meeting a target percentage. Additionally, specific instruments for measuring student achievement are not identified, but a general list of potential assessments is given. The petition does not describe how assessments will be chosen or how they will allow for articulation between grade levels and for cohort analysis with disaggregation of student subgroups.

Element 3: Method for Measuring Pupil Progress. *Not reasonably comprehensive*

1. The petition does not utilize *a variety of assessment tools that are appropriate to the skills, knowledge, or attitudes being assessed, including, at minimum, tools that employ objective means of assessment consistent with the measurable pupil outcomes.*
 - a. Specific formative assessments for the middle school are not identified to measure student progress toward meeting IB program goals.
 - b. It states that “state optional tests” such as the SBAC Interim Assessment Block and Interim Comprehensive Assessment will be used; however, these do not apply to grades K-2.
 - c. There are no corresponding measurable pupil outcomes for all required subgroups including foster youth.
 - d. It does not state how rubrics, standardized scoring processes, or proficiency levels will be defined nor who will monitor consistency in data reporting procedures.
 - e. References to CAHSEE and Common Core aligned final examinations for secondary grades are inappropriately made. High school metrics are not consistent with the grade level span to be served by this proposed charter school.
2. The petition fails to outline an adequate *plan for collecting, analyzing, and reporting data on pupil achievement to school staff and to pupils’ parents and guardians, and for utilizing the data continuously to monitor and improve the charter school’s educational program.*

Staff Findings on the International Studies Language Academy Charter Petition

- a. It fails to describe a progress reporting system and grading policy, stating only that the faculty and principal will develop them without elaboration as to the frequency, methodology, or communication of student achievement.
- b. It fails to specify how parents/guardians with a home language other than English or one of the four target languages will be informed of their students' progress.

Element 4: Governance Structure. *Not reasonably comprehensive*

1. The bylaws and articles of incorporation are inconsistent with regard to members. The signed articles of incorporation state that the corporation has no members; however, the bylaws provide for a class of members. At the Capacity Interview, the ISLA board reaffirmed there are no members and acknowledged this incongruence, stating that bylaws would need to be updated.
2. The bylaws permit meetings to be held without adhering to *Brown Act* posting, access, and agenda requirements. The petition and information obtained in the Capacity Interview fail to show that all members of the governing board understand compliance with laws applicable to charter school governance including the *Brown Act*.
3. The petition does not comport with California *Nonprofit Corporations Code* by providing for ex-officio non-voting members on the Board.
4. The Conflict of Interest policy does not comply with County Board Policy 0420.4. Specifically, it allows the school principal to circumvent Government Code section 1090 by determining that a particular consultant may not be required to fully comply with disclosure requirements.

ISLA proposes to enter into an affiliation agreement with the Miami-based International Studies Charter School (which also has Academics as its service provider), at an amount equal to 1% of ISLA's annual revenue. The petition states that International Studies charter School has "offered curricula, instructional strategies support and other best practices" to ISLA. However, no copy of an ISLA Board-approved agreement for such services was provided. There may be a duplication of similar services in ISLA's contract with Academics California, which states that Academics "may identify and or [sic] develop curricula."

5. The petition fails to include *evidence that the organizational and technical designs of the governance structure reflect a seriousness of purpose necessary to ensure that:*
 - a. *The charter school will become and remain a viable enterprise.*
 - i. The petition and accompanying information stated at the Capacity Interview do not clearly describe the relationship between the ISLA and Academics. Additionally, the relationship between the larger Academics network and Academics California is unclear.
 - ii. Based on the scope of services to be provided by Academics California (as outlined in the contract executed by ISLA's Board in December 2015), there is no clear delineation between which Academics network staff would be servicing ISLA and whether these individuals will have an understanding of the complexities involved with California's unique structures and policies (e.g., LCFF funding). The budget was prepared under the guidance of Academics Nevada's Director of Growth & Development, who also participated in the Capacity Interview.

