California Department of Education

Charter Schools Division

Revised 1/2020

oab-csd-jul20item07

Attachment 1

# CHARTER SCHOOL PETITION REVIEW FORM: Pinecrest Expedition Academy

CALIFORNIA DEPARTMENT OF EDUCATION

## Key Information Regarding Pinecrest Expedition Academy

### Proposed Grade Span and Build-Out Plan

#### Table 1: 2020–25 Proposed Enrollment

TK–transitional kindergarten/K–kindergarten

NA–Not Applicable. Grade levels not served.

| Grade | 2020–21\* | 2021–22\* | 2022–23 | 2023–24 | 2024–25\* |
| --- | --- | --- | --- | --- | --- |
| TK/K | 7 | 6 | 7 | 7 | 7 |
| 1 | 6 | 7 | 7 | 7 | 7 |
| 2 | 7 | 7 | 8 | 8 | 8 |
| 3 | 5 | 6 | 8 | 8 | 7 |
| 4 | 5 | 6 | 7 | 7 | 7 |
| 5 | 5 | 5 | 7 | 7 | 7 |
| 6 | 5 | 5 | 7 | 7 | 7 |
| 7 | 5 | 5 | 7 | 7 | 7 |
| 8 | 2 | 5 | 7 | 7 | 7 |
| 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 | 52 | 57 | 65 | 65 | 65 |

\*The California Department of Education (CDE) notes that the Pinecrest Expedition Academy (PEA) enrollment numbers for years 2020–21, 2021–22, and 2024–25 do not add up to the total row.

### Proposed Location

PEA intends to lease a facility located at 30433 Old Strawberry Road, which is within the boundaries of Twain Harte School District (THSD). The facility is owned by the Pinecrest Permittees Association and is the former site of Pinecrest Elementary, which closed in 2012. The petitioner included a Letter of Intent outlining the provisions of the contract (Attachment 9, p. 8).

### Brief History

On September 30, 2019, the petitioner submitted the PEA petition to THSD. On November 20, 2019, THSD voted to deny the PEA petition by a vote of five to zero. On November 27, 2019, the petitioner submitted the PEA petition to the Tuolumne County Superintendent of Schools. On February 3, 2020, the Tuolumne County Board of Education voted to deny the PEA petition by a vote of six to zero with one abstention.

The petitioner submitted the PEA petition to the State Board of Education (SBE) on February 20, 2020.

### Lead Petitioner

Heidi Lupo, Lead Petitioner

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

| **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]) | No |
| 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]) | Yes |
| 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]) | No |
| 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]) | Yes |
| 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 not “consistent with sound educational practice.”**

#### Summary

PEA intends to open in the 2020–21 school year with 52 pupils in TK/K through grade eight and serve a total of 65 pupils in TK/K through grade eight by 2024–25 with a mission and vision to inspire a diverse group of learners to achieve academic excellence while developing a strong sense of character and community (Attachment 3, p. 10). The goal of PEA is to preserve natural curiosity and a love of learning while preparing pupils for high-level success, and integrating an outdoor classroom and an immersion into the natural elements for each pupil.

#### Comments

The petitioner intends to offer two multi-grade classrooms for 52 pupils expanding across TK/K through grade eight; however, the PEA petition does not describe how instruction will take place with the anticipated gaps in learning, age, and instructional approaches based upon the target student population. Additionally, the PEA petition describes a home study program (HSP) as a choice for families, but does not give a comprehensive description of the HSP pupil enrollment numbers, instructional model, or how all pupils will be adequately served.

### 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 not able to successfully implement the intended program.**

#### Comments

##### California State Budget Impact

The COVID-19 pandemic has had a tremendous impact on the state budget and the funding that will be provided to local educational agencies (LEAs) in the 2020–21 school year and future school years. The pandemic has led to a large variation between the Governor’s proposed January budget and the proposed May revision, which was discussed at the ACCS meeting on June 9, 2020. On June 23, the Governor; Senate President pro tempore, Toni Atkins; and Speaker of the Assembly, Anthony Rendon announced an agreement on the budget. This agreement has not yet been finalized at the time of the posting of the July SBE meeting agenda, but it is anticipated it will be finalized by the July SBE meeting.

