

This document was provided, as is, to the California Department of Education (CDE) by the **Los Angeles International Charter High School**. This document is posted to the CDE Web site to meet the legal requirements of California *Education Code* Section 33009.5.

For more information regarding the content of this material, please contact the Charter Schools Division by phone at 916-322-6029 or by e-mail at charters@cde.ca.gov.



Los Angeles County Office of Education

Serving Students • Supporting Communities • Leading Educators

January 24, 2019

Debra Duardo, M.S.W., Ed.D.
Superintendent

*Via first Class Mail & Email to:
asims@laicharter.org*

Los Angeles County
Board of Education

Thomas A. Saenz
President

James Cross
Vice President

Candace Bond McKeever

Douglas R. Boyd

Alex Johnson

Gregory McGinity

Monte E. Perez

Ms. Angelique R. Sims, Lead Petitioner
Los Angeles International Charter High School
625 Coleman Ave.
Los Angeles, CA 90042

Dear Ms. Sims:

Confirmation of County Board Action on the Los Angeles International Charter High
School Renewal Petition

This letter serves as confirmation of the action taken by the Los Angeles County Board of
Education (County Board) on the renewal petition for Los Angeles International Charter
High School.

At its regular meeting held Tuesday, January 22, 2019, the County Board took action to
deny the renewal petition. Attached are copies of the findings of fact and approved action
taken by the County Board, which constitutes the final order in this matter.

Should you have any questions, please do not hesitate to contact the Charter School Office
at (562) 922-8806.

Sincerely,

A handwritten signature in blue ink, appearing to read "Indra Ciccarelli".

Indra Ciccarelli
Director II
Charter School Office
Division of Accountability, Support and Monitoring

IC:ls
Attachments

c: Lisa Constancio, Director, Charter Schools Division, CDE
Carrie Lopes, Education Administrator, Charter Schools Division, CDE
Sandi Ridge, Education Programs Consultant, Charter Schools Division, CDE
Barry Grooves, President, Western Association of Schools and Colleges
Austin Beutner, Superintendent, LAUSD
José J. Cole-Gutiérrez, Director, Charter Schools Division, LAUSD

Ms. Angelique R. Sims, Lead Petitioner
Los Angeles International Charter High School
January 24, 2019
Page 2

c: Debra Duardo, M.S.W., Ed.D., Superintendent, LACOE
Arturo Valdez, Chief Academic Officer, Educational Services, LACOE
Patricia Smith, Executive Director, Business Services, LACOE
Dina L. Wilson, Director III, Division of Accountability, Support and Monitoring, LACOE

APPROVED
LOS ANGELES COUNTY
BOARD OF EDUCATION

JAN 22 2019

Board Meeting – January 22, 2019

BY: DD: n
Ex Officio Secretary

Item VII. Recommendations

- A. Adopt the Superintendent's Recommendation to Deny the Renewal Petition for *Los Angeles International Charter High School, Grades 9-12*

The Superintendent recommends that the Los Angeles County Board of Education (County Board) adopt the written findings of fact stated below and take action to deny the renewal petition for Los Angeles International Charter High School (LAICHS).

Los Angeles County Board of Education Findings

The County Board evaluated LAICHS's past performance and renewal petition according to the criteria and procedures established in Education Code (EC) 47605(b), 47607(b), and California Code of Regulations, Title 5 (5 CCR) section 11966.5, and made the following findings of fact for denial:

Finding 1: The charter school does not meet the academic performance criteria specified in EC section 47607(b)(1)-(5) necessary to be considered for renewal.

Finding 2: The petition provides an unsound educational program for students to be enrolled in the school. [EC 47605(b)(1)]

Finding 3: The petitioners are demonstrably unlikely to successfully implement the proposed educational program. [EC 47605(b)(2)]

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

The reasons for denial are based on EC sections 47607(a)(3)(A) and 47605(b), and the 5 CCR section 11966.5(c) as follows:

EC 47607(a)(3)(A) states: The authority that granted the charter shall consider increases in pupil academic achievement for all groups of pupils served by the charter school as the most important factor in determining whether to grant a charter renewal.

The County Board considered increases in pupil academic achievement for all groups of pupils served by LAICHS as the most important factor in determining whether to grant its renewal.

Board Meeting – January 22, 2019
Adopt the Superintendent's Recommendation to Deny the Renewal Petition for *Los Angeles International Charter High School, Grades 9-12*
- 2 -

5 CCR 11966.5(c)(1)-(2) states:

- (1) When considering a petition for renewal, the county board of education shall consider the past performance of the school's academics, finances, and operation in evaluating the likelihood of future success, along with future plans for improvement, if any.
- (2) The county board of education may deny a petition for renewal of a charter school only if [it] makes written factual findings, specific to the particular petition, setting forth facts to support one or more of the grounds for denial set forth, as applicable, in EC 47605(b) or failure to meet one of the criteria set forth in EC section 47607(b).

EC 47605(b) limits reasons for denial to the following:

- (1) The charter school presents an unsound educational program.
- (2) The petitioners are demonstrably unlikely to successfully implement the program.
- (3) The petition does not contain the required number of signatures.
(Not applicable to a renewal petition)
- (4) The petition does not contain an affirmation of specified assurances.
- (5) The petition does not contain reasonably comprehensive descriptions of the required elements.

EC 47607(b) states: To be eligible for renewal, a charter school must meet one (1) of the following five (5) criteria:

- (1) Attained its Academic Performance Index (API) growth target in the prior year or in two of the last three years both schoolwide and for all groups of pupils served by the charter school.
- (2) Ranked in deciles 4 to 10, inclusive, on the API in the prior year or in two of the last three years.
- (3) Ranked in deciles 4 to 10, inclusive, on the API for a demographically comparable school in the prior year or in two of the last three years.
- (4) (A) The entity that granted the charter determines that the academic performance of the charter school is at least equal to the academic performance of the public schools that the charter school pupils would otherwise have been required to attend, as well as the academic performance of the schools in the school district in which the charter school is located, taking into account the composition of the pupil population that is served at the charter school.

Board Meeting – January 22, 2019
Adopt the Superintendent's Recommendation to Deny the Renewal Petition for *Los Angeles International Charter High School, Grades 9-12*
- 3 -

(5) Qualified for an alternative accountability system pursuant to subdivision (h) of Section 52052.

The recommendation for denial is based on the written findings contained in the complete report on the Los Angeles International Charter High School renewal petition, which is attached to the Report Item dated January 22, 2019.

Board Meeting – January 22, 2019

Item V. Reports / Study Topics

A. Staff Findings on the Renewal Petition for *Los Angeles International Charter High School, Grades 9-12* Pursuant to Education Code Sections 47607 and 47605

The Los Angeles International Charter High School (LAICHS) petition is presented to the Los Angeles County Board of Education (County Board) pursuant to Education Code (EC) sections 47607 and 47605. The renewal process requires the authorizer to evaluate both the past performance of the charter school and whether the renewal petition meets the criteria for approval. LAICHS is currently authorized by the Los Angeles County Board of Education.

Charter renewal is governed by EC 47607, 47605 and the California Code of Regulations Title 5 (5 CCR) sections 11966.4 and 11966.5. Critical components of these governing laws are as follows:

EC 47607(b) states that to be eligible for renewal, a charter school must meet one (1) of the following five (5) criteria:

- (1) Attained its Academic Performance Index (API) growth target in the prior year or in two of the last three years both schoolwide and for all groups of pupils served by the charter school.
- (2) Ranked in deciles 4 to 10, inclusive, on the API in the prior year or in two of the last three years.
- (3) Ranked in deciles 4 to 10, inclusive, on the API for a demographically comparable school in the prior year or in two of the last three years.
- (4) (A) The entity that granted the charter determines that the academic performance of the charter school is at least equal to the academic performance of the public schools that the charter school pupils would otherwise have been required to attend, as well as the academic performance of the schools in the school district in which the charter school is located, taking into account the composition of the pupil population that is served at the charter school. (Emphasis added)
- (5) Qualified for an alternative accountability system pursuant to subdivision (h) of Section 52052.

EC 47607(a)(3)(A) states that the authority that granted the charter shall consider increases in pupil academic achievement for all groups of pupils served by the charter school as the most important factor in determining whether to grant a charter renewal. (Emphasis added)

Board Meeting – January 22, 2019

Staff Findings on the Renewal Petition for *Los Angeles Charter High School, Grades 9-12* Pursuant to Education Code Sections 47607 and 47605

- 2 -

5 CCR 11966.5(c)(1-2) provides the considerations and criteria to be used by a county board for making a determination as to whether to renew a charter: When considering a petition for renewal, the county board of education shall consider the past performance of the school's academics, finances, and operation in evaluating the likelihood of future success, along with future plans for improvement, if any.

(1) The county board of education may deny a petition for renewal of a charter school only if [it] makes written factual findings, specific to the particular petition, setting forth facts to support one or more of the grounds for denial set forth, as applicable, in **EC 47605(b) or failure to meet one of the criteria set forth in EC section 47607(b)**. (Emphasis added)

EC 47607(a)(2) states that renewals of charters are governed by the standards and criteria in 47605, and shall include, but not be limited to, a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed.

EC 47605(b) requires a school district governing board to be guided by the intent of the legislature that charter schools should become an integral part of the education system and that a charter be granted if the governing board is satisfied that granting the charter is consistent with sound educational practice.

EC 47605(b) further states that a governing board may only deny a petition if it provides written factual findings specific to the petition that supports one or more of the following findings:

- (1) The charter school presents an unsound educational program.
- (2) The petitioners are demonstrably unlikely to successfully implement the program.
- (3) The petition does not contain the required number of signatures.
(*Not applicable to a renewal petition*)
- (4) The petition does not contain an affirmation of specified assurances.
- (5) The petition does not contain reasonably comprehensive descriptions of 15 required elements of a charter.

The County Board shall evaluate the petition according to the criteria and procedures established in law and may only deny the petition if it provides written findings addressing the reasons for the denial.

A summary of key findings is presented through the table on the following page.

The complete report on the written findings of fact is attached. LACOE staff will present the report to the County Board.

Board Meeting – January 22, 2019

Staff Findings on the Renewal Petition for *Los Angeles Charter High School, Grades 9-12* Pursuant to Education Code Sections 47607 and 47605

- 3 -

Los Angeles International Charter High School Petition for Renewal		Meets Requirements*	
EC 47607(b): Failure to meet at least one of the academic performance criteria for renewal is grounds for denial.			
Finding 1	The charter school provided evidence it met one of the statutory criteria for renewal.	No	
EC 47605(b): Failure to meet the criteria under Findings 2-5 is grounds for denial.			
Finding 2	Sound Educational Practice	No	
Finding 3	Ability to Successfully Implement Intended Program	No	
Finding 4	Affirmation of Specified Conditions	Yes	
Finding 5: The charter petition contains a reasonably comprehensive description of all required elements.	1	Description of Educational Program	No
	2	Measureable Pupil Outcomes	No
	3	Method for Measuring Pupil Progress	No
	4	Governance Structure	No
	5	Employee Qualifications	No
	6	Health and Safety Procedures	Yes*
	7	Racial and Ethnic Balance	Yes*
	8	Admission Requirements	Yes*
	9	Annual Independent Financial Audits	No
	10	Suspension and Expulsion Procedures	No
	11	Retirement Coverage	Yes
	12	Public School Attendance Alternatives	Yes
	13	Post-employment Rights of Employees	Yes
	14	Dispute Resolution Procedures	Yes
	15	Closure Procedures	No
Finding 6: The charter petition meets the additional statutory requirements EC 47605 (c), (e) – (h), (l) and (m)	(c)	Standards, Assessments and Parent Consultation	Yes
	(e)	Employment is Voluntary	Not Applicable
	(f)	Pupil Attendance is Voluntary	Not Applicable
	(g)	Effect on Authorizer and Financial Projections Facilities, Administrative Services, Civil Liability and Financial Statements	Yes
	(h)	Targets Academically Low Achieving Pupils**	Qualifies
	(l)	Teacher Credentialing	No
	(m)	Transmission of Audit Report	Yes
<p><i>*Elements marked as meeting requirements may need further explanation, adjustment or technical changes; however, they are reasonably comprehensive and/or substantively comply with regulatory guidance and the LACOE standard of review described in Board Policy and the Superintendent's Administrative Regulations.</i></p> <p><i>**Charters created to target academically low achieving pupils are given a priority for authorization.</i></p> <p><i>^There are indicators of potential civil liability effects upon the authorizer.</i></p>			

Los Angeles County Office of Education
Charter School Office
Date: January 22, 2019

Staff Findings on the Renewal Petition for *Los Angeles International Charter High School, Grades 9-12*
Renewal of a Charter Authorized by the Los Angeles County Board of Education

Background Information

The petition for *Los Angeles International Charter High School (LAICHS)* is to renew the charter for a grades 9-12 school as well as request material revisions. The petition proposes to add grades 6-8 and an Independent Study Program, and to change the school name to Los Angeles International Charter School. The school is located at 625 Coleman Ave., Los Angeles, 90042, within the geographic boundaries of the Los Angeles Unified School District (LAUSD).

LAICHS was authorized on appeal by the Los Angeles County Board of Education (County Board) in 2009 and renewed on March 11, 2014, for a term of five (5) years commencing July 1, 2014, and ending June 30, 2019.