As stated in the Capacity Interview, Academics California has three (3) full-time employees, but representatives indicated that staff from the Las Vegas and Miami offices can support organizations in California. It is unclear whether services provided by these additional offices would be included in the existing scope of the Academics California contract as it is written, or whether additional Academics-affiliated consultants would be hired.

Staff Findings on the International Studies Language Academy Charter Petition

As a for-profit company, Academica's financial records are not publicly available. It is unclear how Academica California operates independently or as part of the larger network of this company.

- b. *There will be active and effective representation of interested parties, including, but not limited to parents (guardians).*

The petition does not describe the roles, formation, and implementation of a School Site Council, which is required for schools receiving federal funds.

- c. *The petition does not contain an organizational chart that accurately reflects the reporting structure of the governing board, ancillary boards, and each category of school employees as specified in Superintendent's AR.*

Key positions are not identified on the organizational chart and it does not delineate the chain of command or a reporting structure.

Furthermore, the organizational chart does not reflect an understanding of the role of the authorizer within the governance structure. The petition inaccurately places the potential authorizer's board of education at the top of the organizational chart, reflecting a structure of direct authority over decisions and staff of the independent charter school.

Element 5: Employee Qualifications. *Not reasonably comprehensive*

1. *The petition does not identify the various categories of employees the school anticipates (e.g., administrative, instructional, instructional support, non-instructional support) ...sufficient to ensure the health, and safety of the school's faculty, staff, and pupils.*

The organizational chart does not describe all categories of employees in the petition as stated above in Element 4: Governance Structure. It is unclear which employees would fall into the generalized categories of "Administration" or "Faculty and Staff" and the reporting structure therein. Furthermore, key positions such as the Director of Curriculum & Instruction and Special Education Coordinator are referenced in the petition, but not listed on the chart.

2. *The petition does not identify those positions that the charter school regards as key in each category and specify the additional qualifications expected of individuals assigned to those positions.*

- a. *The credential qualifications for teachers do not demonstrate an understanding of credential needs for the various grade levels and subjects within the instructional settings.*

- b. *The job description for Principal is inadequate for the instructional model of the proposed school's two-way dual immersion model.*

- c. *The position of Counselor is listed as a key position, but would not begin until the fourth year of school operation. The petition fails to provide a plan to provide appropriate coverage of these important duties to service the students in the first three years of operation. Also, one of the listed duties for the Counselor is to "assist students with institutions of higher education processes such as college applications and financial aid." It is unclear why the petitioners included high school job functions for the proposed elementary/middle school program.*

- d. *Furthermore, the petition states that faculty and staff should expect multiple obligations (teacher-counselor-manager). The teacher job description does not require knowledge or experience in counseling or guidance techniques, nor does the professional development plan address training in these areas. Within the job description for teachers, the petition notes that "master teachers" will mentor "rookie and preservice" teachers; however, the petition fails to identify the minimum level of experience or differentiate duties for master teachers.*

Staff Findings on the International Studies Language Academy Charter Petition

- e. The education and experience requirements for Office Manager appear inadequate for the scope of this job. This position description contains many job duties that directly impact the budgetary and compliance health of the school, including: assisting in budget and audit development, coordinating payroll transactions; monitoring free/reduced lunch applications; coding invoices/statements; reconciling check register; contacting vendors and financial institutions to resolve problems. Additionally, this position will advise the principal on internal compliance, account balances, audit findings, and site policies/procedures relating to accounting and fiscal management. The only education requirement for this position is possession of a high school diploma or GED.

Element 6: Health and Safety Procedures. *Reasonably comprehensive*

Element 7: Means to Achieve a Reflective Racial and Ethnic Balance. *Not reasonably comprehensive*

1. *Recognizing the limitations on admissions to charter schools imposed by EC section 47605(d), the petition contains specific information indicating the racial and ethnic composition of the general population residing within the territorial jurisdiction of the school district in which the charter will be located will not be attained by the charter school.*
 - a. The petition lacks data regarding the racial and ethnic composition of the general population residing within the geographic boundaries of the school district.
 - b. A generalized recruitment list of activities is given without explanation as to how native target language speakers versus non-speakers will be recruited in a manner that will allow for racial and ethnic diversity. Due to the unique programmatic needs of the dual language programs, specific outreach strategies for identifying areas of recruitment within the GUSD target area in each of the four (4) target languages are not delineated.
 - c. The petition states that the school anticipates translating recruitment documents in the target languages; it does not indicate whether materials will be available in other languages that are prevalent within Glendale (specifically Armenian). Per 5 CCR 11316, public schools must provide *all notices and other communications to parents or guardians in their primary language* if 15% or more of the pupils enrolled speak that language. See language table for GUSD below.