The proposed agreement includes $11 billion of Local Control Funding Formula (LCFF) apportionment deferrals in 2020–21, which will allow LCFF to remain at the 2019–20 level and does not include the 10 percent cut to LCFF proposed at May revision. With deferrals, charter schools and other LEAs will have the burden of fronting cash, maintaining cash flow in the months where monthly apportionments will be deferred, and potential borrowing costs. Deferrals could be especially problematic for new charter schools or existing charter schools that lack the ability to draw down reserves to access cash.

##### Fiscal Analysis

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

* 52 TK/K through grade eight in 2020–21
* 57 TK/K through grade eight in 2021–22
* 65 TK/K through grade eight in 2022–23
* 65 TK/K through grade eight in 2023–24
* 65 TK/K through grade eight in 2024–25

##### Revenue

The PEA multi-year projected budget, as submitted on February 20, 2020, was calculated using an older version of the Fiscal Crisis and Management Assistance Team (FCMAT) LCFF calculator. Therefore, the CDE used the January 14, 2020, FCMAT LCFF calculator to recalculate the PEA LCFF revenue. The CDE finds that PEA has overstated the LCFF revenue by $112,305; $109,466; and $107,310 for fiscal year (FY) 2020–21 through 2022–23, respectively. The CDE adjusted the LCFF revenue for FY 2020–21 and 2022–23 in the budget analysis accordingly.

The PEA multi-year projected budget includes lottery funds for FY 2020–21 through 2022–23. The lottery funds are based on prior year Second Principal Apportionment enrollment, which is overstated by $10,183 and $409 for FY 2020–21 and 2022–23, respectively, and understated by $9,504 for FY 2021–22. The CDE adjusted the lottery funds for FY 2020–21 through 2022–23 in the budget analysis accordingly.

##### Expenditures

The PEA multi-year projected budget does not include expenditures for substitute teachers for FY 2020–21 through 2022–23. The CDE estimated expenditures for substitute teachers to be 1 percent of the LCFF. Per the CDE’s estimates, the expenditures appear to be understated by $4,827; $5,427; and $6,364 for FY 2020–21 through 2022–23, respectively. The CDE adjusted the expenditures for FY 2020–21 through 2022–23 in the budget analysis accordingly.

The PEA petition states that certificated employees at PEA shall participate in the California Teachers’ Retirement System, and that non-certificated full-time staff shall participate in the California Public Employees’ Retirement System (CalPERS) and federal social security. However, the petitioner does not project expenditures in CalPERS in the budget or assumptions.

As noted in the budget narrative and cash flow statement submitted by the petitioner, PEA did not project startup funds. In order to maintain cash flow, PEA intends to apply $250,000 of the Charter School Revolving Loan Fund in FY 2020–21.

The CDE concludes that the PEA projected budget is not viable with the projected enrollment of 52, 57, and 65 and negative ending fund balances of $116,765; $160,625; and $167,057 with no reserves for FY 2020–21 through 2022–23, respectively.

### 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 PEA petition does contain the required number of parent signatures at the time of its submission (Attachment 9, pp. 10–18).

### 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 PEA petition does contain the required affirmations (Attachment 3, pp. 4–6).

### 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 PEA petition does include the necessary declaration (Attachment 3, p. 4).

## 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. | No |
| 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 PEA petition does not present a reasonably comprehensive description of the educational program. The CDE notes that the PEA petition does not provide sufficient information to describe the multi-grade instructional program nor a comprehensive description of the English learner (EL) program. According to the PEA petition, the school intends to open in August 2020 (Attachment 3, p. 101). However, the PEA petition does not provide a clear and specific description of how instruction will take place in two classrooms in a multi-grade setting nor give a comprehensive description of the HSP instruction model as an alternative for families.

