# CHARTER SCHOOL PETITION REVIEW FORM:Rocketship San Pablo Elementary

CALIFORNIA DEPARTMENT OF EDUCATION

## Key Information Regarding Rocketship San Pablo Elementary

### Proposed Grade Span and Build-out Plan

#### Table 1: 2019–2020 Proposed Enrollment

TK–transitional kindergarten/K–kindergarten

NA–Not Applicable. Grade levels not served.

| Grade | 2019–2020 | 2020–21 | 2021–22 | 2022–23 | 2023–24 |
| --- | --- | --- | --- | --- | --- |
| TK | 50 | 50 | 50 | 50 | 50 |
| K | 112 | 112 | 112 | 112 | 112 |
|  1 | 56 | 112 | 112 | 112 | 112 |
|  2 | 56 | 56 | 112 | 112 | 112 |
|  3 | 56 | 56 | 56 | 100 | 100 |
|  4 | 56 | 51 | 51 | 51 | 84 |
|  5 | NA | 51 | 46 | 30 | 30 |
|  6 | NA | NA | NA | NA | NA |
|  7 | NA | NA | NA | NA | NA |
|  8 | NA | NA | NA | NA | NA |
|  9 | NA | NA | NA | NA | NA |
| 10 | NA | NA | NA | NA | NA |
| 11 | NA | NA | NA | NA | NA |
| 12 | NA | NA | NA | NA | NA |
| Total | 386 | 488 | 539 | 567 | 600 |

### Proposed Location

Rocketship San Pablo Elementary (RSPE) will be located in close proximity to community colleges and public transportation central to serve the families of the Iron Triangle in San Pablo and Central Richmond (Attachment 3, p. 150).

### Brief History

On October 18, 2017, the petitioners submitted the RSPE petition to the West Contra Costa Unified School District (WCCUSD). On November 15, 2017, WCCUSD voted to deny the RSPE petition by a vote of three to two. On February 13, 2018, the petitioners submitted the RSPE petition to the Contra Costa County Office of Education (CCCOE). On May 25, 2018, Contra Costa County Board of Education (CCCBOE) voted to deny the RSPE petition by a vote of three to two.

On May 29, 2018, the petitioners submitted the RSPE petition to the State Board of Education (SBE).

### Lead Petitioner

Marie Issa Gil, Rocketship Bay Area Regional Director

## SUMMARY OF REQUIRED CHARTER ELEMENTS PURSUANT TO CALIFORNIA *EDUCATION CODE* SECTION 47605(b)

NA–Not Applicable

| **Charter Requirements Pursuant to California*****Education Code* Section 47605(b)** | **Meets Requirements** |
| --- | --- |
| Sound Educational Practice (California *Education Code* [*EC*] sections 47605[b] and [b][1]) | Yes |
| Ability to Successfully Implement the Intended Program (*EC* Section 47605[b][2]) | No |
| Required Number of Signatures (*EC* Section 47605[b][3]) | Yes |
| Affirmation of Specified Conditions (*EC* sections 47605[b][4] and [d]) | Yes |
| Exclusive Public School Employer (*EC* Section 47605[b][6]) | Yes |
| 1. Description of Educational Program (*EC* Section 47605[b][5][A])
 | No |
| 1. Measurable Pupil Outcomes (*EC* Section 47605[b][5][B])
 | No |
| 1. Method for Measuring Pupil Progress (*EC* Section 47605[b][5][C])
 | Yes |
| 1. Governance Structure (*EC* Section 47605[b][5][D])
 | Yes |
| 1. Employee Qualifications (*EC* Section 47605[b][5][E])
 | No |
| 1. Health and Safety Procedures (*EC* Section 47605[b][5][F])
 | No |
| 1. Racial and Ethnic Balance (*EC* Section 47605[b][5][G])
 | Yes |
| 1. Admission Requirements (*EC* Section 47605[b][5][H])
 | Yes |
| 1. Annual Independent Financial Audits (*EC* Section 47605[b][5][I])
 | Yes |
| 1. Suspension and Expulsion Procedures (*EC* Section 47605[b][5][J])
 | No |
| 1. Retirement Coverage (*EC* Section 47605[b][5][K])
 | Yes |
| 1. Public School Attendance Alternatives (*EC* Section 47605[b][5][L])
 | Yes |
| 1. Post-employment Rights of Employees (*EC* Section 47605[b][5][M])
 | Yes |
| 1. Dispute Resolution Procedures (*EC* Section 47605[b][5][N])
 | Yes |
| 1. Closure Procedures (*EC* Section 47605[b][5][O])
 | Yes |
| Standards, Assessments, and Parent Consultation (*EC* sections 47605[c][1] and [2]) | Yes |
| Effect on Authorizer and Financial Projections (*EC* Section 47605[g]) | No |
| Teacher Credentialing (*EC* Section 47605[l]) | Yes |
| Transmission of Audit Report (*EC* Section 47605[m]) | Yes |
| Goals to Address the Eight State Priorities (*EC* Section 47605[b][5][A][ii]) | No |
| Transferability of Secondary Courses (*EC* 47605 [b][5][A][iii]) | NA |

**REQUIREMENTS FOR STATE BOARD OF EDUCATION-AUTHORIZED CHARTER SCHOOLS**

## Sound Educational Practice

*EC* sections 47605(b) and (b)(1)

*California Code of Regulations,* Title 5 (5 *CCR*) sections 11967.5.1(a) and (b)

### Evaluation Criteria

For purposes of *EC* Section 47605(b), a charter petition shall be “consistent with sound educational practice” if, in the SBE’s judgment, it is likely to be of educational benefit to pupils who attend. A charter school need not be designed or intended to meet the educational needs of every student who might possibly seek to enroll in order for the charter to be granted by the SBE.

For purposes of *EC* Section 47605(b)(1), a charter petition shall be “an unsound educational program” if it is either of the following:

1. A program that involves activities that the SBE determines would present the likelihood of physical, educational, or psychological harm to the affected pupils.
2. A program that the SBE determines not likely to be of educational benefit to the pupils who attend.