LAICHS was first approved by the LAUSD Board of Education (LAUSD Board) on June 14, 2005, for a three-year term that was extended for one year in May 2008. The LAUSD Board denied the LAICHS renewal petition on March 24, 2009, based in part upon findings of unsatisfactory Governance, Organizational Management, and Fiscal Operations.

LAICHS is operated by a 501(c)(3) nonprofit benefit corporation.

Mission: “The mission of the Los Angeles International Charter High School (LAI or LAICHS) is to close the achievement gap and to provide all students with the opportunity for a world-class, college-preparatory education and to graduate leaders who are prepared to succeed in the nation’s top universities and be productive citizens.”

Vision: “Through a safe, supportive environment that is conducive for teaching and learning, LAI will offer real-world learning experiences through collaborations with non-profit organizations, local colleges and universities as well as other charter schools.”

Students Served by the School: LAICHS currently serves 145 students in grades 9-12. The petition states that enrollment is drawn largely from the Northeastern Los Angeles community. Northeast Los Angeles is comprised of Cypress Park, Eagle Rock, El Sereno, Highland Park, Lincoln Heights, Montecito Heights, and Mount Washington.

The school’s demographic composition is presented in the chart below:

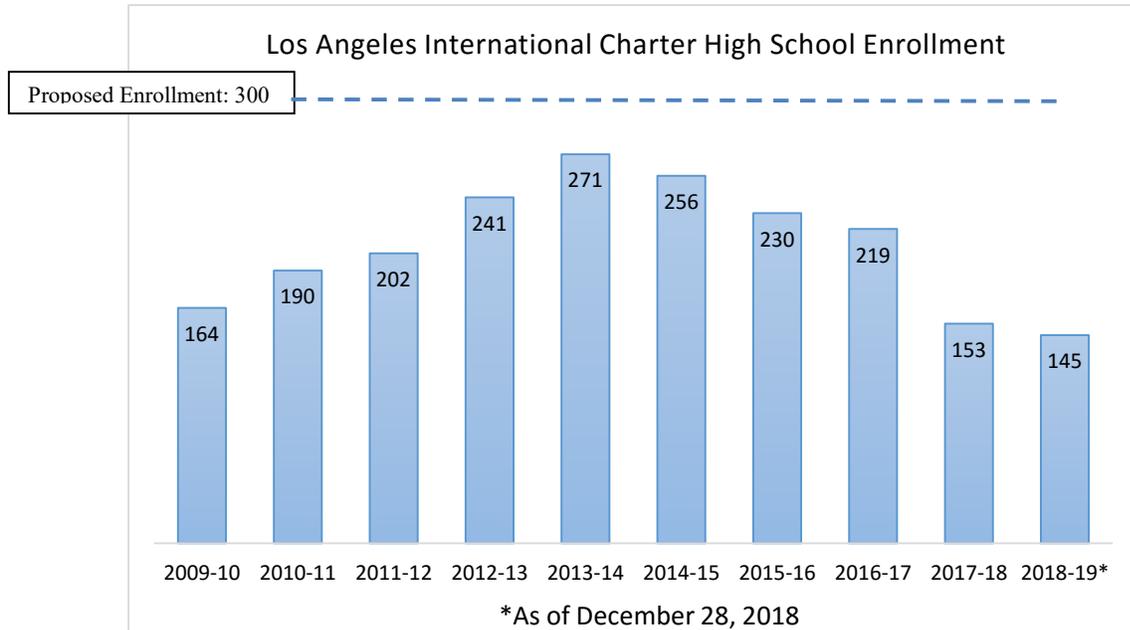
Enrollment Demographic Data for LAICHS

School Name (Grade Levels)	Enrollment	2017-18 School Demographics						
		Hispanic	African American	White	Asian	EL	SED	SWD
Los Angeles International Charter (9-12)	153	88.2%	2.6%	2.6%	---	6.5%	79.1%	15.7%

EL = English Learners, SED=Socioeconomic Disability, SWD = Students with Disabilities, “—”=no data available
Source: CDE Data and Statistics/Demographics Student & School/Data Files (Downloadable)/Enrollment by School
<http://www.cde.ca.gov/ds/sd/sd/filesenr.asp>

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

Enrollment over the previous (2009-2014) and current charter term (2014-2019) is shown in the following chart:



When the County Board last approved the LAICHS charter in 2014, the school was in a fifth year of enrollment growth. Since the renewal LAICHS has experienced five years of enrollment decline.

There has been significant turnover in LAICHS administrative and teacher staffing since 2014, with only one (1) person still present (IT Coordinator). There have been three (3) Executive Directors within two (2) years (2016-2017). Additionally, all of those currently serving on the LAICHS Board of Directors have started since the last charter renewal.

REQUIREMENTS FOR CHARTER RENEWAL

Charter renewal is governed by *Education Code (EC)* sections 47605 et seq., the Charter Schools Act. The LACOE Charter School Review Team (Review Team) considered the petition according to the requirements of the *EC* and other pertinent laws and regulations, and guidance established in the California Code of Regulations (CCR), *County Board Policy (BP)* and Superintendent's *Administrative Regulations (AR)*.¹ The following section provides the legal criteria for renewal consideration and an analysis of whether LAICHS meets those standards.

EC 47607(a)(2): *Renewals...of charters are governed by the standards and criteria in section 47605, and shall include, but not be limited to, a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed.*

The Review Team determined whether each required element in the renewal petition complies with current legal requirements and whether the petitioners demonstrated they are familiar with current legal requirements through the Capacity Interview. If the petition did not comply, or the petitioners were

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

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

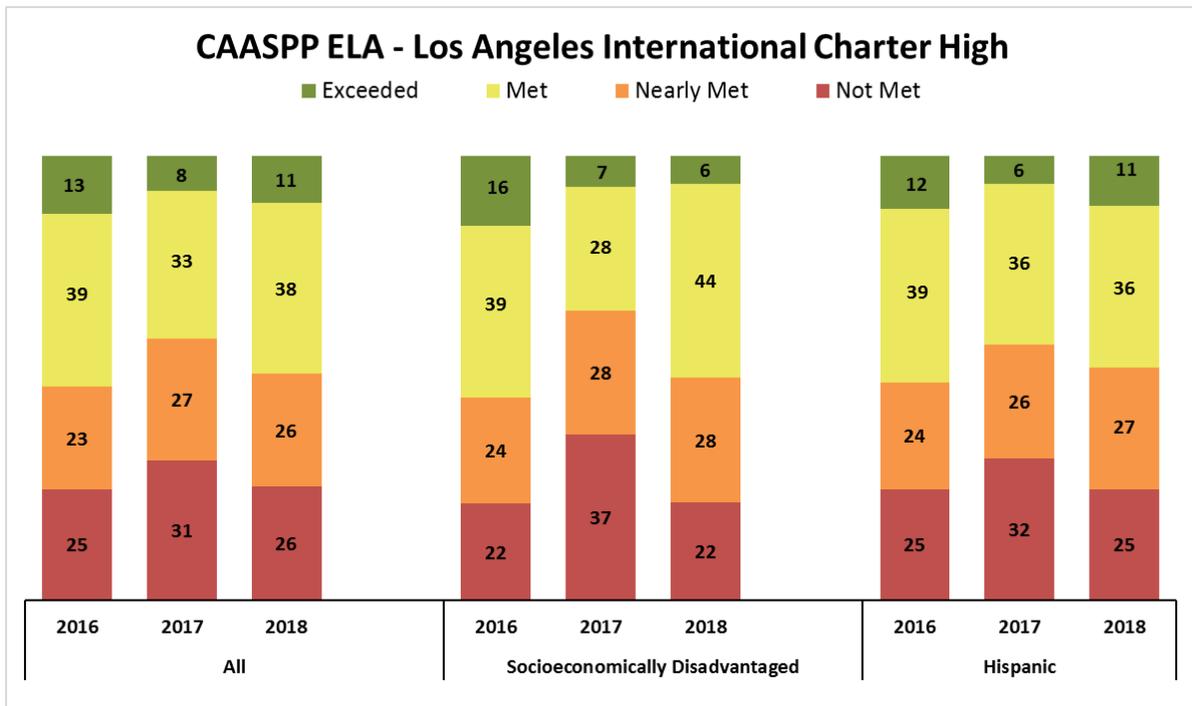
unfamiliar with current law, the Review Team noted the deficiency through the applicable finding and cited the applicable statute herein. [EC 47607(a)(2)]

EC 47607(a)(3)(A): *The authority that granted the charter shall consider increases in pupil academic achievement for all groups of pupils served by the charter school as the most important factor in determining whether to grant a charter renewal.*

Schoolwide California Assessment of Student Performance and Progress (CAASPP) Data:

English-Language Arts (ELA): An analysis of the CAASPP ELA data over three (3) years (2016 to 2018) shows declines in ELA schoolwide and for all student groups. Schoolwide, the rate of students meeting or exceeding standard dropped from 52% to 49% over the three-year period with a low of 41% in 2017. CAASPP ELA data over four (4) years (2015 to 2018) shows even larger declines of 78% to 49% met or exceeded in ELA schoolwide (not shown).

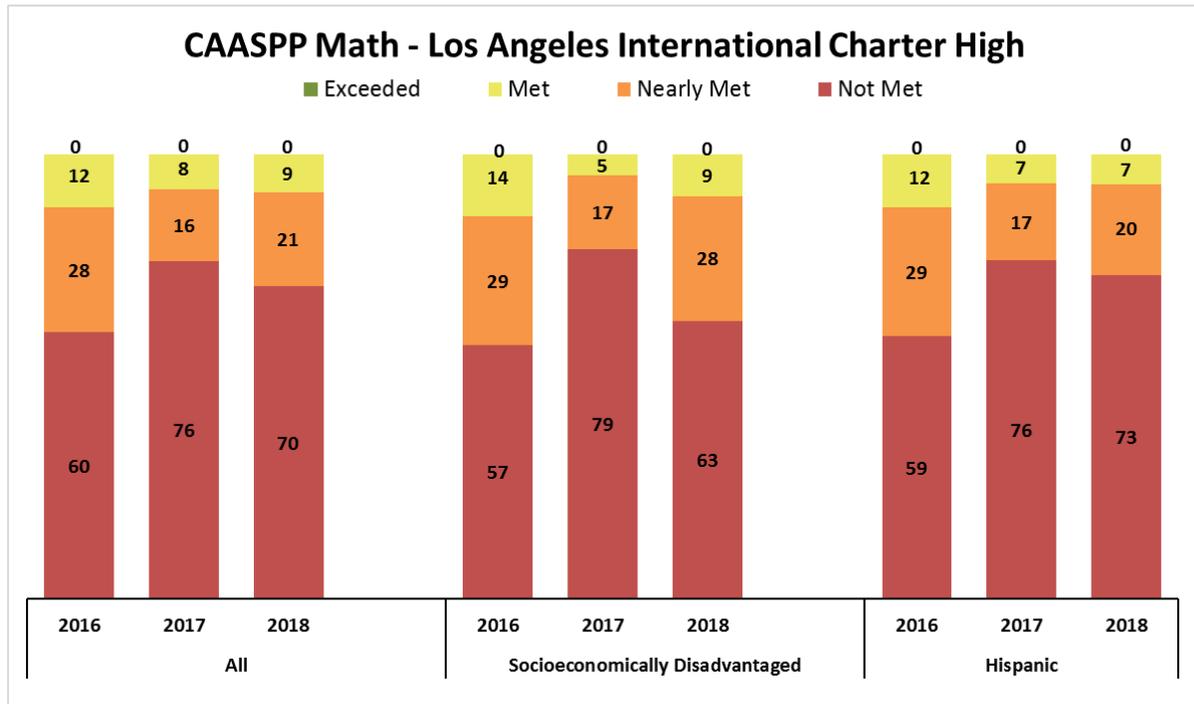
Numerically significant student groups showed the following decreases in proficiency over the past three (3) years: Socioeconomically Disadvantaged students decreased by 5% and Hispanic students decreased by 4%.



Mathematics: An analysis of the CAASPP math data over three (3) years (2016 to 2018) shows declines in math schoolwide and for all student groups. Schoolwide, the rate of students meeting or exceeding standard dropped from 12% to 9% over the three-year period. CAASPP math data over four (4) years (2015 to 2018) shows even larger declines of 78% to 49% met or exceeded in math schoolwide (not shown).

Numerically significant student groups showed the following decreases in math proficiency over the past three (3) years: Socioeconomically Disadvantaged students decreased by 5% and Hispanic students decreased by 5%. For the last three (3) years, no students have exceeded standards in math and a majority of students fell into the lowest, 'Not Met' category, for math proficiency.

Staff Findings on the Renewal Petition for Los Angeles International Charter High School



Analysis: Based on the analysis presented above, the Review Team determined that LAICHS has not demonstrated *increases in pupil academic achievement for all groups of pupils served by the charter school*. Since 2016, the percentage of students meeting or exceeding CAASPP ELA standards schoolwide and for all numerically significant subgroups has decreased. In addition, the percentage of students meeting or exceeding CAASPP math standards has decreased both schoolwide and for all numerically significant student subgroups.