Staff Findings on the International Studies Language Academy Charter Petition

GUSD Language Group Data for 2014-15

Language*	Number of English Learners (EL)	Number of Fluent English Proficient (FEP) Students	Total Number of EL and FEP Students (FEP) Students	Percent of Total Enrollment that is EL and FEP
Armenian	3,309	4,091	7,400	28.28%
Spanish	1,461	1,928	3,389	12.95%
Korean	531	1,188	1,719	6.57%
Filipino (Pilipino/Tagalog)	226	463	689	2.63%
Arabic	204	109	313	1.20%
Russian	89	72	161	0.62%
Japanese	99	38	137	0.52%
Farsi (Persian)	60	41	101	0.39%
German	18	42	60	0.23%
French	30	24	54	0.21%
Bengali	26	26	52	0.20%
Mandarin	17	32	49	0.19%
Thai	22	23	45	0.17%
Vietnamese	9	32	41	0.16%
Italian	18	23	41	0.16%
Telugu	20	16	36	0.14%
Hindi	15	14	29	0.11%
Portuguese	13	14	27	0.10%
Other (non-English)	31	48	79	0.30%

*Languages representing less than 0.10% of total enrollment are not included in this table.
 Source: CDE DataQuest, English learners, Language Group Data Districtwide 2014-15. Retrieved 2-8-15

Element 8: Admission Requirements. *Not reasonably comprehensive*

1. The admission requirements are not in keeping with EC 47605(b)(5)(H).
 - a. The petition does not describe the contents or include a copy of the application form, which is described as a necessary component of the enrollment process.
 - b. The petition does not align with EC 47605(d)(2)(B), as it provides admission preferences for children of school employees and founders before pupils who reside within GUSD.
 - c. The petition does not indicate how homeless and foster students will be identified as part of the enrollment process.
 - d. The petition calls for “additional language assessment/testing” in the target language to determine a student’s eligibility for entry in grades 2-5. There is no description of the process by which students will be assessed, including the test instrument(s), minimum necessary proficiency level, or qualified test administrator. This statement also conflicts with petitioners’ comments at the Capacity Interview indicating that students would not be tested prior to admission.
 - e. The petition indicates *stated preferences* for founders that *are not clearly defined*. The petition states that the founders will be designated by governing board policy to include persons who “contributed substantial personal time, effort and resources, prior to or during the first year of operation.” To ensure compliance with the guidelines of the PCSGP, this definition needs to be set.
 - **Founding Period** – The petition does not align with BP 0420.4, which requires that the *school may not add to the founding group after the first day of instruction*. The petitioners failed to address this requirement in the section entitled, “Changes to Reflect the County Board as Authorizer.”
 - f. *The process for conducting the lottery is not clearly defined and/or observable*. The process for conducting the multiple lotteries required due to admissions preferences, grade level capacity, and the four language programs is not adequately described. The procedures as described in the petition

Staff Findings on the International Studies Language Academy Charter Petition

do not specify the order in which these various lotteries will occur, or how students who might want to enter multiple lotteries would be afforded this opportunity. For example, if a student who communicates in a target language is not selected in that respective lottery pool there is no description of a process whereby the student could elect to enter a lottery pool as a target language non-speaker in a different language program.

Element 9: Annual Independent Financial Audits. Reasonably comprehensive with a specific deficiency

The petition lacks the following statement determined by the LACOE Business Advisory Services as necessary for the element to be considered reasonably comprehensive:

Financial reporting to charter agency would be carried out pursuant to EC 47604.33.