**The charter petition is “consistent with sound educational practice.”**

### Comments

The RSPE petition is consistent with sound educational practice. RSPE proposes to serve 386 pupils in transitional kindergarten (TK) through grade four during the
2019–2020 school year. The Rocketship program is designed to serve pupils who are or may be at risk of achieving below grade level, targets pupils from predominantly low-income neighborhoods, and has a model that is built on the following three foundational pillars of excellence (Attachment 3, p. 13):

* Teachers and Leaders: Elevating and Celebrating Instruction
* Rocketeer Pupils: Personalized Learning and Growth
* Rocketeer Parents: Leaders in the Home, the School, and the Community

## Ability to Successfully Implement the Intended Program

*EC* Section 47605(b)(2)

5 *CCR* Section 11967.5.1(c)

### Evaluation Criteria

For purposes of *EC* Section 47605(b)(2), the SBE shall take the following factors into consideration in determining whether charter petitioners are "demonstrably unlikely to successfully implement the program":

1. If the petitioners have a past history of involvement in charter schools or other education agencies (public or private), the history is one that the SBE regards as unsuccessful, e.g., the petitioners have been associated with a charter school of which the charter has been revoked or a private school that has ceased operation for reasons within the petitioners’ control.
2. The petitioners are unfamiliar, in the SBE’s judgment, with the content of the petition or the requirements of law that would apply to the proposed charter school.
3. The petitioners have presented an unrealistic financial and operational plan for the proposed charter school (as specified).
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.

**The petitioners are unable to successfully implement the intended program.**

### Comments

The RSPE petitioners are unable to successfully implement the intended program as the petitioner has presented an unrealistic financial and operational plan for the proposed charter school with heavy reliance on intra-company loans.The CDE finds that the RSPE multi-year financial plan is not fiscally viable due to the negative ending fund balances of $283,187 and $47,149 with no reserve for fiscal years (FYs)
2019–2020 and 2020–21, respectively.

#### Budget

The RSPE multi-year projected budget includes the following projected pupil enrollment numbers (Attachment 4):

* A planning year in 2018–2019
* 386 TK/K through grade four pupils in 2019–2020
* 488 TK/K through grade five pupils in 2020–21
* 539 TK/K through grade five pupils in 2021–22
* 567 TK/K through grade five pupils in 2022–23
* 600 TK/K through grade five pupils in 2023–24

#### Cash Flow/Start-up loans

RSPE relies heavily on a Charter School Revolving Loan Fund of $250,000 and an intra-company loan of $750,000 to cover its cash deficits that will threaten the fiscal viability of RSPE. The CDE’s determination regarding fiscal viability and sustainability does not include loans or pending federal start up grants.

In RSPE’s first year of operation, the annual lease payment of $1.1 million is a burden to RSPE’s financial viability. Although the lease expense in FY 2019–2020 is expensed at $1.1 million in the budget, the actual cash outflow for the facility in this year is only $550,000 as RSPE will spread out the expense of $550,000 over the remaining 29 years of the lease payment.

### Past History–Current SBE Authorized Rocketship School

Rocketship San Francisco (RSF) was approved on January 11, 2012, to open during the 2013–14 school year. On June 6, 2013, RSF submitted a material revision to the SBE requesting to delay the opening of the charter school until the fall of 2015. The material revision was withdrawn from RSF. CDE was notified that RSF was unable to open by September 30, 2013. On July 30, 2013, the CDE sent a letter confirming that the RSF charter petition approval had been terminated.

Rocketship Futuro Academy (RFA), #1805, is currently authorized by the SBE. RFA was approved by the SBE on March 10, 2016, for a five year term from July 1, 2016, through June 30, 2021. Since RFA’s authorization, the charter school has undergone a material revision to reduce enrollment numbers and has been issued six letters of concern, as outlined below, by the CDE during the 2017–18 school year. Two letters were for fiscal issues; two letters were for English Language Development (ELD) instruction and teacher credentialing; one letter was for designated and integrated ELD instruction and an English Learner Advisory committee (ELAC); and an additional letter was again for teacher credentialing. Additionally, the most recent letter of concern dated June 13, 2018, highlighted negative ending fund balances and declining enrollment. In response, RFA again is using intra-company loans and deferral of management fees to balance the RFA budget and continuing issues with cash flow.

In the August 2018 Fiscal Memorandum to the SBE, RFA is considered to be in poor financial condition. Charter schools in poor financial condition are in danger of jeopardizing their fiscal operations going forward; have negative fund balances with no reserves; and do not have adequate cash levels, but have high debt levels. RFA’s second interim report indicates that RFA is projecting a negative ending fund balance of $916,509 with a zero percent reserve for FY 2017–18, which is below the recommended five percent in reserves outlined in the Memorandum of Understanding between RFA and the SBE.

On October 4, 2017, RFA was issued a letter of concern regarding a negative ending fund balance and no reserves as well as declining enrollment.

The CDE did not receive a response to the October 4, 2017, letter of concern asking RFA to submit a Fiscal Corrective Action Plan (FCAP) with narrative to ensure pupil enrollment growth.

On November 1, 2017, RFA was issued a letter of concern, following a site visit on March 8, 2017, on RFA’s English Learner (EL) program, regarding ELD instruction and appropriately credentialed teachers.

The CDE did not receive a response to the November 1, 2017, letter of concern.

On February 13, 2018, RFA was issued a follow-up letter of concern regarding ELD instruction and appropriately credentialed teachers.

On March 5, 2018, RFA provided the CDE with a letter and documentation that included: (1) a master schedule of ELD protected time within the instructional day; (2) annual EL placement letters to parents; and (3) EL reclassification letters to parents of EL students. RFA indicates the current curriculum is meeting the 2012 ELD standards.

The CDE has determined that the RFA response was insufficient.

On May 21, 2018, RFA was issued a letter of concern, following a site visit on March 15, 2018, regarding the lack of integrated ELD instruction, designated ELD instruction, Guided Language Acquisition Design and Specifically Designed Academic Instruction, and an ELAC.

On June 5, 2018, RFA provided the CDE with a letter and documentation confirming that the corrective actions from the April 25–26, 2018, annual site visit and ELD concerns in the May 21, 2018, letter had been addressed.