EC 47607(b): *Commencing on January 1, 2005, or after a charter school has been in operation for four years, whichever date occurs later, a charter school shall meet at least one (1) of the following criterion before receiving a charter renewal:*

- (1) *Attained its API growth target in the prior year or in two of the last three years both school-wide and for all groups of pupils served by the charter school.*
- (2) *Ranked in deciles 4 to 10, inclusive, on the API in the prior year or in two of the last three years.*
- (3) *Ranked in deciles 4 to 10, inclusive, on the API for a demographically comparable school in the prior year or in two of the last three years.*
- (4)(A) *The entity that granted the charter determines that the academic performance of the charter school is at least equal to the academic performance of the public schools that the charter school pupils would otherwise have been required to attend, as well as the academic performance of the schools in the school district in which the charter school is located, taking into account the composition of the pupil population that is served at the charter school.*
- (5) *Qualified for an alternative accountability system pursuant to subdivision (h) of Section 52052.*

Considering the state did not generate API scores after 2013, LAICHS cannot qualify for renewal under EC 47607(b)(1), (2), or (3). LAICHS is not an alternative accountability system school and therefore cannot qualify for renewal under EC 47607(b)(5).

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

It is necessary to consider the school's performance under the fourth criterion listed above. The determination shall be based on the following:

*(A) The entity that granted the charter determines that the **academic performance** of the charter school is at least equal to the academic performance of the public schools that the charter school pupils would otherwise have been required to attend, as well as the academic performance of the schools in the school district in which the charter school is located, taking into account the composition of the pupil population that is served at the charter school.*

(B) The determination made pursuant to this paragraph shall be based upon all of the following: (i) Documented and clear and convincing data. (ii) Pupil achievement data from assessments, including, but not limited to, the Standardized Testing and Reporting Program established by Article 4 (commencing with Section 60640) for demographically similar pupil populations in the comparison schools. (iii) Information submitted by the charter school.

(C) A chartering authority shall submit to the [State] Superintendent copies of supporting documentation and a written summary of the basis for any determination made pursuant to this paragraph. The Superintendent shall review the materials and make recommendations to the chartering authority based on that review. The review may be the basis for a recommendation made pursuant to Section 47604.5.

(D) A charter renewal may not be granted to a charter school prior to 30 days after that charter school submits materials pursuant to this paragraph.

LAICHS Academic Criteria for Renewal Consideration:

The following analysis reviews the academic performance of LAICHS as compared to its resident and comparison schools in CAASPP ELA and math performance. Resident schools considered are those in which 2.5% or more of LAICHS's students would otherwise be enrolled, while comparison schools considered are those within LAUSD serving comparable grade levels and student demographics.

Resident School Analysis:

Schoolwide:

In ELA, LAICHS had a lower percentage of students meeting or exceeding standards than three (3) out of five (5) resident schools for all three (3) comparison years.

In math, LAICHS had a lower percentage of students meeting or exceeding standards than four (4) out of five (5) resident schools for all three (3) comparison years.

Hispanic Student Subgroup:

In ELA, LAICHS had a lower percentage of Hispanic students meeting or exceeding standards than three (3) out of five (5) resident schools for two (2) out of three (3) comparison years, outperforming only one (1) resident school in 2016.

In math, LAICHS had a lower percentage of Hispanic students meeting or exceeding standards than four (4) out of five (5) resident schools for 2017 and 2018. In 2016, Hispanic students at LAICHS had a lower percentage than all five (5) resident schools.

Socioeconomically Disadvantaged Student Subgroup:

In ELA, LAICHS had a lower percentage of Socioeconomically Disadvantaged students meeting or exceeding standards than two (2) out of five (5) resident schools 2016 and 2018. In 2017, Socioeconomically Disadvantaged students at LAICHS had a lower percentage than all five (5) resident

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

schools.

In math, LAICHS had a lower percentage of Socioeconomically Disadvantaged students meeting or exceeding standards than four (4) out of five (5) resident schools for all three (3) comparison years.

CAASPP 11th Grade: ELA % Met & Exceeded for LAICHS and Resident Schools

School (Grades)	ALL			Hispanic			SED		
	2016	2017	2018	2016	2017	2018	2016	2017	2018
Los Angeles Int. Charter HS (9-12)	52	41	49	51	43	48	55	35	50
Alhambra High School (9-12)	65	68	65	54	59	50	64	67	63
Belmont Senior High School (9-12)	53	39	37	52	39	36	51	39	37
Benjamin Franklin High School (6-12)*	63	62	50	62	59	48	63	63	49
LA River at Sotomayor Acad (9-12)	38	37	55	39	38	55	36	38	53
Woodrow Wilson Senior High (9-12)	52	48	43	51	45	41	53	48	44

SED=Socioeconomic Disadvantaged *Grade 11 used in comparison
 Source: 2018 CAASPP Research Files <http://caaspp.cde.ca.gov/SB2017/ResearchFileList> as of 10-1-18 Retrieved 10-2-18

CAASPP 11th Grade: Math % Met & Exceeded for LAICHS and Resident Schools

School (Grades)	ALL			Hispanic			SED		
	2016	2017	2018	2016	2017	2018	2016	2017	2018
Los Angeles Int. Charter HS (9-12)	12	8	9	12	7	7	14	5	9
Alhambra High School (9-12)	42	45	44	21	21	16	42	46	42
Belmont Senior High School (9-12)	24	11	14	24	11	11	23	12	13
Benjamin Franklin High School (6-12)*	39	41	31	38	38	29	40	41	30
LA River at Sotomayor Acad (9-12)	12	6	0	13	4	0	13	4	0
Woodrow Wilson Senior High (9-12)	18	19	16	16	16	13	18	20	16

SED=Socioeconomic Disadvantaged *Grade 11 used in comparison
 Source: 2018 CAASPP Research Files <http://caaspp.cde.ca.gov/SB2017/ResearchFileList> as of 10-1-18 Retrieved 10-2-18

Comparison Schools Analysis:

Schoolwide:

In ELA, LAICHS had a lower percentage of students meeting or exceeding standard than two (2) out of four (4) comparison schools for 2016 and 2018, and four (4) out of four (4) comparison schools in 2017.

In math, LAICHS had a lower percentage of students meeting or exceeding standard than all four (4) comparison schools for all three (3) comparison years.

Hispanic Student Subgroup:

In ELA, LAICHS had a lower percentage of Hispanic students meeting or exceeding standards than three (3) out of four (4) resident schools for 2016 and 2018. In 2017, Hispanic students at LAICHS had a lower percentage than all four (4) comparison schools.

In math, LAICHS had a lower percentage of Hispanic students meeting or exceeding standards than all four (4) comparison schools for all three (3) comparison years.

Socioeconomically Disadvantaged Student Subgroup:

In ELA, LAICHS had a lower percentage of Socioeconomically Disadvantaged students meeting or exceeding standards than three (3) out of four (4) resident schools for 2016 and 2018. In 2017,

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

Socioeconomically Disadvantaged students at LAICHS had a lower percentage than all four (4) comparison schools.

In math, LAICHS had a lower percentage of Socioeconomically Disadvantaged students meeting or exceeding standards than all four (4) comparison schools for all three (3) comparison years.

CAASPP 11th Grade: ELA % Met & Exceeded for LAICHS and Comparison Schools

School (Grades)	ALL			Hispanic			SED		
	2016	2017	2018	2016	2017	2018	2016	2017	2018
Los Angeles International Charter (9-12)	52	41	49	51	43	48	55	35	50
Int. Studies Learning Cntr- Legacy HS (6-12)*	50	46	52	50	46	52	48	45	51
James A. Garfield Senior High (9-12)	64	64	65	65	64	64	65	64	65
North Hollywood Senior High (9-12)	59	70	68	50	61	61	53	63	62
PUC Community Charter (6-12)*	47	48	43	49	48	44	46	47	41

SED=Socioeconomic Disadvantaged *Grade 11 used in comparison
 Source: 2018 CAASPP Research Files <http://caaspp.cde.ca.gov/SB2017/ResearchFileList> as of 10-1-18 Retrieved 10-2-18

CAASPP 11th Grade: Math % Met & Exceeded for LAICHS and Comparison Schools

School (Grades)	ALL			Hispanic			SED		
	2016	2017	2018	2016	2017	2018	2016	2017	2018
Los Angeles International Charter (9-12)	12	8	9	12	7	7	14	5	9
Int. Studies Learning Cntr- Legacy HS (6-12)*	31	32	29	31	32	29	31	31	28
James A. Garfield Senior High (9-12)	36	33	39	36	34	39	36	33	39
North Hollywood Senior High (9-12)	38	42	37	25	27	24	28	32	26
PUC Community Charter (6-12)*	32	37	38	33	38	37	34	37	34

SED=Socioeconomic Disadvantaged *Grade 11 used in comparison
 Source: 2018 CAASPP Research Files <http://caaspp.cde.ca.gov/SB2017/ResearchFileList> as of 10-1-18 Retrieved 10-2-18

Analysis: Based on the analysis presented above, the Review Team determined that LAICHS does not qualify for renewal consideration under *EC 47607(b)(4)* as its academic performance is not *at least equal to the academic performance of the public schools that the charter school pupils would otherwise have been required to attend, as well as the academic performance of the schools in the school district in which the charter school is located.*

Los Angeles County Office of Education Review Process

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

Findings of Fact

Finding 1: The charter school has not met the academic performance criteria specified in *EC 47607(b)(4)* necessary to be considered for renewal.

Based on the analysis presented on pages 3-7 of this report, the Review Team determined that LAICHS does not qualify for renewal consideration under *EC 47607(b)(4)* as its academic performance is not *at least equal to the academic performance of the public schools that the charter school pupils would otherwise have been required to attend, as well as the academic performance of the schools in the school district in which the charter school is located.*

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

Finding 2: The renewal petition provides an unsound educational program for students to be enrolled in the school. [EC 47605(b)(1)]

5 CCR 11967.5.1(b) states an educational program shall be considered unsound if any of the following exist:

- (1) *A program that involves activities that...would present the likelihood of physical, educational, or psychological harm to the affected pupils.*
- (2) *A program...not to be likely to be of educational benefit to the pupils who attend.*
- (3) *If the petition is for renewal...and either the charter school has not met the standards for renewal...or the charter school has not met the measurable pupil outcomes as described in its charter.*

The Review Team found evidence for all three of the criteria of an unsound educational program.

For the first indicator, the discipline program at LAICHS may *present the likelihood of...educational, or psychological harm to the affected pupils*. The school has a recent history of higher suspension rates than the district and county with no plan to address the issue.

The new California School Dashboard (Dashboard) contains reports that display the performance of local educational agencies (LEAs), schools, and student groups on a set of state and local measures to assist in identifying strengths, weaknesses, and areas in need of improvement. LEAs and schools receive one (1) of five (5) color-coded performance levels on the state indicators; the five (5) performance levels are: Blue, Green, Yellow, Orange, and Red.²

The most recently released Dashboard for LAICHS indicates a “Red” suspension rate for all LAICHS students and for each significant student group. The suspension rate has been above the school goal of less than 3% for the last three (3) years, with the most recent year being over triple the goal at 9.4%. A comparison of LAICHS with the district, county and state in which it resides is below.

LAICHS Suspension Percentage Data

Year	LAICHS	LAUSD	LA County	State
2015	0%	0.9%	2.2%	3.8%
2016	3.7%	0.9%	2.1%	3.7%
2017	3.5%	0.8%	2.1%	3.6%
2018	9.4%	0.8%	2.0%	3.5%

Source: <https://data1.cde.ca.gov/dataquest/>

Additionally, the school Parent/Student handbook lists 12 or more tardies as grounds for expulsion even though this is not on the provided list of reasons for expulsion.

Furthermore, the petition includes a goal moving forward for a suspension rate of 6% or less, which is well above district, county and state levels as shown in the chart above.

For the second indicator, LAICHS provides *a program...not to be likely to be of educational benefit to the pupils who attend*. From the analysis of the resident schools of 92.3% of LAICHS students represented in the chart below for 2018, at least 51.0% of LAICHS students would have otherwise gone to a resident school with higher ELA performance and at least 86.5% of LAICHS students would have otherwise gone to a resident school with higher math performance. Further details on academic performance for LAICHS can be found on pages 3-7.

² The California Dashboard accountability system defines the colored levels as follows: For suspension rates, Blue=Very Low, Green=Low, Yellow=Medium, Orange=High and Red=Very High. For academic indicators (ELA and Math), Blue= Very High, Green=High, Yellow=Medium, Orange=Low and Red=Very Low.