Element 10: Suspension and Expulsion Procedures. Not reasonably comprehensive

1. The petition does not *identify a preliminary list, subject to later revision pursuant to subparagraph (E), of the offenses for which students in the charter school must (where non-discretionary) and may (where discretionary) be suspended and, separately, the offenses for which students in the charter school must (where non-discretionary) or may (where discretionary) be expelled, providing evidence that the petitioner reviewed the offenses for which students must or may be suspended or expelled in non-charter public schools.*
 - a. Although the petition's listing of offenses appears to align closely with *EC*, it is not consistent with *EC 48900(k)(2)*, which indicates that students enrolled in grades K-3 shall not be suspended for willful defiance, nor shall willful defiance be grounds for expulsion in grades K-12.
 - b. The petition lists offenses for additional discretionary suspension/expulsion for all students, which only apply to students in grades 4-12.
 - c. The petition does not identify separate criteria to determine when a violation is considered a discretionary suspendable act or a discretionary expellable act.
 - d. The procedure for initially recommending expulsion does not consider whether other means of correction are not feasible, have failed, or if the student poses a continuing danger to the physical safety of the pupil or others.
 - e. The petition references the federal Gun Free Schools Act of 1994, but does not include the pertinent language stating that, on a case-by-case basis, the one year expulsion requirement can be modified.
 - f. The petition states that students who are expelled shall be responsible for seeking alternative education programs; however, this is inconsistent with the requirement that the school **shall** be responsible for finding an appropriate alternative placement pursuant to *EC 48915(f)*.
2. The petition does not *identify the procedures by which parents, guardians, and pupils will be informed about reasons for suspension or expulsion and of their due process rights in regards to suspension or expulsion.*
 - a. The petition does not specify the process to determine when a case would be referred to the Administrative Panel versus going directly to the Board. The petition states that a student may be expelled either after a hearing by the Governing Board or upon the recommendation of an Administrative Panel to be assigned by the Governing Board, as needed. The petition specifically excludes "a teacher of the student or any member of the Governing Board" from the Panel. If the Principal is recommending expulsion and is part of the Administrative Panel, this would not constitute due process.
 - b. The procedures for the Board's final decision to expel do not specify a timeline by which parents/guardians shall receive written notification.

Staff Findings on the International Studies Language Academy Charter Petition

- c. The procedure for expulsion does not identify procedures for notifications regarding foster or homeless youth.

Element 11: STRS, PERS, and Social Security. *Reasonably comprehensive*

Element 12: Public School Attendance Alternatives. *Reasonably comprehensive*

Element 13: Post-Employment Rights of Employees. *Reasonably comprehensive*

Element 14: Dispute Resolution Procedures. *Reasonably comprehensive with a specific deficiency*

The petition fails to *describe how the costs of the dispute resolution process, if needed, would be funded.*

Element 15: Exclusive Public Employer. *Reasonably comprehensive*

Element 16: Closure Procedures. *Not reasonably comprehensive*

1. The petition fails to *designate a responsible entity to conduct closure-related activities.*
2. The petition does not list *the name(s) of and contact information for the person(s) to whom reasonable inquiries may be made regarding the closure.*
3. The petition does not sufficiently describe the process for the *transfer and maintenance of state assessment results and special education records.*
4. The petition does not sufficiently describe the process for the *transfer and maintenance of personnel records.*

Finding 6: The petition does not satisfy all of the Required Assurances of Education Code section 47605(c), (e) through (j), (l), and (m) as follows:

Standards, Assessments and Parent Consultation. [EC 47605(c)] *Meets the condition*

Specific deficiencies for this condition are described in Findings 2 and 5.

Employment is Voluntary. [EC 47605(e)] *Not applicable*

Pupil Attendance is Voluntary. [EC 47605(f)] *Not applicable*

Effect on the Authorizer and Financial Projections. [EC 47605(g)] *Does not provide the necessary evidence*

1. The petition does not describe *the facilities to be used by the charter school including where the school intends to locate.*

The petition does not identify any potential physical addresses for a facility to be used. See Finding 2, Indicator 3.