The CDE has determined that the RFA response was sufficient.

On June 5, 2018, RFA was issued a letter of concern regarding the annual site visit conducted on April 25–26, 2018, addressing teacher credentialing.

On June 21, 2018, RFA provided the CDE with a letter and documentation admitting gaps in the credentialing processes and implementing a compliance plan that includes hiring a credential analyst to support staff needs, a tracking system (Salesforce), better communication, supports, and resources.

The CDE has determined that the RFA response was sufficient.

On June 13, 2018, RFA was issued a letter of concern regarding a negative ending fund balance and no reserves as well as declining enrollment.

On July 3, 2018, RFA provided the CDE with a letter confirming:

* RFA is experiencing an annual loss during a period of enrollment growth.
* The current accounting methodology of providing a full accrual report format shows a negative ending net asset balance and RFA will be switching to a modified accrual report format to show a positive net asset balance in the future.
* RFA will be providing a supplementary schedule in the FY 2018 audited consolidated annual report as part of the action plan to address fiscal concerns.
* The projections for the 2019–2020 school year are anticipated to show a positive balance, but that relies upon philanthropy not yet received, and may include deferral of management fees, fundraising, and intra-company loans.

The CDE has determined that the RFA response was insufficient.

## Required Number of Signatures

*EC* Section 47605(b)(3)

5 *CCR* Section 11967.5.1(d)

### Evaluation Criteria

For purposes of *EC* Section 47605(b)(3), a charter petition that “does not contain the number of signatures required by [law]” …, shall be a petition that did not contain the requisite number of signatures at the time of its submission …

**The petition does contain the required number of signatures at the time of its submission.**

### Comments

The RSPE petition does contain the required number of teacher signatures at the time of its submission.

## Affirmation of Specified Conditions

*EC* sections 47605(b)(4) and (d)

5 *CCR* Section 11967.5.1(e)

### Evaluation Criteria

For purposes of *EC* Section 47605(b)(4), a charter petition that "does not contain an affirmation of each of the conditions described in (*EC* Section 47605[d])" …, shall be a petition that fails to include a clear, unequivocal affirmation of each such condition. 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(d).

| Criteria | Criteria Met |
| --- | --- |
| 1. [A] charter school shall be nonsectarian in its programs, admission policies, employment practices, and all other operations, shall not charge tuition, and shall not discriminate against a pupil on the basis of disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained in the definition of hate crimes set forth in Section 422.55 of the California *Penal Code*. Except as provided in paragraph (2), admission to a charter school shall not be determined according to the place of residence of the pupil, or of his or her parent or guardian, within this state, except that any existing public school converting partially or entirely to a charter school under this part shall adopt and maintain a policy giving admission preference to pupils who reside within the former attendance area of that public school.
 | Yes |
| 1. (A) A charter school shall admit all pupils who wish to attend the school.
2. If the number of pupils who wish to attend the charter school exceeds the charter school’s capacity, attendance, except for existing pupils of the charter school, shall be determined by a public random drawing. Preference shall be extended to pupils currently attending the charter school and pupils who reside in the school district except as provided for in Section 47614.5. Preferences, including, but not limited to, siblings of pupils admitted or attending the charter school and children of the charter school’s teachers, staff, and founders identified in the initial charter, may also be permitted by the chartering authority on an individual charter school basis.
3. In the event of a drawing, the chartering authority shall make reasonable efforts to accommodate the growth of the charter school and, in no event, shall take any action to impede the charter school from expanding enrollment to meet pupil demand.
 | Yes |
| 1. If a pupil is expelled or leaves the charter school without graduating or completing the school year for any reason, the charter school shall notify the superintendent of the school district of the pupil’s last known address within 30 days, and shall, upon request, provide that school district with a copy of the cumulative record of the pupil, including a transcript of grades or report card, and health information. This paragraph applies only to pupils subject to compulsory full-time education pursuant to *EC* Section 48200.
 | Yes |

**The petition does contain the required affirmations.**

### Comments

The RSPE petition does contain the required affirmations (Attachment 3, pp. 6–8).

## Exclusive Public School Employer

*EC* Section 47605(b)(6)

5 *CCR* Section 11967.5.1(f)(15)

### Evaluation Criteria

The declaration of whether or not the district shall be deemed the exclusive public school employer of the employees of the charter school for the purposes of the Educational Employment Relations Act (Chapter 10.7 [commencing with Section 3540] of Division 4 of Title 1 of the California *Government Code*), as required by *EC* Section 47605(b)(6), recognizes that the SBE is not an exclusive public school employer and that, therefore, the charter school must be the exclusive public school employer of the employees of the charter school for the purposes of the Educational Employment Relations Act (EERA).

**The petition does include the necessary declaration.**

### Comments

The RSPE petition does include the necessary declaration (Attachment 3, pp. 6 and 138).

**THE 15 CHARTER ELEMENTS**

## 1. Description of Educational Program

*EC* Section 47605(b)(5)(A)

5 *CCR* Section 11967.5.1(f)(1)

### Evaluation Criteria

The description of the educational program …, as required by *EC* Section 47605(b)(5)(A), at a minimum:

| **Criteria** | **Criteria Met** |
| --- | --- |
| 1. Indicates the proposed charter school’s target student population, including, at a minimum, grade levels, approximate numbers of pupils, and specific educational interests, backgrounds, or challenges.
 | Yes |
| 1. Specifies a clear, concise school 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 twenty-first century, belief of how learning best occurs, and goals consistent with enabling pupils to become or remain self-motivated, competent, and lifelong learners.
 | Yes |
| 1. Includes 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.
 | Yes |
| 1. Indicates the basic learning environment or environments (e.g., site-based matriculation, independent study, community-based education, technology-based education).
 | Yes |
| 1. Indicates 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 for the four core curriculum areas adopted by the SBE pursuant to *EC* Section 60605 and to achieve the objectives specified in the charter.
 | Yes |
| 1. Indicates how the charter school will identify and respond to the needs of pupils who are not achieving at or above expected levels.
 | Yes |
| 1. Indicates 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.
 | No |
| 1. Specifies the charter school’s special education plan, including, but not limited to, the means by which the charter school will comply with the provisions of *EC* Section 47641, the process to be used to identify students who 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.
 | Yes |

**The petition does not overall present a reasonably comprehensive description of the educational program.**

### Comments

The RSPE petition does not overall present a reasonably comprehensive description of the educational program. The petition does not include the process by which ELs who are reclassified as fluent English proficient (RFEP) will be monitored for a minimum of four years. Additionally, the petition does not include a reasonably comprehensive description of the RSPE TK program.