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

**Academic Performance of LAICHS and Resident Schools
 2018 California Assessment of Student Performance and Progress (CAASPP)**

School (Grades)	% Charter School's Enrollment	ELA (% Met or Exceeded)			Math (% Met or Exceeded)		
		All	SED	Hisp	All	SED	Hisp
Los Angeles International Charter (9-12)		49	50	48	9	9	7
Alhambra High School (9-12)	3.2	65	63	50	44	42	16
Belmont Senior High School (9-12)	3.9	37	37	36	14	13	11
Benjamin Franklin High School (6-12)*	39.4	50	51	49	29	30	28
Eagle Rock High (7-12)*	1.3	59	50	45	35	27	21
Glendale High School (9-12)	1.3	56	49	54	34	29	23
Los Angeles River at Sonia Sotomayor Learning Acad (9-12)	5.8	55	53	55	0	0	0
Woodrow Wilson Senior High (9-12)	37.4	43	44	41	16	16	13

*Grade 11 used in comparison Hisp=Hispanic SED=Socioeconomically Disadvantaged
 Source: 2018 CAASPP Research Files as of 10-1-18 retrieved 10-2-18 Schools below 1% of LAICHS enrollment not displayed

The Review Team has also determined the EL Program at LAICHS is *not likely to be of educational benefit to the pupils who attend LAICHS*. According to a letter from the California Department of Education (CDE) to Charter School Administrators in 2016,³ there is a three part test *to evaluate and determine whether their programs are appropriately addressing the needs of ELs*:

1. *Programs for ELs must be based on a sound educational theory.*
 - The EL Master Plan at LAICHS is outdated and does not use current terms (CCR, CELDT, CST, CAHSEE) or Proposition language (Prop 227). Assessments and curriculum included are either no longer used or do not meet current standards. See Element 1 below for more details.
2. *Programs must be implemented effectively with sufficient resources and personnel.*
 - At the Capacity Interview it was stated that EL students receive 20 minutes a week of designated instruction and that it is not based on an ELD standards-aligned curriculum but rather “to go over homework.”
3. *Programs must be evaluated to determine whether they are effective at having students overcome language barriers and meet the same academic goals set for all other students within a reasonable period of time.*
 - The EL reclassification rate at LAICHS has been zero (0) for two (2) of the last four (4) years.

LAICHS English Learner (EL) % Reclassification Comparison

Year	LAICHS	LAUSD
2015	0%	16.6%
2016	18.2%	12.1%
2017	30%	16.8%
2018	0%	20.1%

Source: <http://www.ed-data.org/index>

For the third indicator, LAICHS both *has not met the standards for renewal* (see Finding 1) and *has not met the measurable pupil outcomes as described in its charter* as shown below:

Measurable Pupil Outcomes: Progress towards meeting the Measurable Pupil Outcomes (MPOs) listed in the current charter was analyzed by the Review Team based on information provided by the school, as well as other publicly available data. Of the 21 MPOs set forth in the current charter, three (3) were fully met,

³ <https://www.cde.ca.gov/sp/el/er/charterschoolleltr.asp>

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

seventeen (17) were not met and one (1) was not applicable. The LAICHS MPOs and corresponding data are displayed in Appendix 2.

Finding 3: The petitioners are demonstrably unlikely to successfully implement the proposed educational program. [EC 47605(b)(2)]

5 CCR 11966.5(c)(1) states: *when considering a petition for renewal, the authorizing entity shall consider the past performance of the school's academics, finances, and operation in evaluating the likelihood of future success, along with future plans for improvement, if any.*

The Review Team determined that the petitioners are demonstrably unlikely to successfully implement the proposed educational program. The following analysis provides an overview of the school's performance during its charter term along with any plans for improvement provided by the school.

Academics

State Testing: While the most recent year of CAASPP results show some improvement over the previous year, the charts above on pages 3-7 show that the percentage of students that met or exceeded standards are lower than three years ago (2015-2016) for both ELA and math, both schoolwide and for all numerically significant subgroups. The drop is even more pronounced from four years ago (2014-2015), the first administration of CAASPP testing (not shown).

The school instituted an English Intervention and Math Intervention class in 2017-2018 in an attempt to address this issue, one section of each. The school plans to add Carnegie Math for intervention starting in 2019-2020.

College/Career Preparedness: LAICHS's California School Dashboard indicates that it performs at the Orange level for all students and at Red for all significant subgroups in preparedness for college/career. It also shows that college/career preparedness is trending downward with the class of 2016 being 64.4% prepared, the class of 2017 being 33.3% prepared and the class of 2018 being 25% prepared.

AP Courses: The LAICHS renewal petition states that five (5) of the six (6) students that passed the AP exam in 2018 did so on the AP Spanish exam. LAICHS has never offered an AP Spanish class so these results are not representative of the LAICHS academic program. In 2017, zero (0) students passed an AP exam.

The petition states that the school would support future growth in AP via the introduction of 9th grade Honors courses but at the Capacity Interview it was said that there are no plans for Honors or AP in the 9th grade.

Western Association of Schools and Colleges (WASC): LAICHS received a renewal for WASC accreditation on May, 1, 2017 (expiring June 30, 2023). The 2017 Initial Visiting Committee Report noted the school's high graduation rate and that 70% of students were on the honor roll but identified several critical areas for follow-up including:

- *Increase rigor in the classroom through WICOR, cooperative learning (accountable talk strategies), additional close and critical reading, mechanism for scaffolding small group discussions*
- *Targeted PD opportunities for teacher growth within disciplines, i.e. innovative teaching strategies, classroom management, visits to other schools, outside PD's*
- *Have a more consistent/rigorous grading policy within departments*

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

English Learner (EL) Reclassification Data: LAICHS does not have an EL Master Plan aligned to current methods for assessment and monitoring. Zero (0) students were reclassified in two (2) of the last four (4) years. See chart on page 10.

Graduation Rate: Since 2015, there has been a 6.5% decrease in the four (4) year cohort graduation rate as shown in the chart below:

LAICHS 4 year Cohort Graduation Rate

Year	Grad Rate
2015	96.5%
2016	91.5%
2017	77.3%
2018	90.0%

Source: <https://data1.cde.ca.gov/dataquest/>

As noted above, the WASC Visiting Committee in 2017 stated that while the graduation rate was high, there needed to be an increase in “rigor in the classroom” as well as “a more consistent/rigorous grading policy within departments.”

Finances

Prior Year Audit Reports: The petition included audit reports for fiscal years 2014-15 through 2017-18. The audits indicate that LAICHS ended 2017-18, with a positive fund balance of \$991,595.

Table 1 below shows the Auditor’s opinion expressed in the Independent Auditors’ Reports during this period for the LAICHS financial statements resulted in Unmodified/Present Fairly opinions, with no findings.

Table1 LAICHS Annual Audit Reports

Fiscal Year	Auditing Firm	Opinion	Findings	Ending Fund Balance per Audit – June 30
2014-15	Wilkinson Hadley King & Co. LLP	Unmodified	None	\$749,763
2015-16	Vicente, Lloyd & Stutzman, CPAs	Present fairly	None	\$785,119
2016-17	CliftonLarsonAllen LLP	Present fairly	None	\$1,021,866
2017-18	CliftonLarsonAllen LLP	Present fairly	None	\$991,595

Source: Annual independent audit reports (2015-2018)

Table 2 illustrates the last four (4) years of Los Angeles International Charter High School, Financial performance (2015 through 2018) through its Cash, Net Assets, Liabilities, Operating Results, Net Cash flow, and Average Daily Attendance (ADA).

Table 2 LAICHS Financial Performance

Year of Operation	Cash	Net Assets	Liabilities	Operating Results	Net Cash Flow	ADA
2014-15	\$395,733	\$749,763	\$62,577	\$150,397	\$254,659	241.93
2015-16	\$470,342	\$785,119	\$63,083	\$35,356	\$74,609	218.91
2016-17	\$847,016	\$1,021,866	\$115,342	\$236,747	\$376,674	200.05
2017-18	\$837,987	\$991,595	\$26,833	(\$30,271)	(\$9,029)	139.23

Source: Annual independent audit reports (2015-2018)

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

Operations

Enrollment and Attrition: As stated on page 2 of this Report, LAICHS enrollment has been in decline since the last renewal. The school has also failed to meet its enrollment projections for all four (4) years of the current charter and the 2017-2018 enrollment was only 51% of the projected amount. The 9th grade enrollment (highlighted) has shown a 75% drop in the last four (4) years.

Additionally, there has been a high attrition rate of students. For example, the graduating class of 2018 had 46 seniors which is a 29% attrition rate from the 65 ninth graders that were enrolled in 2015.

LAICHS Enrollment by Grade Level

Year	Grade Level				Total	Projected*
	9	10	11	12		
2015	65	71	59	61	256	300
2016	55	50	65	60	230	300
2017	50	55	57	57	219	300
2018	16	44	47	46	153	300

*=Final charter petition for 2014-19 from LAICHS
 Source: CDE Data and Statistics/ Demographics Student & School/Data Files (Downloadable)/Enrollment by School
 retrieved 11-19-18

Racial and Ethnic Balance: The LAICHS student body is underrepresented for the White and Asian population and not *reflective of the general population residing within the territorial jurisdiction of the school district to which the charter petition is submitted*. Additional information on the racial and ethnic balance are presented under **Finding 5** of this report.

The school plans to expand outreach to neighboring areas with higher White and Asian populations.

California Dashboard Local Indicators: According to both the 2017 and 2018 California School Dashboards, all locally-determined indicators are reported as “Standard Not Met” for the last two (2) years for LAICHS. These indicators are:

- Basics: Teachers, Instructional Materials, Facilities
- Parent Engagement
- Local Climate Survey
- Implementation of Academic Standards
- Access to a Broad Course of Study

Governance: The school received a Notice of Noncompliance with the Monitoring and Oversight Memorandum of Understanding (MOU) on April 11, 2016, for lack of Brown Act training, lack of notification of changes in Board membership, and lack of notification of changes in school administration.

The LAICHS Board of Directors currently has six (6) members. The board meets regularly on the school site. A previous version of the bylaws called for a three (3) member quorum with five (5) to seven (7) members possibly sitting on board. Bylaws were amended to require a majority of current members to be considered a quorum.

Additional Indicators of Capacity to Implement:

In addition to considering past performance, 5 CCR 11967.5.1(c) provides four (4) indicators that a petitioner may be unlikely to implement the proposed educational program. Based on a review of the

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

petition, supporting documents, and the Capacity Interview with the school’s leadership team, the Review Team determined that there is evidence that **two (2) of the four (4)** additional indicators exist:

Indicator: *The petitioners are unfamiliar...with the content of the petition or the requirements of law that would apply to the proposed charter school.*

As shown in Elements one (1), four (4) and five (5) below on pages 14-17, the petitioners have shown a lack of familiarity with several items in the petition, including the EL Master Plan, the Parent/Student handbook, and the staff job descriptions. These documents show that there have been no updates to make them compliant with current practices and requirements of law.

At the Capacity Interview, a Board member stated that graduation requirements are “set by the state” and “set in stone.” Board members also said they reviewed the EL Master Plan and the student handbook “yearly.” When asked about SB 359, the Math Placement Act of 2015, it was clear that the Board members were unaware of the requirements of this law, making statements such as that they “adopted state criteria.”

Several areas of the charter have not been updated to reflect current laws or practices, demonstrating the petitioner’s lack of familiarity. For example, the graduation requirements still reference the California High School Exit Exam (CAHSEE), which has not been a requirement since 2014-2015.

Indicator: *In the area of administrative services, the charter or supporting documents do not adequately describe the structure for providing administrative services.*

Fiscal and Operating Policies: The school’s Fiscal Policies and Procedures contains the no major deficiencies.

However, the policy require technical change to the following:

- Credit Cards: The credit card procedure allows for individuals other than the card bearer (CEO) to make purchases on school credit card.
- The title of one position (Office Manager): the current organizational structure does not have this functional title.

Table 3 illustrates a financial overview of the charter school’s ADA, Net Income Projections, Ending Cash Balance, for the five (5) fiscal years of the renewal term.

The positive Ending Cash Balance for fiscal year (FY) 1-5 is contingent upon achieving the school’s targeted enrollment and ADA of **228**.

Table 3 LAICHS Budget Plan Overview					
Budget Plan	FY1 (2019-2020)	FY2 (2020-2021)	FY3 (2021-2022)	FY4 (2022-2023)	FY5 (2023-2024)
Projected Enrollment	172	200	240	240	240
Projected ADA	163.40	190	228	228	228
Net Income Projections	\$41,897	\$226,521	\$524,643	\$561,968	\$520,198
Projected Ending Cash Balance	\$453,155	\$622,854	\$1,108,954	\$1,719,436	\$2,264,595

To be fiscally solvent, the Budget Plan requires that the school (1) meets its enrollment projections; and (2) meets its ADA projections.

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

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

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

Based on the guidance established in *Education Code*, California Code of Regulations, Title 5 (5 CCR), the requirements set forth in the County Board Policy, Superintendent's Administrative Regulations (AR) and other requirements of law, four (4) of the 15 required elements are comprehensive as written, three (3) are reasonably comprehensive with specific deficiencies, and eight (8) are not reasonably comprehensive. The findings of the Review Team are as follows:

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

1. The petition fails to *identify the needs and challenges of the student groups to be served*, such as homeless, foster youth, and Long-Term English Learners (LTELs) *and how the instructional design meets these needs and challenges*.

At the Capacity Interview, the petitioners were asked how they supported LTELs and their response was that they did not think they had any LTELs. According to the CDE, in 2016-2017, over 77% (14 of 18) of their ELs were LTELs and in 2017-2018, 90% (9 of 10) of their ELs were LTELs.