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

##### Educational Program

The PEA petition states that it will provide a public education alternative for pupils that is rooted in expeditions and outdoor learning with a strong emphasis on the area’s natural elements and resources.

PEA plans to offer a site-based and independent study program with a targeted population of all pupils in TK/K through grade eight who will benefit from an integrated academic program that allows academic achievement and character growth to thrive, along with a love of learning and a strong sense of community.

Multi-grade: PEA intends to serve pupils in a multi-grade classroom setting. This approach will allow the teacher to facilitate learning groups based on like abilities and aid in facilitating a positive learning environment (Attachment 3, p. 18). The PEA petition outlines the curriculum to be used in core content areas, and emphasizes a personal learning model for each student and each grade level.

Independent study or HSP: The PEA petition states that its educational program will include the enrollment of interested TK/K through grade eight pupils into an independent study program (Attachment 3, p. 20) and that PEA has developed a comprehensive HSP that represents the site-based program while still allowing flexibility for families. These services include space at the school site, which is staffed by credentialed personnel; ongoing tutoring; and regular scheduled meetings to review assignments and standards, and assign new materials. Additionally, HSP pupils are expected to complete a service learning project and are provided the opportunity to present their learning to other pupils and/or community members as organized by the HSP teacher (Attachment 3, p. 22).

Further, the PEA petition states that the school will comply with all specific laws applicable to independent study including *EC* sections 47612.5 and 51745 (Attachment 3, p. 22).

##### Plan for Low-Achieving Pupils

The PEA petition states that it will take a systematic approach to closing the achievement gap by allocating multiple resources and interventions to academically low-performing pupils (Attachment 3, p. 40). PEA will identify academically low-achieving pupils through state and teacher assessments, and classroom assignments. All pupils will be assessed at the beginning of each term allowing staff to identify the learning needs of pupils as well as be monitored with quarterly benchmarks to determine progress. The PEA petition lists the following interventions to be given to pupils depending on identified needs (Attachment 3, p. 41):

* Instructional modification: instructional activities and materials may be modified to accommodate different learning styles and needs, such as the provision of accessible text.
* Support classes: proposed schedule includes special, intervention, and expedition periods where pupils can receive additional support from certificated staff, as needed.
* Computer-based interventions: academic intervention software for skill remediation, preparation, and/or support with core class work.

Additionally, the PEA petition states that if a pupil is still not achieving at grade-level standards despite consistent participation in the above interventions, a meeting will be conducted with the pupil’s parent or guardian, and school.

##### Plan for High-Achieving Pupils

The PEA petition states that it intends to offer opportunities for all pupils to seek extra development beyond grade level and extend their work beyond expectations. Pupils will be identified as high achievers through web-based diagnostics, classroom report cards, placement test results, and teacher recommendations. The Otis-Lenon School Ability Test will be used for additional designation as gifted (Attachment 3, p. 40).

The PEA petition lists the following program offerings:

* Development and expertise in specified areas of interest
* Concept modeling
* Problem solving activities
* Advanced classes offered during or outside school hours
* Special projects and assignments
* Independent study projects
* Online courses

##### Plan for English Learners

The PEA petition states that it will comply with all applicable legal requirements for ELs as they pertain to annual notifications to parents, student identification, placement, program options, EL and core content instruction, teacher qualifications and training, reclassification to fluent English proficient status, monitoring and evaluation of program effectiveness, and standardized testing requirements. Additionally, PEA will implement policies to assure proper placement, evaluation, and communication regarding ELs and the rights of pupils and parents. Although the PEA petition outlines strategies for EL instruction and intervention, it does not include a description of how and when EL pupils will receive targeted English language development (ELD) instruction that is aligned to English language arts/ELD standards. The PEA petition states the criteria for reclassification procedures when determining whether to classify a pupil as proficient in English as well as states that reclassified fluent English proficient pupils will be monitored for four years after reclassification (Attachment 3, p. 39).