If approved by the SBE, as a condition for approval, the RSPE petitioner will be required to revise the petition in order to reflect the SBE as authorizer and include the necessary language for Element 1–Description of Educational Program for RSPE’s plan for ELs.

#### Educational Program

The petition states that RSPE projects to enroll 386 pupils in TK through grade four in its first year of operation in 2019–2020 and increase to 600 pupils in TK through grade five in 2023–24 (Attachment 3, p. 17). The petition states that RSPE’s mission is to eliminate the achievement gap by graduating all pupils at or above grade level and presents the following goals (Attachment 3, p. 12):

* RSPE pupils will graduate from RSPE at or above grade level.
* RSPE pupils will become self-motivated, competent, and lifelong learners.
* RSPE pupils will develop a deep love of learning.
* RSPE will provide parents with a path for their children to take in order to have the best chance to attend a four-year college.
* RSPE will encourage alumni both to become leaders in their community and help others achieve their goals.

#### Plan for Low-Achieving Pupils

The petition states that RSPE will utilize a multiple gating process in its approach to universal screening, which refers to the process of using the results from a variety of screening tools in order to ensure all pupils who are struggling academically or behaviorally are identified in a timely manner. RSPE’s first screen is the Strategic Teaching and Evaluation of Progress assessment and pupils who fall below a certain cut point on each of these assessments are further screened using a Curriculum-Based Measurement in order to pinpoint the specific area of academic deficit (Attachment 3, p. 43). RSPE will use the following strategies to support low-achieving pupils (Attachment 3, pp. 43–44):

* Multiple tiers of support
* Evidence-based interventions
* Ongoing progress monitoring
* Data-based decision making
* Treatment integrity
* Problem-solving

#### Plan for High-Achieving Pupils

The petition states that RSPE will use internal assessments in English language arts (ELA)/literacy and mathematics to identify high-performing pupils within the first four to six weeks and monthly thereafter. The RSPE petition states that high-achieving pupils are those who score at least one grade level above on standardized tests or internal metrics. RSPE will use the following strategies to support high-achieving pupils (Attachment 3, pp. 46–47):

* Differentiation
* Family communication
* Teacher collaboration
* Focused instruction
* Daily enrichment
* Ongoing assessment

#### Plan for English Learners

The petition does not include the process, pursuant to the Every Student Succeeds Act, by which ELs who are RFEP, will be monitored for a minimum of four years to ensure correct classification, placement, and additional academic support, as needed (20 United States Code [U.S.C.], Section 6841[a][4][5] and 5 *CCR*, Section 11304). The petition states that RSPE will monitor reclassified pupils’ performance for two years after reclassification (Attachment 3, p. 62). The plan for ELs includes the following sections (Attachment 3, pp. 59–65):

* Identification and assessment
* Classification of initial fluent English proficient
* Reclassification as RFEP
* English language instruction
	+ ELD standards
	+ Integrated and designated instruction
	+ Scaffolding
	+ Instructional strategies
* Parent communication and participation

The petition does not include a reasonably comprehensive description of the RSPE TK program.

#### Plan for Special Education

The petition states that RSPE will comply with all applicable state and federal laws in serving pupils with disabilities, including, but not limited to, the Individuals with Disabilities Education Improvement Act of 2004 (IDEIA), Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, and any other civil rights enforced by the United States Department of Education Office for Civil Rights (OCR). The petition identifies a plan for pupils with disabilities, including identification, assessment referrals, implementation of the Individualized Education Program, reporting, and due process (Attachment 3, pp. 47–59).

## 2. Measurable Pupil Outcomes

*EC* Section 47605(b)(5)(B)

5 *CCR* Section 11967.5.1(f)(2)

### Evaluation Criteria

Measurable pupil outcomes, as required by *EC* Section 47605(b)(5)(B), at a minimum:

| Criteria | Criteria Met |
| --- | --- |
| 1. Specify 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. 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. 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.
 | No |
| 1. Include the school’s API growth target, if applicable.
 | Not Applicable |

**The petition does not present a reasonably comprehensive description of measurable pupil outcomes.**

### Comments

The RSPE petition does not present a reasonably comprehensive description of measurable pupil outcomes (MPOs). The petition does not include a description of the MPOs for each subgroup of pupils. The RSPE petition includes a table that outlines the goals, actions, MPOs, methods of assessment, and person(s) responsible for each of the eight state priorities (Attachment 3, pp. 69–102).

If approved by the SBE, as a condition for approval, the RSPE petitioner will be required to revise the petition in order to reflect the SBE as authorizer and include the necessary language for Element 2–Measurable Pupil Outcomes.

## 3. Method for Measuring Pupil Progress

*EC* Section 47605(b)(5)(C)

5 *CCR* Section 11967.5.1(f)(3)

### Evaluation Criteria

The method for measuring pupil progress, as required by *EC* Section 47605(b)(5)(C), at a minimum:

| **Criteria** | **Criteria Met** |
| --- | --- |
| 1. Utilizes 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.
 | Yes |
| 1. Includes the annual assessment results from the Standardized Testing and Reporting (STAR) program.
 | Not Applicable |
| 1. Outlines a 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.
 | Yes |

**The petition does present a reasonably comprehensive description of the method for measuring pupil progress.**

### Comments

The petition states that RSPE’s assessment plan includes multiple measures designed to monitor pupil progress over time which includes baseline, formative, interim, and summative assessments. The petition further lists RSPE’s current assessments. The petition states that RSPE will utilize Schoolzilla to track and maintain pupil data and that teachers will engage in an ongoing process of data review and evaluation in connection to pupil learning and outcomes, which will also be used to judge the effectiveness of curriculum units and teaching. RSPE plans to have regular parent/teacher conference periods and progress reports each year (Attachment 3, pp. 102–104).