2. The petition does not describe how the collaborative/inclusive model supports SWDs in each of the content areas.
3. The petition does not *describe how the charter school will meet the needs of English Learners* who are identified as special education students. It fails to identify key components of a linguistically appropriate Individualized Education Plan (IEP) for English learners who receive special education services as required by *EC 56345(b)*, nor does it indicate an individual with expertise in second language acquisition who understands how to differentiate between limited English proficiency and a disability will be included on the IEP team for dually identified students.
4. The EL Master Plan does not appear to have changed since the 2014-2015 school year and has not been updated to reflect requirements *enacted into law after the charter was originally granted or last renewed*. (*EC 47607 (a)(1)*). For example:
 - It has multiple references to the CELDT, CASHEE and CST, has no references to the ELPAC, and refers to the 2015-2016 school year in the future tense.
 - It fails to include any specific reference to Integrated and Designated ELD for program placement and core classes as required by CDE.
 - It indicates the use of the *High Point* program for ELD, which is not aligned to either current ELD or Common Core standards.
 - There is no reference to or plan for the support of Long-Term English Learners (LTELs).
5. There is no plan to address the requirements of SB 359, the Math Placement Act of 2015, regarding criteria for placement in math courses for incoming students.
6. The petition lacks a comprehensive description regarding how parents will be informed of the transferability of courses to other public high schools.
7. The petition does not specify the curriculum and instructional materials for the proposed Independent Study program.

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

8. It is not clear how the school determines the availability of services for students not achieving at or above expected levels nor how it ensures that these services are provided to students.

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

1. Many of the MPOs are either not *based on data that can be verified by LACOE* or are not measurable. For example: "100% of students who fall behind on meeting adequate graduation progress will be provided with support" and "Grade level data teams will identify needed interventions and instructional strategies."
2. The petition does not clearly describe the assessments that will be used in classes *to evaluate the effectiveness of and to modify instruction for individual students and groups of students.* [5 CCR § 11967.5.1(f)(2)(A)] The petition states that all content areas administer benchmarks on Illuminate and disaggregate the data with their students but not how the data will be used to modify instruction.
3. The MPOs included in the petition did not include *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, which apply for the grade levels served, and specific annual actions to achieve those goals.* For example, the petition does not contain goals for these state priority items:
 - Percentage of ELs making progress on ELPAC
 - Chronic absenteeism rates
 - Middle school dropout rates
 - Broad course of study for either 6th grade or grades 7-12

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

1. The petition does not include the administration of the California Physical Fitness Test (FITNESSGRAM) for students in 7th and 9th grades.
2. It does not include the administration California Alternative Assessment for eligible special education students.
3. It does not specify the assessment tools used to identify and exit students for English Intervention and Math Intervention.
4. It does not specify what standards aligned benchmarks the students take on Illuminate and how they are used.

Element 4: Governance Structure. *Not reasonably comprehensive*

1. The organizational chart does not include the Curriculum Specialist/EL Coordinator or the Athletic Coordinator that are described in the petition.
2. There is no description of the composition, scope, and purpose of a School Site Council for the school, nor is it included within the school's organizational chart. The proposed budget includes Title I funds; however, the petition fails to describe the School Site Council and its responsibilities in developing, approving, monitoring and evaluating the school's School Plan for Student Achievement (SPSA) and budget.

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

At the Capacity Interview it was stated that the composition changes year-to-year and the SSC gives input on policies such as the uniform policy, graduation requirements, and class offerings. These practices are not consistent with state and federal regulations regarding SSCs.

3. The petition fails to include *evidence that the organizational and technical designs of the governance structure reflect a seriousness of purpose necessary to ensure that the educational program will be successful* due to the fact that:
 - There is evidence that the Board has not reviewed the EL Master Plan in several years.
 - There is evidence that the Board has not reviewed the graduation requirements in the Parent/Student handbook in several years, as the current handbook still indicates passage of the CAHSEE (which ended in 2015) as a requirement.
 - There is no evidence that the Board has yet created a policy that addresses the requirements of SB 359, The Math Placement Act of 2015.

Element 5: Employee Qualifications. *Not reasonably comprehensive*

1. The organization chart included in the submission does not correctly *describe reporting structures* for LAICHS. Several positions are not represented or incorrectly named. Some positions were missing job descriptions. There was a lack of clarity as to who was responsible for supervising and evaluating teachers.
2. The petition does not *identify those positions that the charter school regards as key in each category and specify the additional qualifications expected of individuals assigned to those positions*. For example:
 - There is no reference to EL authorizations such as CLAD/BCLAD for teaching staff, nor specific qualifications or credentials for Special Education teachers.
 - Qualifications listed for Operations Coordinator and Athletic Coordinator do not align with their duties. For example the Operations Coordinator requires Sports Knowledge and California Interscholastic Federation (CIF) experience and the Athletic Coordinator job description does not list required qualifications or experience.

Element 6: Health and Safety Procedures. *Reasonably comprehensive with specific deficiencies*

1. The petition does not have a plan *to provide for the screening of pupils' vision and hearing and the screening of pupils for scoliosis* for the proposed middle school grades.
2. Several policies referenced in the petition are not included in the student/parent or employee handbooks such as "policies relating to preventing contact with blood-borne pathogens," "a policy that the school location and facility will be investigated, inspected, and tested in order to determine that it is free from environmental hazards" and "a policy establishing that the school functions as a drug-, alcohol-, and tobacco-free workplace."
3. The school does not include procedures by which *on a yearly basis, a concussion and head injury information sheet shall be signed and returned by the athlete and the athlete's parent or guardian before the athlete initiates practice or competition*, as required by EC 49475(a)(2)

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

Element 7: Means to Achieve a Reflective Racial and Ethnic Balance. *Reasonably comprehensive with specific deficiencies*

The benchmarks of increasing enrollment of White and Asian/Pacific Islander by “1% per each group within the next 5 years” do not adequately address the 33.8% disparity in the demographics of the school compared with the territory covered by the district (LAUSD) or the 23.5% disparity for the zip code (90042) wherein LAICHS resides.

Demographic Composition				
Demographic Categories	%General Population within Geographic Boundaries of*		2017-18 LAUSD Enrollment**	2017-18 LAICHS Enrollment**
	LAUSD	Zip Code 90042		
Hispanic or Latino	51.9	70.0	74.1	88.2
White	25.7	14.0	10.1	2.6
Black or African American	9.4	2.1	8.1	2.6
American Indian and Alaska Native	0.2	0.3	0.2	2.0
Asian	10.5	12.0	3.7	—
Filipino	—	—	0.3	2.0
Native Hawaiian and Other Pacific Islander	0.2	0.1	1.9	—
Some Other Race Alone	0.3	0.2	—	—
Two or More Races	1.9	1.4	1.3	1.3
Not Reported	—	—	0.3	1.3
*—= no data available *Source: 2010 Census retrieved 11-29-16 from http://factfinder.census.gov/ for LAUSD, 12-13-18 for 90042 **Source: CDE Data and Statistics/ Demographics Student & School/Data Files (Downloadable)/Enrollment by School http://www.cde.ca.gov/ds/sd/sd/filesenr.asp retrieved 4-17-18				

The petition states that “in order to increase enrollment in the key demographic groups” the school will “introduce our enrollment best practices into neighborhoods with traditionally higher percentage of White, Asian and African American residents” that are not near to the proximity of the school.

Element 8: Admission Requirements. *Reasonably comprehensive with specific deficiencies*

The petition is in conflict with EC 47605(n) which states that *parental involvement is not a requirement for acceptance to, or continued enrollment at, the charter school since it calls for the forfeiture of enrollment if a family:*

- Fails to attend the Enrollment Tour/meeting
- Fails to complete all documents

Element 9: Annual Independent Financial Audits. *Not reasonably comprehensive*

1. The petition does not *specify who is responsible for contracting and overseeing the independent audit.* It says LAI is responsible for hiring, and the Executive Director is responsible for reviewing and reporting any exceptions or deficiencies to the Board.
2. The petition fails to provide *the timeline in which audit exceptions will typically be addressed.*
3. The petition does not explicitly state that *the auditor shall be hired by the Board of Directors of the charter school* as required under LACOE AR 0420.4(h).

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

Element 10: Suspension and Expulsion Procedures. *Not reasonably comprehensive*

1. The petition states that “the expulsion of a student will be at the discretion of the LAI Board of Directors or his/her designee” and that “the students have the opportunity to appeal to the LAI Board of Directors or their designees” which creates a potential conflict of interest.
2. There is no mention of a plan for *how detailed policies and procedures regarding suspension and expulsion will be developed and periodically reviewed* as required in 5 CCR § 11967.5.1 (f)(10)(E).
3. Parent/Student handbook indicates a “No Tolerance Policy” that is not aligned with the due process procedures in the petition.
4. Parent/Student handbook allows for expulsion after 12 tardies. Expulsion based solely on 12 tardies is not a positive practice and does not offer any means to make correction.

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

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

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

Element 14: Dispute Resolution Procedures. *Reasonably comprehensive*

Element 15: Closure Procedures. *Not Reasonably comprehensive*

1. The petition does not state specify that *a list of pupils in each grade level and the classes they have completed, together with information on the pupils' district of residence, to the responsible entity to conduct closure-related activities.*
2. The petition does not specify how the *transfer and maintenance of personnel records* would take place *in accordance with applicable law.*
3. The petition does not specify the source of the funds to be used for closure activities.

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

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

Employment is Voluntary. [EC 47605(e)] *Not Applicable; not a conversion charter*

Pupil Attendance is Voluntary. [EC 47605(f)] *Not Applicable; not a conversion charter*

Effect on the Authorizer and Financial Projections. [EC 47605(g)] *Provides the necessary evidence*

Preference to Academically Low Performing Students. [EC 47605(h)] *Qualifies*

Teacher Credentialing Requirement. [EC 47605(l)] *Does not meet the condition*

The petition does not meet the requirement that *teachers in charter schools shall be required to hold a CCTC certificate, permit, or other document equivalent to that which a teacher in other public schools*

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

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. For example:

- Teacher qualifications do not indicate a need for CLAD/BCLAD or other EL authorization
- Qualifications or types of credential necessary for Special Education teachers are not described

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

Appendix 1

Los Angeles County Office of Education Standard of Review

Review Criteria: The Los Angeles County Office of Education (LACOE) Charter School Review Team (Review Team) considered the petition according to the requirements of the *Education Code* and other pertinent laws, guidance established in the *California Code of Regulations, Title 5*, County Board Policy and Superintendent's Administrative Regulations.⁴

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

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

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

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

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

- Adjustments necessary to reflect the County Board as the authorizer. These adjustments are necessary because the petition was initially submitted to a local district and contains specific references to and/or language required by that district and/or the petition does not reflect the structure of the County Office.
- Adjustments needed to bring the petition current with changes made to law since the petition was submitted to the district as required by statute.

⁴ Words in italics indicate a direct reference to the language in these documents.

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

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

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

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

Scope of Review: Findings are based on a review of the same petition and supporting documents considered by the local district, information obtained through the Capacity Interview and other communications with the petitioner and representatives of the school, and other publicly available information.

Legislative Intent

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

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

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

Additional Review Criteria Specific to a Renewal Petition

The appeal of a charter not renewed at the district level is additionally governed by EC 47607 and 47605 and 5 CCR 11966.5, which provide the requirements for the submission of an appeal to a county board of education and the grounds for denial.

EC 47607(a)(2) states that renewals *are governed by the standards and criteria in section 47605 (the requirements to establish a charter), and shall include, but not be limited to, a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed.*

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

The Review Team determined whether each required element complies with current legal requirements and whether the petitioners demonstrated they are familiar with current legal requirements through the Capacity Interview. If the petition did not comply or the petitioners were unfamiliar with current law, the Review Team noted the deficiency through the applicable Finding.

EC 47607(a)(3)(A) states that *the authority that granted the charter shall consider increases in pupil academic achievement for all groups of pupils served by the charter school as the most important factor in determining whether to grant a charter renewal.* (Emphasis added)

This consideration applies to the authorizing entity. This requirement is **not** referenced or specified in Regulations (5 CCR 11966.5(c)(1-2)) that apply to a county board's consideration of the appeal of a renewal petition.