##### Plan for Special Education

The PEA petition states that it shall comply with all applicable state and federal laws in serving pupils with disabilities, including, but not limited to, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Individuals with Disabilities in Education Improvement Act (Attachment 3, p. 23). The PEA petition identifies a plan for pupils with disabilities, including child find, referral for assessment, development and implementation of the Individualized Education Program (IEP), IEP review, procedural safeguards, interim and initial placements, special education strategies for instruction and services, staffing, and reporting (Attachment 3, pp. 24–37).

### 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 PEA 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. PEA plans to reside within THSD, which is comprised of 257 pupils; 58 percent of those pupils identify as socioeconomically disadvantaged. The PEA petition includes a table that outlines the goals, actions, measurable outcomes, and method of measurement for each of the eight state priorities; however, it does not include measurable outcomes for each of the significant subgroups nor are the outcomes measurable. (Attachment 3, pp. 44–54).

If approved by the SBE, as a condition for approval, the petitioner will be required to revise the PEA petition in order to reflect the SBE as the authorizer and include the necessary language for Element 2–Measurable Pupil Outcomes by outlining the MPOs for the significant subgroups the PEA petition proposes to serve and that all outcomes are measurable.

### 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 PEA petition does present a reasonably comprehensive description of the method for measuring pupil progress. The PEA petition includes information pertaining to the collection, analysis, and reporting of pupil achievement and communication (Attachment 3, pp. 42–44). The PEA petition states that each pupil, parent/guardian, and staff member will develop measurable learning results for each pupil, with progress being assessed, at a minimum, twice annually. PEA is committed to meeting all statewide standards and will utilize, among other assessments, the state summative assessments and the Northwest Evaluation Association Measurement of Academic Progress assessments.

### 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 PEA petition presents a reasonably comprehensive description of the PEA governance structure. PEA will be a directly-funded independent charter school and will be operated as a California non-profit public benefit corporation, pursuant to California law. PEA will be governed by the PEA’s corporate Board of Directors; the PEA petition includes the names and term expiration dates of the initial board of directors. Additionally, parents will be consulted and advised regarding PEA’s educational programs and pupil progress through meetings and informational bulletins. Parents are encouraged to volunteer and serve on the School Site Advisory Council, an advisory body that will assist in identifying weaknesses and strengths in the educational program and operations of PEA that need to be addressed (Attachment 3, pp. 54–62). Additionally, the PEA petition states that it will comply with the requirements of Senate Bill 126, including the Ralph M. Brown Act, Political Reform Acts, Public Records Acts, and *Government Code* Section 1090.

### 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. | Yes |

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

#### Comments

The PEA petition does not present a reasonably comprehensive description of employee qualifications. The PEA petition describes qualifications for the following: core subject and independent study teachers; lead teacher (leader of the charter school); and business development and operations coordinator (Attachment 3, pp. 63–66). However, although the PEA petition states that it will seek to hire noncertificated instructional support staff, it does not describe general specifications and qualifications for noncertificated employees

The PEA petition states that teachers will hold a Commission on Teacher Credentialing (CTC) certificate, permit, or other document equivalent to that which a teacher in a non-charter public school would be required to hold and recognizes, under Assembly Bill 1505, the following (Attachment 3, p. 63):

* Teachers in charter schools shall hold the CTC certificate, permit, or other document required for the teacher’s certificated assignment. These documents shall be maintained on file at the charter school and are subject to periodic inspection by the chartering authority.
* By July 1, 2020, all teachers in charter schools shall obtain a certificate of clearance and satisfy the requirements for professional fitness pursuant to *EC* sections 44339, 44340, and 44341.

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

### 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. | Yes |
| 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 present a reasonably comprehensive description of health and safety procedures.**

#### Comments

The PEA petition does present a reasonably comprehensive description of health and safety procedures. The PEA petition states that it will adopt and implement health and safety policies and procedures, and risk management policies in consultation with insurance carriers and risk management experts, which will be incorporated into PEA’s pupil and staff handbooks. All enrolled pupils and staff will be required to provide records documenting immunizations as required in public schools. The PEA petition states that employees and contractors of PEA will be required to submit a criminal background check and furnish a criminal record summary as required by *EC* sections 44237 and 45125.1. Employees and volunteers who have frequent or prolonged contact with pupils will be assessed and examined for tuberculosis prior to commencing employment and working with pupils, and for employees at least once every four years thereafter, as required by *EC* Section 49406. Pupils will be screened for vision, hearing, and scoliosis (Attachment 3, pp. 66–72).