## 4. Governance Structure

*EC* Section 47605(b)(5)(D)

5 *CCR* Section 11967.5.1(f)(4)

### Evaluation Criteria

The governance structure of the charter school, including, but not limited to, the process … to ensure parental involvement …, as required by *EC* Section 47605(b)(5)(D), at a minimum:

| Criteria | Criteria Met |
| --- | --- |
| 1. Includes evidence of the charter school’s incorporation as a non-profit public benefit corporation, if applicable.
 | Yes |
| 1. Includes evidence that the organizational and technical designs of the governance structure reflect a seriousness of purpose necessary to ensure that:
	1. The charter school will become and remain a viable enterprise.
	2. There will be active and effective representation of interested parties, including, but not limited to parents (guardians).
	3. The educational program will be successful.
 | Yes |

**The petition does present a reasonably comprehensive description of the school’s governance structure.**

### Comments

The petition states that RSPE will be operated by Rocketship Education, Inc. (RSED), a California non-profit public benefit corporation with 501(c)(3) status. RSED will be governed by a Board of Directors pursuant to its corporate bylaws, which shall be consistent with the charter petition. The petition states that the RSED Board is ultimately responsible for the operation and activities of RSPE and has the responsibility to solicit input from, and opinions of, both school staff and pupils’ parents regarding issues of significance and to weigh the input and opinions carefully before taking action. RSED Bylaws state that the Board must consist of at least 3 and up to 25 members and they must serve for staggered terms of two years. The petition states that RSED has held most of its Board meetings in San Jose, where 10 out of the 12 RSED-operated charter schools in operation are located; however, they will consider holding at least one Board meeting per year in a location that is easily accessible to WCCUSD families. The petition states that RSED will have a regional advisory board consisting of a diverse group of parents, teachers, and civic and business leaders and that RSPE will ensure that WCCUSD is adequately represented on the advisory board. The petition also states that RSPE will form a school site council (SSC) in accordance with *EC* Section 52852 and an ELAC pursuant to *EC* Section 52176(b) (Attachment 3, pp. 109–111).

## 5. Employee Qualifications

*EC* Section 47605(b)(5)(E)

5 *CCR* Section 11967.5.1(f)(5)

### Evaluation Criteria

The qualifications (of the school’s employees), as required by *EC* Section 47605(b)(5)(E), at a minimum:

| Criteria | Criteria Met |
| --- | --- |
| 1. Identify general qualifications for the various categories of employees the school anticipates (e.g., administrative, instructional, instructional support, non-instructional support). The qualifications shall be sufficient to ensure the health and safety of the school’s faculty, staff, and pupils.
 | No |
| 1. 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.
 | Yes |
| 1. Specify that all requirements for employment set forth in applicable provisions of law will be met, including, but not limited to, credentials as necessary.
 | No |

**The petition does not present a reasonably comprehensive description of employee qualifications.**

### Comments

The RSPE petition does not present a reasonably comprehensive description of employee qualifications. The petition states the employment of various staff throughout the petition; however, it does not provide reasonably comprehensive descriptions of the following (Attachment 3, pp. 56–58):

* Psychologist
* Speech therapist
* Speech and language pathologist assistants
* Occupational therapist

If approved by the SBE, as a condition for approval, the RSPE petitioner will be required to revise the petition in order to reflect the SBE as authorizer and include the necessary language for Element 5–Employee Qualifications.

## 6. Health and Safety Procedures

*EC* Section 47605(b)(5)(F)

5 *CCR* Section 11967.5.1(f)(6)

### Evaluation Criteria

The procedures …, to ensure the health and safety of pupils and staff, as required by *EC* Section 47605(b)(5)(F), at a minimum:

| Criteria | Criteria Met |
| --- | --- |
| 1. Require that each employee of the school furnish the school with a criminal record summary as described in *EC* Section 44237 and comply with *EC* Section 44830.1.
 | Yes |
| 1. Include the examination of faculty and staff for tuberculosis as described in *EC* Section 49406.
 | No |
| 1. Require immunization of pupils as a condition of school attendance to the same extent as would apply if the pupils attended a non-charter public school.
 | Yes |
| 1. Provide for the screening of pupils’ vision and hearing and the screening of pupils for scoliosis to the same extent as would be required if the pupils attended a non-charter public school.
 | Yes |

**The petition does not present a reasonably comprehensive description of health and safety procedures.**

### Comments

The RSPE petition does not present a reasonably comprehensive description of health and safety procedures. The petition states that RSPE will follow the requirement of *EC* Section 49406 in requiring tuberculosis (TB) testing of all employees (Attachment 3,
p. 121); however, the petition does not include the process by which volunteers shall be required to submit a TB risk assessment pursuant to *EC* Section 49406(m).

If approved by the SBE, as a condition for approval, the RSPE petitioner will be required to revise the petition in order to reflect the SBE as authorizer and include the necessary language for Element 6–Health and Safety Procedures.

## 7. Racial and Ethnic Balance

*EC* Section 47605(b)(5)(G)

5 *CCR* Section 11967.5.1(f)(7)

### Evaluation Criteria

Recognizing the limitations on admissions to charter schools imposed by *EC* Section 47605(d), the means by which the school(s) will achieve a racial and ethnic balance among its pupils that is reflective of the general population residing within the territorial jurisdiction of the school district …, as required by *EC* Section 47605(b)(5)(G), shall be presumed to have been met, absent specific information to the contrary.

**The petition does present a reasonably comprehensive description of means for achieving racial and ethnic balance.**

### Comments

The petition states that RSPE shall strive to achieve a racial and ethnic balance among its pupils that is reflective of the general population residing within the territorial jurisdiction of the WCCUSD (Attachment 3, pp. 128–129).

## 8. Admission Requirements, If Applicable

*EC* Section 47605(b)(5)(H)

5 *CCR* Section 11967.5.1(f)(8)

### Evaluation Criteria

To the extent admission requirements are included in keeping with *EC* Section 47605(b)(5)(H), the requirements shall be in compliance with the requirements of *EC* Section 47605(d)(2)(B) and any other applicable provision of law.