2. The petition does not describe *the manner in which administrative services of the school are to be provided.*

The school proposes to enter into an affiliation agreement with International Studies Charter School in Miami, Florida for support, curriculum and the development of best practices. The details for the affiliation agreement have not been finalized. At this time, it is unclear what curriculum will be used at the middle school.

Staff Findings on the International Studies Language Academy Charter Petition

The petition specifically identifies Academica as the provider of back office services. Concerns regarding fiscal mismanagement in schools serviced by Academica that show a *past history of involvement in charter schools* that is considered *unsuccessful* is detailed in Finding 2, Indicator 1.

3. The petition does not provide *financial statements that include a proposed first-year operational budget, including startup costs, and cash-flow and financial projections for the first three years of operation.*

The necessary financial statements were included but are deficient as identified in Finding 2, Indicator 3.

Preference to Academically Low Performing Students. [EC 47605(h)] Does not qualify for the preference

The petition does not *demonstrate the capability to provide comprehensive learning experiences to pupils identified by the petitioners as academically low achieving.* It does not provide sufficient detail regarding the intervention programs the school will use with those academically low performing students as required by EC 47605(h). Specific deficiencies regarding the intervention programs are described in Findings 2 and 5.

The target population is Glendale, and GUSD's elementary and middle schools have 2013 Growth API scores ranging from 820 to 948. See Background Information, page 1.

Teacher Credentialing Requirement. [EC 47605(l)] *Meets the condition*

The petition states that all teachers will hold California credentials; however, concerns exist regarding the petitioners' understanding of specific credential requirements for middle school. See Finding 5, Element 5.

Transmission of Audit Report. [EC 47605(m)] *Meets the condition*

Staff Findings on the International Studies Language Academy Charter Petition

Appendix 1

Los Angeles County Office of Education Standard of Review

Review Criteria: The Los Angeles County Office of Education (LACOE) Charter School Review Team (Review Team) considered the petition according to the requirements of the *EC* and other pertinent laws, guidance established in 5 *CCR*, *County Board Policy (BP)* and Superintendent's *Administrative Regulations (AR)*.¹

LACOE has adopted the petition review criteria established in 5 *CCR* 11967.5.1(a-g) except where LACOE determined that the regulations provide insufficient direction or where they are not applicable because the structure or responsibility of the County Board and LACOE differ from those of the State Board of Education (SBE) and the California Department of Education (CDE). In these instances, LACOE developed its own (local) review criteria or added criteria to those developed by CDE to reflect the needs of the County Board as the authorizer and LACOE as the monitoring and oversight agency.

Reasonably Comprehensive: In addition to the regulatory guidance that specifies the components of each required element, 5 *CCR* 11967.5.1(g) states a "reasonably comprehensive" description of the required petition elements shall include, but not be limited to, information that:

1. *Is substantive and is not, for example, a listing of topics with little elaboration.*
2. *For elements that have multiple aspects, addresses essentially all aspects of the elements, not just selected aspects.*
3. *Is specific to the charter petition being proposed, not to charter schools or charter petitions generally.*
4. *Describes, as applicable among the different elements, how the charter school will:*
 - a. *Improve pupil learning.*
 - b. *Increase learning opportunities for its pupils, particularly pupils who have been identified as academically low achieving.*
 - c. *Provide parents, guardians, and pupils with expanded educational opportunities.*
 - d. *Hold itself accountable for measurable, performance based pupil outcomes.*
 - e. *Provide vigorous competition with other public school options available to parents, guardians, and students.*

Reasonably Comprehensive with Deficiencies: An element may be reasonably comprehensive but lack specific critical information or contain an error important enough to warrant correction. These elements are described as "reasonably comprehensive" with a specific "deficiency" or "deficiencies." Correcting the deficiency or deficiencies would not be a material revision (as defined in statute and County Board Policy) to the charter.