### 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 PEA petition does present a reasonably comprehensive description of means for achieving racial and ethnic balance. The PEA petition outlines strategies to ensure a racial and ethnic balance that is reflective of the district as well as provides a yearly self-evaluation process regarding these processes and making any adjustments accordingly (Attachment 3, p. 72).

### 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 PEA petition does present a reasonably comprehensive description of admission requirements. The PEA petition states that it shall be an open enrollment, tuition free public school with no specific requirements for admission as outlined in *EC* Section 47605(d)(2)(A). The PEA petition states that admission preferences in the case of a public random drawing shall be given to the following pupils in the following order (Attachment 3, pp. 72–75):

* Pupils who are currently attending PEA
* Pupils who reside in the school district
* Children of PEA teachers and staff
* Children of the founding group members of the school identified in the initial charter (not to exceed 10 percent of total pupils enrolled)
* Siblings of pupils admitted to or attending PEA
* All other applicants

The SBE has the discretion to approve the proposed preferences in the PEA 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 PEA petition does present a reasonably comprehensive description of annual independent financial audits (Attachment 3, pp. 75–76).

### 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. | Yes |
| 1. Identify the procedures by which pupils can be suspended or expelled. | No |
| 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 PEA petition does not present a reasonably comprehensive description of suspension and expulsion procedures.

Addressing evaluation criteria A, B, and D, the PEA petition states that the pupil suspension and expulsion policy has been established in order to promote learning and protect the safety and well-being of all pupils at PEA. The PEA petition lists discretionary and non-discretionary offenses and procedures for suspension and expulsion (Attachment 3, pp. 77–85). However, the PEA petition will need to be updated to reflect that new prohibitions will be in place effective July 1, 2020, on the basis of disruption and willful defiance, which includes that no pupil can be suspended or expelled for disruption and/or willful defiance. The PEA petition states that it is committed to the annual review and modification of the list of offenses, and policies and procedures surrounding suspension and expulsion (Attachment 3, p. 77). The PEA petition states that no pupil shall be involuntarily removed by PEA for any reason unless the parent or guardian of the pupil has been provided written notice of intent to remove the pupil no less than five school days before the effective date of the action (Attachment 3, p. 78). Additionally, the PEA petition states that a pupil may be expelled either by the neutral and impartial charter school board following a hearing before it or by the charter school board upon the recommendation of a neutral and impartial administrative panel, to be assigned by the charter school board as needed. The Administrative Panel shall consist of at least three members who are certificated and neither a teacher of the pupil nor a member of the charter school’s board (Attachment 3, p. 87).

Addressing evaluation criteria C and E, the PEA 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 PEA, the pupil shall remain in the interim alternative educational setting pending the decision of the hearing officer in accordance with state and federal law, including 20 *United States Code* (*USC*) Section 1415(k), until the expiration of the 45-day time period provided for in an interim alternative educational setting, unless the parent and PEA agree otherwise (Attachment 3, p. 87); however, the automatic placement of a pupil in an interim alternative educational setting until the expiration of the 45-day time period is contrary to 20 *USC* Section 1415(k)(3), which only gives a hearing officer the authority to order such a placement.

Additionally, the PEA petition does not include the following:

* In accordance with 20 *USC* Section 1415(k)(3), if a parent or guardian disagrees with any decision regarding placement, or the manifestation determination, or if PEA believes that maintaining the current placement of the pupil is substantially likely to result in injury to the pupil or to others, the parent or guardian, or PEA may request a hearing.
* In such an appeal, a hearing officer may: (1) return a pupil with a disability to the placement from which the pupil was removed; or (2) order a change of placement of a pupil with a disability to an appropriate interim alternative setting for not more than 45 school days if the hearing officer determines that maintaining the current placement of such pupil is substantially likely to result in injury to the pupil or to others.