**The petition does present a reasonably comprehensive description of admission requirements.**

### Comments

The RSPE petition does present a reasonably comprehensive description of admission requirements. The petition states that RSPE shall admit all pupils who wish to attend and that in the event that applications for enrollment exceed capacity, preferences in the case of a public random drawing shall be allowed in the following order (Attachment 3, pp. 130–131):

* Siblings of currently enrolled RSPE pupils
* Children of employees of RSPE (not to exceed 10 percent of total enrollment)
* Residents of WCCUSD
* Other California residents

The CDE notes that with the amendments to *EC* Section 47605(d)(2)(B), outlined in Assembly Bill (AB) 1360 and signed into law on October 13, 2017, the SBE has the discretion to approve the proposed preferences stated in the RSPE petition at a public hearing.

## 9. Annual Independent Financial Audits

*EC* Section 47605(b)(5)(I)

5 *CCR* Section 11967.5.1(f)(9)

### Evaluation Criteria

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 SBE’s satisfaction, as required by *EC* Section 47605(b)(5)(I), at a minimum:

| Criteria | Criteria Met |
| --- | --- |
| 1. Specify who is responsible for contracting and overseeing the independent audit.
 | Yes |
| 1. Specify that the auditor will have experience in education finance.
 | Yes |
| 1. Outline the process of providing audit reports to the SBE, CDE, or other agency as the SBE may direct, and specifying the timeline in which audit exceptions will typically be addressed.
 | Yes |
| 1. Indicate the process that the charter school(s) will follow to address any audit findings and/or resolve any audit exceptions.
 | Yes |

**The petition does present a reasonably comprehensive description of annual independent financial audits.**

### Comments

The RSPE petition does present a reasonably comprehensive description of annual independent financial audits. The petition states the RSED Board will appoint an audit committee, which will select an independent financial auditor and oversee audit requirements. The auditor will have, at a minimum, a certified public accountant, have educational institution audit experience, and will be approved by the State Controller. The petition states that the annual audit will be completed and forwarded to the State Controller and to the CDE by December 15 of each year. The audit committee will review any audit exceptions or deficiencies and report to the business committee of the RESD Board with recommendations on how to resolve them. The RESD business committee will approve the audit and submit a report to the CDE describing how the exceptions and deficiencies have been or will be resolved along with an anticipated timeline for the same by March 15 (Attachment 3, p. 132).

## 10. Suspension and Expulsion Procedures

*EC* Section 47605(b)(5)(J)

5 *CCR* Section 11967.5.1(f)(10)

### Evaluation Criteria

The procedures by which pupils can be suspended or expelled, as required by *EC* Section 47605(b)(5)(J), at a minimum:

| Criteria | Criteria Met |
| --- | --- |
| 1. 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 petitioners’ reviewed the offenses for which students must or may be suspended or expelled in non-charter public schools.
 | No |
| 1. Identify the procedures by which pupils can be suspended or expelled.
 | Yes |
| 1. 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 regard to suspension or expulsion.
 | No |
| 1. Provide evidence that in preparing the lists of offenses specified in subparagraph (A) and the procedures specified in subparagraphs (B) and (C), the petitioners reviewed the lists of offenses and procedures that apply to students attending non-charter public schools, and provide evidence that the charter petitioners believe their proposed lists of offenses and procedures provide adequate safety for students, staff, and visitors to the school and serve the best interests of the school’s pupils and their parents (guardians).
 | Yes |
| 1. If not otherwise covered under subparagraphs (A), (B), (C), and (D):
2. Provide for due process for all pupils and demonstrate an understanding of the rights of pupils with disabilities in regard to suspension and expulsion.
3. Outline how detailed policies and procedures regarding suspension and expulsion will be developed and periodically reviewed, including, but not limited to, periodic review and (as necessary) modification of the lists of offenses for which students are subject to suspension or expulsion.
 | No |

**The petition does not present a reasonably comprehensive description of suspension and expulsion procedures.**

### Comments

The RSPE petition does not present a reasonably comprehensive description of suspension and expulsion procedures.

The petition does not adequately address recent amendments to *EC* Section 47605(b)(5)(J) with regard to a due process hearing adjudicated by a neutral officer within a reasonable number of days. For suspensions of less than 10 days, the petition fails to provide for an opportunity for the pupil to present his or her side if the pupil denies the charges pursuant to *EC* Section 47605(b)(5)(J)(i). For suspensions of more than 10 days, pupils are entitled to a hearing before a neutral officer pursuant to *EC* Section 47605(b)(5)(J)(ii). The petition also fails to include a clear statement that no pupil shall be involuntarily removed by RSPE for any reason unless the parent or guardian of the pupil has been provided written notice of the intent to remove the pupil no less than five school days before the effective date of the action, as required by *EC* Section 47605(b)(5)(J)(iii).

Addressing evaluation criteria A, B, and D, the petition lists discretionary and non-discretionary offenses and procedures for suspension and expulsion (Attachment 3, pp. 133–135).

Addressing evaluation criteria E, the RSPE petition is not compliant with Federal law regarding interim alternative educational placement. The petition states that when an appeal relating to the placement of the pupil or the manifestation determination has been requested by either the parent or RSPE, the pupil shall remain in the interim alternative educational setting pending the decision of the hearing officer or until the expiration of the 45-day time period provided for in an interim alternative educational setting, whichever occurs first, unless the parent and RSPE agree otherwise (Attachment 3, pp. 133–135). 20 U.S.C. Section 1415(k)(3)(B)(ii)(II) allows a hearing officer to order a change in placement of a pupil with a disability to an appropriate interim alternative setting for not more than 45 days if the hearing office determines that maintaining the current placement of such pupils is substantially likely to result in injury to the pupil or to others. RSPE’s policy, which allows placing pupils in an interim alternative setting for a 45-day period prior to a determination by a hearing officer that the current placement of such pupils will result in injury to the pupil or others violates 20 U.S.C. Section 1415(k)(3)(B)(ii)(II). This would deny a pupil’s due process right to be heard prior to placing the pupil in an alternative education setting for 45 days. It should further be noted that under 20 U.S.C. Section 1415(k)(4)(B), the State or local educational agency (LEA) shall arrange for an expedited hearing, which shall occur within 20 school days of the date of the hearing. This would allow for a maximum placement in an interim alternative educational setting pending a decision for no more than 30 school days.