5 CCR 11966.5(b) provides the timelines, process and requirements for reviewing a renewal petition.

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

Appendix 2
Measureable Pupil Outcomes (MPOs)

Progress Towards Meeting the Measurable Pupil Outcomes in Current Charter

Measureable Outcomes	School Reported Performance Measures		Outcome Met
1. 100% of students and teachers will have access to CCSS-aligned material, additional instructional resources and materials.	Year	School Reported Performance Measure	NO (2 of 4 met)
	2015	YES- Teacher surveys and Unit Plans	
	2016	YES- SARC	
	2017	Not reported by school	
	2018	Not reported by school	
2. Grade level data teams will identify needed interventions and instructional strategies.	Year	School Reported Performance Measure	NO (1 of 4 met)
	2015	YES- Teachers given Benchmark Data Results and created Benchmark Corrective Action Plans	
	2016	Not reported by school	
	2017	Not reported by school	
	2018	Not reported by school	
3. 95% ADA rate with no greater than 2% variance	Year	Attendance Rate- CDE	NO (1 of 4 met)
	2015	94.5%	
	2016	95.2%	
	2017	91.3%	
	2018	91.0%	
4. Dropout rate of no more than 2%	Year	From SARC	NO (1 of 4 met)
	2015	1.8%	
	2016	5.1%	
	2017	Not reported by school	
	2018	Not reported by school	
5. 98% Graduation rate with no more than 2% variance	Year	California Dashboard (4 yr cohort)	NO (0 of 4 met)
	2015	96.5%	
	2016	91.5%	
	2017	77.3%	
	2018	90%	
6. 100% of students who fall behind on meeting adequate graduation progress will be provided with support.	Year	School Reported Performance Measure	NO (0 of 4 met)
	2015	Not reported by school	
	2016	Not reported by school	
	2017	Not reported by school	
	2018	Not reported by school	
7. Decrease the number of students scoring Below Basic and Far Below Basic by 5%. Baseline 56%.	Year	SBAC % nearly met/not met	NO (Reduced ELA nearly met/not met between 2017 and 2018 by 7% but not for math and not in ELA for other years.)
	2015	ELA- 22% Math- 66%	
	2016	ELA- 48% Math- 88%	
	2017	ELA- 59% Math- 92%	
	2018	ELA- 52% Math- 91.5%	

Los Angeles County Board of Education
Confirmation Letter Dated January 24, 2019;
January 22, 2019, Meeting Minutes;
Staff Findings; and Petitioner's Response

accs-apr19item05
Attachment 6
Page 32 of 45

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

Measureable Outcomes	School Reported Performance Measures		Outcome Met
8. Students will have access to SBAC-aligned benchmarks	Year	School Reported Performance Measure	NO (1 of 4 met)
	2015	YES- Online OARS exams	
	2016	Not reported by school	
	2017	Not reported by school	
	2018	Not reported by school	
9. Exceed the API target growth. Baseline target of 5.	Year	CST	N/A
	2015	N/A	
	2016	N/A	
	2017	N/A	
	2018	N/A	
10. All students will satisfy UC/CSU A-G requirements.	Year	School Reported Performance Measure	YES
	2015	YES- Transcript reviews by counselors	
	2016	YES- SARC	
	2017	YES- SARC	
	2018	YES- SARC	
11. All students will identify career and major they wish to pursue.	Year	School Reported Performance Measure	NO (1 of 4 met)
	2015	YES- Via College Prep elective course	
	2016	Not reported by school	
	2017	Not reported by school	
	2018	Not reported by school	
12. EL students will be successful in English as measured by grades and teacher progress evaluation reports.	Year	School Reported Performance Measure	NO (0 of 4 met)
	2015	Not reported by school	
	2016	Not reported by school	
	2017	Not reported by school	
	2018	Not reported by school	
13. 20% of the EL students will be reclassified every year. 80% of the EL students will reclassify by their graduation	Year	Reclassification rate- CDE	NO (1 of 4 met)
	2015	0%	
	2016	18.2%	
	2017	30%	
	2018	0%	
14. Students passing AP exam (3+) will increase by 10% annually. Baseline 13-14: 3.7% (1 of 27)	Year	AP Students passing rate	NO (0 of 4 met)
	2015	1.9% / 13.7%	
	2016	17.5% / 23.7%	
	2017	0% / 33.7%	
	2018	30% / 43.7%	
15. Annually increase an additional 5% of students identified as college ready. Baseline EAP 33%	Year	School Reported Performance Measure	NO (0 of 4 met) (2015 used EAP. Starting in 2016 used SBAC 'Exceeded')
	2015	ELA- 31% / 38% Math- 38% / 38%	
	2016	ELA- 13% / 43% Math- 0% / 43%	
	2017	ELA- 8% / 48% Math- 0% / 48%	
	2018	ELA- 11% / 53% Math- 0% / 53%	
16. Maintain an annual suspension rate of less than 3%.	Year	SARC	NO (1 of 4 met)
	2015	0%	

Staff Findings on the Renewal Petition for Los Angeles International Charter High School

Measureable Outcomes	School Reported Performance Measures		Outcome Met
	2016	3.7%	
	2017	3.5%	
	2018	9.4%	
17. Maintain an annual expulsion rate of less than 3%.	Year	SARC	YES
	2015	0%	
	2016	0%	
	2017	0%	
	2018	0%	
18. 100% of core-content teachers will hold a valid California teaching credential.	Year	SARC	NO (3 of 4 met) (2018 had one missassignment according to SARC)
	2015	100%	
	2016	100%	
	2017	100%	
	2018	91%	
19. Facility will pass annual inspection.	Year	SARC	Yes (2018 Report not yet available)
	2015	Exemplary	
	2016	Good	
	2017	Good	
	2018	Not Available	
20. Increase by 10% on parent participation for parent conferences. Baseline 67% fall semester conferences, 10% for one on one conferences	Year	School Reported Performance Measure	NO (0 of 4 met)
	2015	Not reported by school	
	2016	Not reported by school	
	2017	Not reported by school	
	2018	Not reported by school	
21. Parent participation on Board of Directors.	Year	School Annual Report	NO (3 of 4 met)
	2015	None reported by school	
	2016	YES	
	2017	YES	
	2018	YES	

Los Angeles International Charter School



RESPONSE TO THE FINDINGS ADOPTED BY THE LOS ANGELES COUNTY BOARD OF EDUCATION IN SUPPORT OF DENIAL OF CHARTER RENEWAL

This response tracks the format of the "Staff Findings on the Renewal Petition for Los Angeles International Charter School" adopted by the Los Angeles County Board of Education ("County Board") on January 22, 2019.

Los Angeles International Charter School ("LAI") is a WASC-accredited, small learning community with high academic expectations in Northeastern Los Angeles. LAI first opened its doors in 2005 and the County Board has approved the school's charter renewal petition twice since the original charter term (in 2009 and 2014). Our 14+ years of operating have not always been easy, however. The 2016-17 school year was extremely difficult for LAI. The school's founder and former Executive Director left on bad terms before the school year started, as did a large chunk of our classified and teaching staff. Our current Executive Director was hired in August 2016 and had only one week to find and place suitable staff members before the school year kicked off. A few months into the year, our math teacher resigned for personal reasons and, due to a lack of high quality teachers looking for positions in our community, it took months to find a suitable replacement. And then tragically, a student at LAI passed away after a horrific traffic accident near the school in December of 2016. Some of our students even witnessed it. Our entire community grieved for months, which really took an emotional toll on everyone. Needless to say, LAI essentially had to restart from square one during and after that year. It took a lot of time, energy, and effort, but we've persevered. We're proud of where we've come and where we're going.

As explained below, LAI qualifies for renewal and the "findings" adopted by the County Board are not supported by the facts. Petitioners have refuted or explained each and every negative finding herein, and we look forward to the opportunity to discuss any lingering issues with the California Department of Education ("CDE") and the State Board of Education ("State Board").

Finding #1: *The County Board found that LAI has not met the academic performance criterion under Education Code section 47607(b)(4) necessary to be considered for renewal. However, the County Board **failed to correctly apply** the old criterion under section 47607(b)(4), and completely overlooked the new criterion under Education Code section 52052(f).*

LAI's Response:

The Charter Schools Act expressly encourages the renewal of a charter as long as the school meets at least one of the minimum academic achievement renewal criteria. The old criteria, four of which don't apply to LAI, can be found under Education Code section 47607(b). However, as a result of the California Legislature abandoning API in favor of a new multi-measure accountability system, the Legislature provided a new charter renewal criterion in Education Code section 52052(f):

“For purposes of paragraphs (1) to (3), inclusive, of subdivision (b) of Section 47607, *alternative measures that show increases in pupil academic achievement* for all groups of pupils schoolwide and among numerically significant pupil subgroups *shall be used*.”

The County Board completely overlooked this new criterion in the findings. Despite the unfortunate setbacks explained above, LAI has persevered and experienced increases in pupil academic achievement and, thus, qualifies for renewal:

- ✓ The percentage of students schoolwide who Met or Exceeded Standards on the CAASPP in ELA/ Literacy *increased* in 2018.
- ✓ The percentage of students schoolwide who Met or Exceeded Standards on the CAASPP in Math *increased* in 2018.
- ✓ The percentage of Hispanic or Latino students who Met or Exceeded Standards on the CAASPP in ELA/ Literacy *increased* in 2018.
- ✓ The percentage of Hispanic or Latino students who Met or Exceeded Standards on the CAASPP in Math *increased* slightly in 2018.
- ✓ The percentage of Socioeconomically Disadvantaged students who Met or Exceeded Standards on the CAASPP in ELA/ Literacy *increased* in 2018.
- ✓ The percentage of Socioeconomically Disadvantaged students who Met or Exceeded Standards on the CAASPP in Math *increased* in 2018.
- ✓ The percentage of LAI students taking and passing AP exams *increased* in 2018; 30%.
- ✓ LAI's graduation rate *increased* in 2018 and 36 of the 38 qualifying seniors were accepted to a four-year university.
- ✓ The percentage of graduating seniors who were accepted into a four year college/university *increased* in 2018. Our students have attended U.C. Berkeley, U.C.L.A., U.C. Davis, New York University, San Diego State University, and many others.
- ✓ The number of Honors and AP courses offered at LAI, the number of students taking an AP exam, and the percentage of students who passed an AP exam increased in 2018.
- ✓ The Golden State Seal Merit Diploma has criteria of 3 or better on CAASPP **OR** passage of math class with a B or better. 24 of the 38 seniors passed their Honors and Math 3 classes with a B or better, with none of them failing.

Since increases in academic achievement at a charter school shall be the most important factor in a charter renewal (Ed. Code, § 47607(a)(3)), LAI does qualify for renewal.

The only *old* criterion that applies to LAI is under Education Code section 47607(b)(4), which the County Board cites to in the findings but misapplies. 47607(b)(4) requires that:

“The entity that granted the charter determines that the academic performance of the charter school is at least equal to the academic performance of *the public schools that the charter school pupils would*

otherwise have been required to attend, as well as the academic performance of the schools in the school district in which the charter school is located, considering the composition of the pupil population that is served at the charter school.”

In other words, the County was required to compare LAI to the students’ resident schools and schools within the Los Angeles Unified School District (“LAUSD”) with similar student populations. The County Board failed to engage in the correct analysis. Both lists of comparable schools were chosen by the County, and the County instructed LAI to use them in the charter renewal despite objections that the lists are fundamentally flawed. For example, the list of “Resident Schools” on page 6 of the findings includes the high performing Alhambra High School, which is not a resident school of LAI students. The list of “Comparison Schools” on page 7 includes two schools that serve different grade levels than LAI, and includes two charter schools that are independent of LAUSD. The result of the County Board’s failure is an analysis that unfairly skews the data in favor of denial—the County’s ultimate decision and, likely, their desired result.

With the correct comparison schools, LAI’s increases in pupil performance is even more apparent. The following charts depict that performance. These charts are not contained in the renewal petition because we were directed by LACOE staff to not use these schools. We now realize that instruction was nefarious and likely intended to thwart the LACOE Board from approving the renewal. The charts are presented here to highlight LACOE’s failure to appropriately process the renewal.

**Academic Performance of Charter and Resident Schools
 2018 California Assessment of Student Performance and Progress (CAASPP)**

School (Grade)	Grade Levels	% Charter School's Enrollment	ELA (% Met or Exceeded)									Math (% Met or Exceeded)							
			All	SED	AA	Hisp	SWD	EL	FY	HY	All	SED	AA	Hisp	SWD	EL	FY	HY	
Los Angeles International Charter School	9-12	30	48.9	50	---	47.7	---	---	---	---	8.5	9.38	---	6.82	---	---	---	---	
Manual Arts Senior High School	9-12	26	32.45	38.64	---	37	---	0	---	---	9.8	9.2	---	10.12	---	0	---	---	
Belmont Senior High School	9-12	23	37.4	36.5	---	35.7	16.7	3.9	---	---	13.6	12.7	---	11.3	16.7	0	---	---	
Benjamin Franklin High School	9-12	20	50	51.2	---	49	18.2	7.7	---	---	29.1	29.8	---	27.6	6.25	0	---	---	
Woodrow Wilson High School	9-12	21	43	44	---	41.3	19.6	---	---	---	15.9	16.4	---	13	0	---	---	---	
Sotomayor High School	9-12	23	55.1	53.2	---	55.3	---	---	---	---	0	4	---	0	---	---	---	---	

*--- no data was provided, AA=African American, Hisp=Hispanic, EL=English Learner, SED=Socioeconomically Disadvantaged, SWD=Students with Disabilities, FY=Foster Youth, HY=Homeless Youth
 Source: DataQuest, caaspp.cde.ca.gov

**Academic Performance of Charter and Similar Comparison Schools
 2018 California Assessment of Student Performance and Progress (CAASPP)**

School (Grade)	Grade Levels	ELA (% Met or Exceeded)									Math (% Met or Exceeded)							
		All	SED	AA	Hisp	SWD	EL	FY	HY	All	SED	AA	Hisp	SWD	EL	FY	HY	
Los Angeles International Charter School	9-12	48.9	50	---	47.7	---	---	---	---	8.5	9.38	---	6.82	---	---	---	---	
Theodore Roosevelt Senior High School	9-12	50	51	---	50	10	8.16	---	---	8.7	8.88	---	8.88	0	4.08	---	---	
Sylmar Biotech Health Academy	9-12	25.45	24.53	---	26.92	---	---	---	---	10.9	9.4	---	11.54	0	---	---	---	
Boyle Heights STEM High School	9-12	25	21.8	---	25	---	---	---	---	5.56	---	---	5.56	---	---	---	---	
Discovery Charter Preparatory High School	9-12	30.51	30.61	---	29.84	14	---	---	---	11.86	12	---	12.24	---	---	---	---	
School of Global Studies	9-12	20.26	18.67	---	20.27	---	0	---	---	5.13	5.4	---	2.74	---	---	---	---	