If approved by the SBE, as a condition for approval, the petitioner will be required to revise the PEA petition to include the necessary language for Element 10–Suspension and Expulsion Procedures that when an appeal relating to the placement of the pupil or the manifestation determination has been requested by either the parent or PEA, the pupil shall remain in the interim alternative educational setting pending the decision of the hearing officer or until the expiration of the time period provided in 20 *USC* Section 1415(k)(1)(C), whichever occurs first, unless the parent and PEA agree otherwise. Additionally, the petitioner will be required to revise to PEA petition to include the language provided above.

### 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 PEA petition does present a reasonably comprehensive description of CalSTRS, CalPERS, and social security coverage. The PEA petition states that all eligible certificated employees of PEA will have membership in CalSTRS and that all eligible classified employees will participate in CalPERS (Attachment 3, p. 93).

However, the budget narrative, assumptions and multi-year financial plan does not mention or include CalPERS contribution. In the budget narrative, PEA includes a statement that PEA will offer CalSTRS for eligible employees but does not mention CalPERS as an option for non-certificated employees.

### 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 PEA petition does present a reasonably comprehensive description of public school alternatives (Attachment 3, p. 93).

### 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 PEA petition does present a reasonably comprehensive description of post-employment rights of employees (Attachment 3, p. 93).

### 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. | No |
| 1. Describe how the costs of the dispute resolution process, if needed, would be funded. | No |
| 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. | No |

**The petition does not present a reasonably comprehensive description of dispute resolution procedures.**

#### Comments

The PEA petition does not present a reasonably comprehensive description of dispute resolution procedures (Attachment 3, pp. 94–95).

The CDE notes that the petitioner included a letter, dated February 19, 2020, outlining necessary changes to the PEA petition should the SBE become the authorizer (Attachment 5). However, the PEA letter did not include the following:

* Specific provisions relating to dispute resolution that the SBE determines necessary and appropriate in recognition of the fact that the SBE is not a local educational agency.
* Description of how the costs of the dispute resolution process, if needed, would be funded.
* Recognition 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.

Additionally, the PEA petition must recognize that the SBE is not a local educational agency and cannot be pre-bound to an obligation to split the costs of mediation or agree to participate in mediation to resolve disputes.

If approved by the SBE, as a condition for approval, the petitioner will be required to revise the PEA petition in order to reflect the SBE as the authorizer and include the necessary language for Element 14–Dispute Resolution Procedures.

### 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 PEA petition does include a reasonably comprehensive description of closure procedures (Attachment 3, pp. 95–96).

## 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 PEA petition does provide evidence addressing the requirements regarding standards, assessments, and parent consultation (Attachment 3, pp. 4–5).

### 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. | Yes |
| * 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. | Yes |

**The petition does provide the required information and financial projections.**

#### Comments

The PEA petition does provide the required information and financial projections (Attachment 4).

The petitioner intends to lease a facility located at 30433 Old Strawberry Road, which is within the boundaries of THSD. The facility is owned by the Pinecrest Permittees Association and is the former site of Pinecrest Elementary, which closed in 2012.

### 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 PEA petition does meet this requirement (Attachment 3, pp. 4 and 63).

### 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 PEA petition does address this requirement (Attachment 3, p. 76).

The PEA petition states that the annual audit will be completed and forwarded to the district, the county superintendent of schools, the state controller, and the CDE.

### 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 PEA petition does not address this requirement. The PEA petition includes a table that outlines the actions, measurable outcomes, and method of measurement aligned to each of the eight state priorities (Attachment 3, pp. 44–54); however, the PEA petition does not outline MPOs that address increases in pupil academic achievement both schoolwide and for all groups of pupils that PEA intends to serve.

### 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

PEA does not plan to serve secondary pupils.