If approved by the SBE, as a condition for approval, the RSPE petitioner will be required to revise the petition in order to reflect the SBE as authorizer and include the necessary language for Element 10–Suspension and Expulsion Procedures.

## 11. Teachers’ and Public Employees’ Retirement System, and Social Security Coverage

**California State Teachers’ Retirement System, California Public Employees’ Retirement System, and Social Security Coverage**

*EC* Section 47605(b)(5)(K)

5 *CCR* Section 11967.5.1(f)(11)

### Evaluation Criteria

The manner by which staff members of the charter schools will be covered by California State Teachers’ Retirement System (CalSTRS), California Public Employees’ Retirement System (CalPERS), or federal social security, as required by *EC* Section 47605(b)(5)(K), at a minimum, specifies the positions to be covered under each system and the staff who will be responsible for ensuring that appropriate arrangements for that coverage have been made.

**The petition does present a reasonably comprehensive description of CalSTRS, CalPERS, and social security coverage.**

### Comments

The RSPE petition does present a reasonably comprehensive description of CalSTRS, CalPERS, and social security coverage. The petition states that all full-time employees (FTE) will be offered a 403(b) program, full-time certificated teachers may also participate in CalSTRS, and all part-time employees and FTE non-certificated employees will participate in the federal social security system. RSPE’s human resources team, in conjunction with the principal, ensures that appropriate arrangements for coverage have been made (Attachment 3, p. 141).

## 12. Public School Attendance Alternatives

*EC* Section 47605(b)(5)(L)

5 *CCR* Section 11967.5.1(f)(12)

### Evaluation Criteria

The public school attendance alternatives for pupils residing within the school district who choose not to attend charter schools, as required by *EC* Section 47605(b)(5)(L), at a minimum, specify that the parent or guardian of each pupil enrolled in the charter school shall be informed that the pupil has no right to admission in a particular school of any local educational agency (LEA) (or program of any LEA) as a consequence of enrollment in the charter school, except to the extent that such a right is extended by the LEA.

**The petition does present a reasonably comprehensive description of public school attendance alternatives.**

### Comments

The RSPE petition does present a reasonably comprehensive description of public school attendance alternatives (Attachment 3, p. 142).

## 13. Post-employment Rights of Employees

*EC* Section 47605(b)(5)(M)

5 *CCR* Section 11967.5.1(f)(13)

### Evaluation Criteria

The description of the rights of any employees of the school district upon leaving the employment of the school district to work in a charter school, and of any rights of return to the school district after employment at a charter school, as required by *EC* Section 47605(b)(5)(M), at a minimum, specifies that an employee of the charter school shall have the following rights:

| Criteria | Criteria Met |
| --- | --- |
| 1. Any rights upon leaving the employment of an LEA to work in the charter school that the LEA may specify.
 | Yes |
| 1. Any rights of return to employment in an LEA after employment in the charter school as the LEA may specify.
 | Yes |
| 1. Any other rights upon leaving employment to work in the charter school and any rights to return to a previous employer after working in the charter school that the SBE determines to be reasonable and not in conflict with any provisions of law that apply to the charter school or to the employer from which the employee comes to the charter school or to which the employee returns from the charter school.
 | Yes |

**The petition does present a reasonably comprehensive description of post-employment rights of employees.**

### Comments

The RSPE petition does present a reasonably comprehensive description of post-employment right of employees (Attachment 3, p. 143).

## 14. Dispute Resolution Procedures

*EC* Section 47605(b)(5)(N)

5 *CCR* Section 11967.5.1(f)(14)

### Evaluation Criteria

The procedures to be followed by the charter school and the entity granting the charter to resolve disputes relating to the provisions of the charter, as required by *EC* Section 47605(b)(5)(N), at a minimum:

| Criteria | Criteria Met |
| --- | --- |
| 1. Include any specific provisions relating to dispute resolution that the SBE determines necessary and appropriate in recognition of the fact that the SBE is not a LEA.
 | Yes |
| 1. Describe how the costs of the dispute resolution process, if needed, would be funded.
 | Yes |
| 1. Recognize that, because it is not a LEA, the SBE may choose to resolve a dispute directly instead of pursuing the dispute resolution process specified in the charter, provided that if the SBE intends to resolve a dispute directly instead of pursuing the dispute resolution process specified in the charter, it must first hold a public hearing to consider arguments for and against the direct resolution of the dispute instead of pursuing the dispute resolution process specified in the charter.
 | Yes |
| 1. Recognize that if the substance of a dispute is a matter that could result in the taking of appropriate action, including, but not limited to, revocation of the charter in accordance with *EC* Section 47604.5, the matter will be addressed at the SBE’s discretion in accordance with that provision of law and any regulations pertaining thereto.
 | Yes |

**The petition does present a reasonably comprehensive description of dispute resolution procedures.**

### Comments

The RSPE petition does present a reasonably comprehensive description of dispute resolution procedures. The petition states that RSPE recognizes the following (Attachment 3, pp. 144–145):

* That the SBE cannot be pre-bound to a contractual obligation to split the costs of mediation or agree to mediation to resolve disputes.
* That, because it is not an LEA, the SBE may choose to resolve a dispute directly instead of pursuing the dispute resolution process specified in the charter, provided that, if the SBE intends to resolve a dispute directly instead of pursuing the dispute resolution process specified in the charter, it must first hold a public hearing to consider arguments for and against the direct resolution of the dispute instead of pursuing the dispute resolution process specified in the charter.
* That if the substance of a dispute is a matter that could result in the taking of appropriate action, including, but not limited to, revocation of the charter in accordance with *EC* Section 47604.5, the matter will be addressed at the SBE’s discretion in accordance with that provision of law and any regulations pertaining thereto.