Technical Adjustments: Three (3) circumstances may require a "technical adjustment" to the petition:

1. Adjustments necessary to reflect the County Board as the authorizer. These adjustments are necessary because the petition was initially submitted to a local district and contains specific references to and/or language required by that district and/or the petition does not reflect the structure of the County Office.
2. Adjustments needed to bring the petition current with changes made to law since the petition was submitted. This includes adjustments necessary to comply with the *Charter School Act* effective July 1, 2013, as the result of *Assembly Bill (AB) 97* (Local Control Funding Formula).

¹ Words in italics indicate a direct reference to the language in these documents.

Staff Findings on the International Studies Language Academy Charter Petition

3. Adjustments necessary to address clerical errors or inconsistencies where making the adjustment would not be a material revision (as defined in statute and *County BP*) to the charter.

Affirmations and Assurances: *The petition shall contain a clear, unequivocal affirmation of each requirement, not a general statement of intention to comply. Neither the charter nor any of the supporting documents shall include any evidence that the charter will fail to comply with the conditions described in EC section 47605(c-f, l and m).*

Reviewers: The Review Team included staff from the Controller's Office, Business Advisory Services, Facilities and Construction, Risk Management, Curriculum and Instruction, Special Education, Student Support Services, Human Resources, the Office of General Counsel, and the Division of Accountability, Support and Monitoring, including the Charter School Office.

Scope of Review: Findings are based on a review of the submitted renewal petition and supporting documents, information obtained through the Capacity Interview and other communications with the petitioners and representatives of the school, and other publicly available information.

Legislative Intent: The Review Team considered whether the petition complies with EC 47601 of the *Charter Schools Act*, which states:

It is the intent of the Legislature, in enacting this part, to provide opportunities for teachers, parents, pupils, and community members to establish and maintain schools that operate independently from the existing school district structure, as a method to accomplish all of the following:

- (a) Improve pupil learning.*
- (b) Increase learning opportunities for all pupils, with special emphasis on expanded learning experiences for pupils who are identified as academically low achieving.*
- (c) Encourage the use of different and innovative teaching methods.*
- (d) Create new professional opportunities for teachers, including the opportunity to be responsible for the learning program at the school site.*
- (e) Provide parents and pupils with expanded choices in the types of educational opportunities that are available within the public school system.*
- (f) Hold the schools established under this part accountable for meeting measurable pupil outcomes, and provide the schools with a method to change from rule-based to performance-based accountability systems.*

Kelly O'Brien

From: Law_Jean <Law_Jean@lacoed.edu>
Sent: Wednesday, February 17, 2016 9:05 AM
To: Hilary Stern
Cc: Gillian Bonacci
Subject: RE: ISLA Denial Letter

Good morning, Hilary:

The Charter School Office will send you written confirmation of the Board's decision once we receive the materials from the Board Secretary, which is usually the Friday of the week of the Board meeting. You will receive notification via email, but also a hard copy will be mailed.

Regards,
Jean

-----Original Message-----

From: Hilary Stern [mailto:hilary_stern@hotmail.com]
Sent: Wednesday, February 17, 2016 7:59 AM
To: Law_Jean
Cc: Gillian Bonacci
Subject: ISLA Denial Letter

Good Morning Jean!

Can you please email me a signed letter confirming LACOE's denial of the ISLA petition by this afternoon?

I look forward to hearing from you.

Hilary Stern

Kelly O'Brien

From: Gillian Bonacci <gsharp1@pacbell.net>
Sent: Tuesday, February 16, 2016 1:05 PM
To: Saenz_Thomas@lacoed.edu; Boyd_Douglas@lacoed.edu; Braude_Katie@lacoed.edu; Holt_Gabriella@lacoed.edu; Johnson_Alex@lacoed.edu; Perez_Monte@lacoed.edu; Turrentine_Rebecca@lacoed.edu
Cc: Hilary Stern; David Calvo
Subject: Response to Staff Findings for ISLA

February 16, 2016

Mr. Thomas A. Saenz, President
Members of the Board of Education
Los Angeles County Office of Education
9300 Imperial Highway
Downey, CA 90242

Dear Mr. Saenz and Members of the Board of Education:

I am writing to you prior to your official determination on the International Studies Language Academy petition which is scheduled to be heard for final action at tonight's Los Angeles County Office of Education Board meeting. I wanted to thank staff for doing a thorough review of the petition but I feel it is important that I express to you our concerns with their findings in the event that we do not have adequate time to properly address the findings in the meeting. Accordingly, below is a brief statement of our general concerns, which are grouped by category.