*--- no data was provided, AA=African American, Hisp=Hispanic, EL=English Learner, SED=Socioeconomically Disadvantaged, SWD=Students with Disabilities, FY=Foster Youth, HY=Homeless Youth
 Source: DataQuest, caaspp.cde.ca.gov

GRADUATION RATE

Los Angeles International Charter HS	Graduation Rate	2016-17	77.3%	2017-18	95%
Manual Arts High School	Graduation Rate	2016-17	82%	2017-18	74%
Belmont Senior High School	Graduation Rate	2016-17	68%	2017-18	61%
Benjamin Franklin High School	Graduation Rate	2016-17	84.8%	2017-18	86.4%
Woodrow Wilson	Graduation Rate	2016-17	83.7%	2017-18	82.5%
Sotomayor High School	Graduation Rate	2016-17	86.8%	2017-18	77.8%
Benjamin Franklin High School	Graduation Rate	2016-17	84.8%	2017-18	86.4%
Theodore Roosevelt High School	Graduation Rate	2016-17	78.4%	2017-18	71.9%
Sylmar Biotech Health Academy	Graduation Rate	2016-17	93.1%	2017-18	96.9%
Boyle Heights STEM High School	Graduation Rate	2016-17	100%	2017-18	82.7%
Discovery Charter Prep High School	Graduation Rate	2016-17	87.3%	2017-18	87.5%
School of Global Studies High School	Graduation Rate	2016-17	78.4%	2017-18	68.2%

Finding #2: *The County Board improperly found that the charter renewal petition provides an unsound educational program, despite almost 14 years of operating in Northeast Los Angeles and two previous charter renewals approved by the County Board. (Ed. Code, § 47605(b)(1).)*

LAI's Response:

The State Board has promulgated regulations establishing criteria for evaluating a charter under 5 C.C.R. section 11967.5.1, and an “unsound educational program” is narrowly defined. The County Board’s findings cite to the regulations but fail to correctly apply them. Below, we address each of the three “indicators” discussed by the County Board under Finding #1.

First, an “unsound educational program” is as one that is likely to cause physical, educational, or psychological harm to the pupils who attend the charter school. (5 C.C.R. § 11967.5.1(b)(1).) Here, the County Board’s findings contain conclusory statements about LAI’s suspension rate and one statement in our Student and Parent Handbook about expulsion, and then randomly leap to the conclusion that the proposed educational program may present harm to students. This leap is unfair and unsupported. As we’ve shared with the County, LAI received many transfer students over the past two years who were removed from their previous schools for disciplinary reasons. These students often came to LAI with the same behavioral problems that led to issues in their past. LAI has a zero tolerance policy against drugs and violent behavior to protect our students, but suspension and expulsion is always a last resort. We utilize other discipline methods first, such as one-on-one meetings with the student and staff to address behavior and develop a behavior agreement, a Discipline Matrix, non-verbal cues, loss of privileges, group counseling activities, SST meetings, family meetings and counseling, and others. LAI is wholeheartedly committed to improving school climate in our community but it’s simply wrong to say that our educational program is harmful to students.

Second, an “unsound educational program” is one that is not likely to be of educational benefit to the pupils who attend. (5 C.C.R. § 11967.5.1(b)(2).) Here, the County Board uses the same flawed lists of “Resident Schools” and “Comparison Schools” to paint LAI in a negative light in terms of academic achievement. The analysis is simply unfair. Students at LAI receive tremendous academic benefits from our program. For example, in the 2017-18 school year: LAI’s graduation rate increased to 95%; 98% of graduating seniors were accepted to a 4-year college/university; the percentage of students who Met or Exceeded standards on the CAASPP in ELA/ Literacy and Math increased, both schoolwide and among LAI’s numerically significant student groups; the number of students who took an AP exam increased; the percentage of students with a score of 3 or better on an AP exam increased; the number of AP courses offered to students increased; and access to technology for students increased with a 1:1 ratio of students to computers and a new computer lab to support the newly designed Graphic Designs, Animation and CTE Business Courses. LAI purchased a cutter, shirt press and

heat press for the LAI BULLDOGS student shirt company. This gives greater access and exposure to college and career readiness.

The County Board also uses LAI's "outdated" EL Master Plan, reclassification rate, and a misquoted statement from the County's capacity interview as support that our EL program is not likely to be of educational benefit. We would have been happy to fix typos in the EL Master Plan to sync with the updated descriptions of our EL program in the charter renewal petition, but the County didn't give us the chance. LAI supports EL students, including LTEL students, in a variety of ways, such as using differentiated instruction, scaffolding, graphic organizers, and modeling and visuals. LAI has a certificated ELL Coordinator who works with students daily, either individually or in groups depending on students' needs. And as discussed at the capacity interview, every EL student receives at least 20 minutes per week of designated, pull-out EL instruction that is standards-aligned. Students who have been reclassified are monitored for 2 additional years. (Charter, p. 42.) LAI is a small school with only ten EL students in 2017-18. LAI didn't receive a score on the "English Learner Progress" indicator of the California School Dashboard last year because of our small EL population. We are working tirelessly to improve our reclassification rate, but a small EL population can lead to volatile swings in reclassification rates.

Finally, a charter has an "unsound educational program" if the school had not met any of the academic renewal criteria or has not met the measurable pupil outcomes ("MPOs") in the charter. (5 C.C.R. § 11967.5.1(b)(3).) Here, the County Board's conclusion is wrong because, as explained above, the County Board overlooked the new academic criterion under Education Code section 52052(f). LAI has, in fact, met the academic renewal criteria and qualifies for renewal. As for the MPOs listed in Appendix 2 to the findings, a cursory review of the data shows that the County's analysis is flawed. For example, the County concludes that LAI didn't meet at least nine of the MPOs simply because the County didn't have the data. It's fundamentally unfair and illogical to form a conclusion without the data.

Finding #3: *The County Board improperly found that petitioners are unlikely to successfully implement the educational program, despite the undeniable increases in student academic achievement over the past two years. (Ed. Code, § 47605(b)(2).)*

LAI's Response:

Whether a petitioner is "demonstrably unlikely to successfully implement the program" is about a charter operator's capacity to run a successful school: whether the operator has a history of charters that have been revoked, whether the operator is unfamiliar with the charter or charter law, whether the operator's financial and operational plan is realistically able to be implemented, and whether the operators have an adequate educational background. (5 C.C.R. § 11967.5.1(c).)

Here, lead petitioner Angie R. Sims has been an educator for over 20 years, many in California public schools. She has experience in both teaching and administration and holds an Administrative Services Credential, a Single Subject Teaching Credential, and Master of Business Administration degree. She has been working with charter schools for over 13 years, including leading LAI as the Executive Director for two years, so she is very familiar with legal requirements applicable to charter schools and is very familiar with the charter. She was asked to come to LAI two years ago to improve the academic program and align it with the mission of the school; and in two years, the course offerings have grown to 11 new electives and 5 additional AP and Honors courses. The LAI governing board is currently comprised of qualified individuals with relevant background and experience in teaching, law, health, business management, and other valuable areas. LAI has never had a charter revoked. On the contrary, the County Board has approved LAI's charter renewal petition twice over the years. We worked with Charter Impact to develop our budget projections, which are sound and based on years of LAI's operations. There is simply no valid basis for the County Board to conclude that petitioners will be unsuccessful at implementing the program—we've had already been doing it for years and improving in innovative ways.

Academics

It's unfair to downplay our recent successes on state testing. LAI essentially hit the reset button two years ago; but has since experienced an increase in the percentage of students who Met or Exceeded Standards on the CAASPP in ELA/ Literacy and Math.

While we recognize there is room for improvement on the "College/Career" indicator of the California School Dashboard, we are proud that in the 2017-18 school year, 95% of seniors at LAI graduated and 98% of graduating seniors were accepted to a 4-year college/university. LAI has also increased the number of AP courses offered to students, the number of students taking AP courses, and the percentage of students passing an AP exam. We are also proud that LAI is the only school in the community with a fully functioning, student-run business on campus.

Part of the WASC accreditation process is a top-to-bottom review of the school's educational program. Every school receives a report at the end of the process with areas of strength and areas noted for growth. We are taking the WASC suggestions listed in the findings seriously and will continue refining our program, but the important fact is that LAI is a WASC-accredited school.

Finances

We are proud to see the County Board acknowledge our clean audit reports and strong financial position year-after-year in the findings. LAI's net assets at the end of the 2017-18 school year was almost \$1 million, which is impressive for such a small school.

Operations

We recognize that enrollment has been trending downward recently, but the County Board was required to consider our future plans for improvement, too. (5 C.C.R. § 11966.6(c)(1).) We've had some problems over the years as explained above but we are moving past them. We are confident that the recent changes LAI has implemented to bolster our educational program, such as our school-wide test prep program for college prep courses, additional math and reading intervention courses, the Illuminate testing system, student-teacher data reviews, after-school tutoring and workshops, new business and entrepreneurship classes, additional laptops and computers, and many others described throughout the charter, will continue leading to results and attract new families to our school. We've also implemented several new marketing strategies, and with the addition of the middle school grades, we are confident that attrition and enrollment will improve.

The law doesn't require that a charter school's racial and ethnic balance perfectly match the local school district. Since affirmative action is illegal, a charter school's inability to achieve a specific racial and ethnic balance cannot be a valid reason for denial of a charter renewal. Achieving a racial and ethnical balance reflective of the local district is a goal, not a mandate. (See, *e.g.*, Ed. Code, § 47605(d)(2)(A).)

It was an oversight to not report our success on the local indicators to the California School Dashboard, as we were understaff and going through a tumultuous time. But we understand how the process works and are committed to ensuring that doesn't happen again.

A minor "Notice of Noncompliance" with the County's MOU, which is not part of the LAI charter petition, is not a valid basis for denying a charter renewal. The issues occurred almost three years ago and have since been remedied.

Additional Indicators of Capacity to Implement

This section of the findings is riddled with nit-picky statements that don't support denial of a charter renewal and shouldn't be the reason to close a school that's been around since 2005. For example, the typos in the EL Master Plan, charter, and Fiscal and Operating Policies can be easily and quickly updated to reflect our current practices and any requirements of law. If the State Board requests it, we are happy to make those changes via conditional approval and technical amendment.

As for the capacity interview, the fact that LAI's volunteer board members could not recite on cue the specifics of the EL Master Plan, the Student and Parent Handbook, and a California senate bill from 2015 doesn't mean that LAI's leaders are unfamiliar with the charter or the requirements of law. That statement is misleading and false, as the board members simply asked to refer to their document in effort to give accurate and precise information.

Our budget projections were prepared by Charter Impact, a very reputable back office services provider for charter schools in California and are based on years of LAI operations. Of course our budget projections depend on our enrollment and ADA estimates; that's how the budget process works. Again, we're confident that with the recent changes to our program and operations, and the additional changes we have planned for the near future, LAI will attract more families and we will meet the estimates in our budget. LAI has family enrollment interest and the support of the community to expand to meet the needs of having a middle school in this community. Currently there are no middle schools in the community which drive families to place students in high schools where there are neighboring middle schools for convenience. The expansion will not only drive enrollment but will support the needs of the community.

Finding #4: *The County Board correctly found that the LAI charter renewal petition does contain an affirmation of all required assurances. (Ed. Code, § 47605(b)(4).)*

This is a clear cut legal standard that our charter meets. As shown on pages 1 and 2 of the charter, and other various places throughout the charter, LAI has affirmed that it will comply with each and every condition required by law.

Finding #5: *The County Board improperly found that the LAI charter renewal petition does not contain a reasonably comprehensive description of all required elements. (Ed. Code, § 47605(b)(5).)*

Under 5 C.C.R. section 11967.5.1(f), the State Board describes what it means for a charter to be "reasonably comprehensive," and the 120+ page LAI charter goes above and beyond what is required by law. This "finding" is especially unreasonable considering the fact that LAI has operated under a very similar renewal charter for many years—one that has been approved by the County Board twice in the past. In fact, the 2019 version currently on appeal to the State Board has even more detail than the 2014 version. What it means to be "reasonably comprehensive" is unfortunately a moving target that doesn't apply fairly to all schools across the board and is not tethered to the actual legal requirements. Many of the "findings" are simply opinions of what the County believes should be part of a charter petition, as opposed to what is actually required by law.

- ***Element 1.*** The County Board found the LAI charter renewal petition doesn't provide a reasonably comprehensive description of the educational program because the charter: (1) doesn't specifically address services for homeless and foster youth and LTELs; (2) doesn't describe how the inclusion model supports students with disabilities; (3) doesn't address legal requirements for serving EL students who also have disabilities; (4) the EL Master Plan hasn't been updated; (5) doesn't address SB 359 regarding math placements; (6) lacks a description of how parents will be informed of the transferability of courses; (7)

doesn't specify the curriculum and instructional materials for independent study; and (8) doesn't address services for low performing and high performing students.

LAI's Response.