## 15. Closure Procedures

*EC* Section 47605(b)(5)(O)

5 *CCR* Section 11967.5.1(f)(15)

### Evaluation Criteria

A description of the procedures to be used if the charter school closes, in keeping with *EC* Section 47605(b)(5)(O). The procedures shall ensure a final audit of the charter school to determine the disposition of all assets and liabilities of the charter school, including plans for disposing of any net assets and for the maintenance and transfer of pupil records.

**The petition does include a reasonably comprehensive description of closure procedures.**

### Comments

The RSPE petition does include a reasonably comprehensive description of closure procedures. The petition states that closure of RSPE will be documented by official action of the Board of Directors and the action will identify the reason as well as an entity and person or persons responsible for closure-related activities (Attachment 3,
p. 145).

**ADDITIONAL REQUIREMENTS UNDER *EDUCATION CODE* SECTION 47605**

## Standards, Assessments, and Parent Consultation

*EC* sections 47605(c)(1) and (2)

5 *CCR* Section 11967.5.1(f)(3)

### Evaluation Criteria

Evidence is provided that:

| Criteria | Criteria Met |
| --- | --- |
| 1. The school shall meet all statewide standards and conduct the pupil assessments required pursuant to *EC* sections 60605, 60851, and any other statewide standards authorized in statute or pupil assessments applicable to pupils in non-charter public schools.
 | Yes |
| 1. The school shall, on a regular basis, consult with their parents and teachers regarding the school’s educational programs.
 | Yes |

**The petition does provide evidence addressing the requirements regarding standards, assessments, and parent consultation.**

### Comments

The RSPE petition does provide evidence addressing the requirement regarding standards, assessments, and parent consultation. The petition states that RSPE shall meet all statewide standards and conduct the pupil assessments required, pursuant to *EC* sections 60605 and 60851, and any other statewide standards authorized in statute, or pupil assessments applicable to pupils in non-charter public schools (Attachment 3, pp. 6 and 102–104).

The petition states RSPE will provide numerous opportunities for parents to get involved in the operations and governance of the school. Parents can become members of the advisory board or be involved with the SSC or ELAC (Attachment 3, p. 109).

## Effect on Authorizer and Financial Projections

*EC* Section 47605(g)

5 *CCR* Section 11967.5.1(c)(3)(A–C)

### Evaluation Criteria

…[T]he petitioners [shall] provide information regarding the proposed operation and potential effects of the school, including, but not limited to:

| Criteria | Criteria Met |
| --- | --- |
| * The facilities to be utilized by the school. The description of the facilities to be used by the charter school shall specify where the school intends to locate.
 | No |
| * The manner in which administrative services of the school are to be provided.
 | Yes |
| * Potential civil liability effects, if any, upon the school and the SBE.
 | Yes |
| * The petitioners have provided 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.
 | No |

**The petition does not provide the required information and financial projections.**

### Comments

The RSPE petition does not provide the required information and financial projections. The petition states that RSPE anticipates locating in close proximity to community colleges and public transportation central to serve the families of the Iron Triangle in San Pablo and Central Richmond; however, the petition does not provide a description of the facilities to be used by RSPE (Attachment 3, p. 150). In addition, the petitioner provided financial statements; however, the CDE concluded that the RSPE multi-year financial plan is not fiscally viable due to the negative ending fund balances (Attachment 4).

If approved by the SBE, as a condition for approval, the RSPE petitioner will be required to revise the petition in order to reflect the SBE as authorizer and include the necessary language for Effect on Authorizer and Financial Projections.

## Teacher Credentialing

*EC* Section 47605(l)

5 *CCR* Section 11967.5.1(f)(5)

### Evaluation Criteria

Teachers in charter schools shall be required to hold a California Commission on Teacher Credentialing certificate, permit, or other document equivalent to that which a teacher in other public schools would be required to hold …It is the intent of the Legislature that charter schools be given flexibility with regard to noncore, non-college preparatory courses.

**The petition does meet this requirement.**

### Comments

The RSPE petition meets this requirement. The petition states that RSPE shall ensure that RSPE teachers hold a Commission on Teacher Credentialing certificate, permit, or other document equivalent to that which a teacher in other public schools is required to hold. As allowed by statute, flexibility will be given to non-core, non-college preparatory teachers (Attachment 3, pp. 7 and 113).

## Transmission of Audit Report

*EC* Section 47605(m)

5 *CCR* Section 11967.5.1(f)(9)

### Evaluation Criteria

A charter school shall transmit a copy of its annual independent financial audit report for the preceding fiscal year … to the chartering entity, the Controller, the county superintendent of schools of the county in which the charter is sited …, and the CDE by December 15 of each year.

**The petition does address this requirement.**

### Comments

The RSPE petition does address this requirement. The petition states that the annual audit will be completed and forwarded to the District, the County Superintendent of Schools, the State Controller, and to the CDE by December 15 of each year (Attachment 3, p. 132).

## Goals to Address the Eight State Priorities

*EC* Section 47605(b)(5)(A)(ii)

### Evaluation Criteria

A charter school shall provide a description of annual goals for all pupils and for each subgroup of pupils identified pursuant to Section 52052, to be achieved in the state priorities, as described in subdivision (d) of Section 52060, that apply for the grade levels served, or the nature of the program operated, by the charter school, and specific annual actions to achieve those goals. A charter petition may identify additional school priorities, the goals for the school priorities, and the specific annual actions to achieve those goals.

**The petition does not address this requirement.**

### Comments

The RSPE petition does not address this requirement. The petition does not include a description of the MPOs for each subgroup of pupils. The RSPE petition includes a table that outlines the goals, actions, MPOs, methods of assessment, and person(s) responsible for each of the eight state priorities (Attachment 3, pp. 69–102).

If approved by the SBE, as a condition for approval, the RSPE petitioner will be required to revise the petition in order to reflect the SBE as authorizer and include the necessary language for Goals to Address the Eight State Priorities.

## Transferability of Secondary Courses

*EC* Section 47605(b)(5)(A)(iii)

### Evaluation Criteria

If the proposed school will serve high school pupils, a description of the manner in which the charter school will inform parents about the transferability of courses 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” to “G” admissions criteria may be considered to meet college entrance requirements.

**This requirement is not applicable.**

### Comments

RSPE will not be serving secondary pupils.