1) Expectations above and beyond those which are standard for the review of a petition.

We strongly feel that a majority of Staff's findings include representations of petition components that go above and beyond expectations that are normally in line with charter petitions. Examples of these include, but are not limited to: not identifying an instructional leader, not including a full scope-and-sequence of standards and skills per grade level and bell schedule in the petition, alleged insufficient progress monitoring descriptions for ELs, and the use of LCAP narrative versus metrics for a pre-LCAP. Petition components were questioned simply because pedagogy cited was similar to other charter school petitions. Staff also characterizes the board members inability to recite from memory Education Code or policies as being "not familiar with" requirements of law. Typically, charter petitions don't have to include such detailed policies or processes in a petition. However, this does not mean that these details have not been contemplated by the petitioners. These are inaccurate Staff conclusions made without requesting clarification on this information via MOU or during the capacity interview.

2) Requirements that do not apply to charter schools, or are not typically included in charter petitions.

Staff including several findings to support their recommendation for denial that are not typically required or included in charter petitions. Examples of these include, but are not limited to: charter schools do not have to identify a facility in the petition (although the requirement for a lease agreement prior to authorization is not possible, we have demonstrated that we have the means to sign one upon authorization), a specific plan for a *stand alone* transitional kindergarten program, listing every subgroup in the LCFF table when goals are noted to apply school wide and for all subgroups, finding an alternative placement for expelled students, supplying

minimum or maximum insurance requirements, and providing a sample admission application. Yet, each of these aforementioned items are noted as potential reasons for denial.

3) Actual shortcomings identified by LACOE.

While we take these very seriously, they include minor word changes or semantic clarifications and should not result in a denial recommendation but rather a Staff recommendation for technical revisions. This would include the changes to Bylaws and other items in the Governance section, revising EL reclassification criteria for students in grades K-1, and clarifying statements regarding willful defiance. We also recognized that there were some changes to be made to the budget which were addressed both in the rebuttal to GUSD and at the capacity interview.

I want to also bring to your attention that there were surprising mischaracterizations articulated in Staff's findings that we believe may have been prejudicial. These include: 1) incorporating improper standards for review; 2) attributing negative records to Academica and Mr. Calvo; whereas both have a demonstrable track record of success (Academica, for instance, collectively coordinated 380 million in revenue for its clients last year. Moreover, Academica's financial guidance has yielded a collective 200 million in net assets for its clients. Regarding LAAAE, the vast majority of incoming students enter LAAAE performing far below grade level. A simple disaggregation by grade of the data provided by LACOE will demonstrate Mr. Calvo's success at intervention. ELA growth is documented from 5th percentile to 40th percentile and the growth is even larger in math. The sixth grade math proficiency ranks from fifth percentile with their LAUSD peers to the eleventh grade students' ranking an astonishing 93rd percentile); 3) erroneously describing Academica as an EMO, whereas it is a back office service provider; 4) statements of missing program components, outreach strategy, fiscal controls or excluded language that is clearly documented within the petition; 5) incorrect staff budget assumptions; 6) inaccurate staff teacher count; 7) failure to recognize charter school, education, and language acquisition and curriculum expertise among petitioners (for instance, ISLA's development team includes Dr. Simona Montanari who developed the dual language immersion GUSD curricula and attended the capacity interview); and 8) statements that noted engagement strategies are not suited for ISLA's grade ranges.

We believe that if the mischaracterizations are corrected and the criteria imposed by Staff that are not customary for petition review are removed, what is left is a strong petition that can be make stronger with technical revisions. We hope you will give us the opportunity to make the technical revisions and look forward to working with LACOE to ensure our students are well served.

Thank you for your time.

Signed,



Gillian Bonacci
Co-Lead Petition
on behalf of the Petitioners of ISLA