LAI holds high expectations for our students, and we implement an array of programs to ensure all students, including homeless and foster youth, those achieving below or above grade level, EL students, and students with disabilities are supported and have opportunity to succeed, and this is in fact stated in the petition. Services for homeless and foster youth and LTELs are not specifically addressed in the charter because our enrollment numbers in those categories are usually very low. Nonetheless, as stated all elements of our educational program are designed to both close the achievement gap in standardized test scores and to develop the students' skills and confidence to succeed in college and beyond. As described in various places in the charter, all students receive a combination of differentiated instruction, small learning communities, college preparatory courses, access to technology, tutoring, and additional interventions as needed. All of these techniques are offered to families completely free of charge and are utilized to bring a struggling student back to grade-level proficiency.

As explained on page 36 of the charter, students with disabilities are fully included within the general education classroom with supports, services, accommodations, and modifications as necessary based on individual student needs. If, in the event it is determined by the IEP team that the most appropriate and least restrictive environment for the student is a setting other than full inclusion within the general education classroom, LAI will collaborate with the SELPA to find an appropriate placement. And of course, students with disabilities are also welcome to take part in the various other supports and services available to all students at LAI.

LAI unequivocally affirms on page 30 of the charter renewal petition that it will comply with all applicable state and federal laws for serving students with disabilities, which includes Education Code section 56345(b) and the laws for IEP team members. The law doesn't require that a charter recite verbatim every single applicable statute on the books. If that were the case, every charter in California would be hundreds if not thousands of pages long.

The EL Master Plan can be updated quickly and easily, and we are happy to do it.

We understand the importance of SB 359 regarding math placements for incoming 9th grade students, and we are happy to develop a policy that meets the legal requirements.

As explained on page 25 of the charter, parents are notified of the transferability of high school course credit by the administration during the enrollment process.

We would've been happy to provide the County with a sample of the independent student curriculum and materials we intend to use, but they never asked for it. We will gladly provide it to the CDE upon request.

- ***Element 2.*** The County Board found the LAI charter renewal petition doesn't provide a reasonably comprehensive description of MPOs because: (1) the MPOs are not based on data that can be verified by the County or are not measurable; (2) the charter doesn't describe how data will be used to modify instruction; and (3) the MPOs in the charter cover every single data point in the state priorities.

LAI's Response.

It appears the definition of "reasonably comprehensive" is a moving target even within the County itself. For example, the two problematic MPOs identified in the findings were also in LAI's 2014 charter renewal

petition that was approved by the County Board. We would have been happy to sit down with the County and discuss their views on effective, measurable, and verifiable MPOs, but we weren't given the chance.

It also appears that the County Board simply overlooked sections of the charter. Pages 39 and 40 of the LAI charter provide concrete examples of how data was used to modify our educational program, and how it's used on an ongoing basis. For example, we noticed that our students' performance on the CAASPP in Math needed improvement, so LAI implemented a yearlong math support course for 11th grade students, and started administering practice exams schoolwide beginning in 9th grade to familiarize students with the material and testing environment. We noticed that the transition from middle school to high school was challenging for many students so we implemented the Summer Transition Program where students enroll in Math Readiness, English Readiness, and an elective to make the transition smoother and set the students up for success.

The law doesn't require that a charter include an MPO for every single available data point. The LAI charter includes more than 20 MPOs that are aligned to the state priorities and our school's demographics, which exceeds the legal requirements.

- **Element 3.** The County Board found the LAI charter renewal petition doesn't provide a reasonably comprehensive description of the methods for measuring pupil progress because the charter: (1) doesn't include the California Physical Fitness Test; (2) doesn't include the California Alternative Assessment for eligible special education students; (3) doesn't specify the tools used to identify and exit students for English and Math Intervention; and (4) doesn't specify what standards-aligned benchmarks the students take on Illuminate and how they are used.

LAI's Response.

This section of the "findings" is very nit-picky. The charter affirms on page 1 that LAI will conduct all required statewide assessments, including the California Physical Fitness Test and the California Alternative Assessment for eligible special education students. The "tools" to test whether students need interventions are described throughout Elements 1, 2, and 3, and include report cards, progress reports, performance on class projects, CAASPP scores, internal assessment results, teacher observations, etc. LAI uses the benchmarks from the dashboard in Illuminate, as well as teacher made assessments, although that level of detail is not required to be included in a charter.

- **Element 4.** The County Board found the LAI charter renewal petition doesn't provide a reasonably comprehensive description of the governance structure because: (1) the org chart doesn't include all positions and the School Site Council; (2) there's no description of the School Site Council; and (3) portions of the EL Master Plan, Student and Parent Handbook, and school policies are outdated.

LAI's Response.

The law doesn't require that a charter include a comprehensive org chart identifying every single position. We would have been happy to include the Curriculum Specialist/EL Coordinator, Athletic Coordinator, and School Site Council ("SSC") in the chart independently, but the County didn't ask. However, their positions are identified as Faculty and Staff which is on the org chart.

LAI does, in fact, have an SSC, which is referenced in various places throughout the charter (see, e.g., pgs. 13, 61, 95). We even submitted our SSC Handbook that contains the rules and regulations for the SCC to the County. The composition and duties of the SSC are in the handbook and defined by law so we didn't see any need to include them in the charter.

Again, we are happy to revise our EL Master Plan, Student and Parent Handbook, and school policies as necessary to comport with legal requirements and our current practices.

- **Element 5.** The County Board found the LAI charter renewal petition doesn't provide a reasonably comprehensive description of the employee qualifications because: (1) the org chart doesn't include all positions; (2) some job descriptions are missing; (3) there is no reference to EL authorizations or special education credentials for teaching staff; and (4) qualifications for certain positions don't seem to align to the position's duties.

LAI's Response.

See above for LAI's response about the lack of a comprehensive org chart. The Curriculum and EL Coordinator works directly with the teachers with regard to training, monitoring compliance of the academic program and is the administrator to the SSC. The Executive Director is responsible for supervising all staff and performs the official evaluation of teachers.

The law does not require a charter to list the qualifications or include job descriptions for every single position at the school. (See 5 C.C.R. § 11967.5.1(f)(5).) Rather, the law requires that a charter identify general qualifications for the various categories of employees, and specify additional qualifications for key positions. (*Id.*) The charter for LAI goes beyond what is required and, frankly, goes above and beyond what is described in most charters throughout the state.

All teachers providing EL instruction, including our EL Coordinator, are required to have the proper EL authorization. Likewise, all staff providing special education instruction are required to have the appropriate credential required by law (charter, p. 30). Our dance/yoga teacher is currently in the Los Angeles County Office of Education's clearance program and her EL authorization comes upon completion. However, LAI applied to the state for a waiver for her to keep compliant.

The Operations Coordinator is required to have knowledge of sports and CIF rules because she works closely with the Athletics Director and Activities Coordinator to plan events. We're confused why the County thinks that's problematic.

- **Element 6.** The County Board found the LAI charter renewal petition doesn't provide a reasonably comprehensive description of the health and safety procedures because: (1) the school doesn't describe vision, hearing, and scoliosis exams; (2) several policies were not included in the Student and Parent Handbook; (3) and the charter doesn't include procedures for obtaining a signed concussion and head injury information sheet from parents.

LAI's Response.

If the County Board would have approved our charter renewal petition, we would of course have complied with any legal requirements for vision, hearing, and scoliosis exams for middle school students.

LAI does have policies against the use or possession of drugs, alcohol, and tobacco on campus. Our zero tolerance policy for students is included on page 10 of the Student and Parent Handbook, and our policies for employees are found on pages 17 and 18 of the Employee Handbook. We understand the County Board believes that some of our policies and procedures are outdated or insufficient, but we're more than willing to update them as necessary to comport with legal requirements.

- **Element 7.** The County Board improperly denied the LAI charter renewal petition because it found the student population served at the school is not reflective of the population residing in LAUSD.

LAI's Response.

Achieving a racial and ethnical balance reflective of the local school district is a goal, not a mandate. Indeed, the only way to attain a “matched” racial and ethnic balance would be selective enrollment with race-based preferences, which is discrimination and would violate state law. (See, e.g., Ed. Code, § 47605(d)(2)(A).) Our charter affirms in multiple places that LAI does not discriminate against students. (See, e.g., pgs. 1, 86, 123.) We'd like to note that when the State Board reviews this element of a charter, it is presumed to be reasonably comprehensive unless there are barriers to enrollment, because of the limitations on admissions to a charter school imposed by the law. (See 5 C.C.R. § 11967.5.1(f)(7).)

As required, our charter petition reasonably describes the means by which LAI plans to achieve a racial and ethnic balance reflective of LAUSD: concentrating efforts in certain neighborhoods based on their demographic makeup; conducting regular student recruitment fairs and information meetings; providing marketing materials in English and Spanish; distributing flyers throughout the local community; taking out ads in local newspapers; sending direct mailers to homes in close proximity to the school; visiting local schools to distribute flyers; sending emails to families; using social media to reach a wide audience; partnering with organizations throughout Los Angeles; and many other methods. (Charter, pgs. 86, 87.)

- ***Element 8.*** The County Board improperly denied the LAI charter renewal petition because it found the school requires parental participation.

LAI's Response.

We apologize for any confusion so let us clarify: parental participation is not a requirement for acceptance to, or continued enrollment at, LAI. While we hope that parent show up to the enrollment tours and meetings and help their student complete the enrollment packet, no student is punished for their parent's inability or unwillingness to participate. In fact, LAI will pair students with an employee, usually on the admin team to help support them.

- ***Element 9.*** The County Board found the LAI charter renewal petition doesn't provide a reasonably comprehensive description of the procedures for annual independent financial audits because the charter: (1) doesn't specify who is responsible for contracting and overseeing the audit; (2) fails to include a timeline for resolving audit exceptions; and (3) doesn't explicitly state that the auditor will be hired by the Board of Directors.

LAI's Response.

Element 9 of the charter renewal petition on appeal to the State Board has the exact same language as the 2014 version that was approved by the County Board. And it's improper for the County Board to deny a charter renewal and shut down a school for failing to comply with a County policy requiring a specific sentence in every charter.

If the County had told us about these issues, we could have easily addressed them. The Board of Directors, with support from the Executive Director, is responsible for contracting with an auditor and overseeing the audit. The charter states on page 91 that audit exceptions will be resolved to the satisfaction of the County, which also means within a satisfactory timeline.

- ***Element 10.*** The County Board found the LAI charter renewal petition doesn't provide a reasonably comprehensive description of the suspension and expulsion procedures because: (1) the expulsion appeal rights create a conflict; (2) there's no mention of a plan for periodically reviewing our procedures; (3) our no tolerance policy for drugs, violence, and alcohol isn't aligned with due process; and (4) the Student and Parent Handbook permits expulsion after 12 absences.

LAI's Response.

We apologize for any confusion about our expulsion procedures. A student may only be expelled after a hearing before, and upon a recommendation by, the Executive Director (charter, p. 100). An expelled student then has the right to appeal the expulsion to the LAI Board of Directors (charter, p. 102), as per the policy and explained in the capacity interview.

The process for period review of our suspension and expulsion procedures is described on page 95 of the charter. The Executive Director is responsible for reviewing the school's disciplinary policy and procedures and making recommendations to the Board for changes that will ensure equitability for all students. The Board will then review those recommendations and take action as needed.

Our zero tolerance policy simply means that any student who breaches that policy *may* be subject to expulsion in accordance with the due process procedures described in the charter. The Student and Parent Handbook doesn't say anywhere that a student will be automatically removed or expelled.

Similarly, 12 unexcused absences *may* result in dismissal from our program but students are of course afforded the due process required by law. This usually only comes up when a family moves away without dis-enrolling their child.

- ***Element 15.*** The County Board found the LAI charter renewal petition doesn't provide a reasonably comprehensive description of the closure procedures because the charter: (1) doesn't specify that a list of students will be provided to the person responsible for closure activities; (2) doesn't specify how personnel records will be transferred; and (3) doesn't specify the source of funds to be used for closure activities.

LAI's Response.

The LAI charter petition does, in fact, contain all of this information. On page 115, the charter states that the school will prepare an electronic master list of all students and send it to the County. Page 116 explains that personnel records will be boxed, labeled, and transferred to the County in accordance with the County's procedures, and any remaining records are to be destroyed or disposed of to safeguard the individual's privacy. Page 113 states that upon a closure action, the LAI Board will immediately determinate how the school will fund closure activities. Page 116 states that the charter school will pay for the final closeout audit, and any outstanding debts or liabilities are the responsibility of the school, which can be paid from leftover unrestricted funds.

Finding #6: *The County Board improperly found that the LAI charter renewal petition does not satisfy all of the "Required Assurances." (Ed. Code, § 47605(b)(5).)*

"Finding #6" doesn't make sense and contradicts "Finding # 4." Again, this is a clear cut legal standard that our charter meets. LAI has affirmed that it will comply with each and every condition that is required by law.

Page 1 of the charter contains the clear statement: "The Charter School will ensure that teachers in the Charter School hold a Commission on Teacher Credentialing certificate, permit, or other document equivalent to that which a teacher in other public schools are required to hold. As allowed by statute, flexibility will be given to noncore, noncollege preparatory teachers." Although this assurance isn't even required by law, it's unquestionably in the charter. See above for our responses to the EL authorization and special education credential issues.