

DCSD Staff Recommendation on Charter School Application



Recommendation: The recommendation from DCSD Staff is to **Deny** the 2023 Charter School application of John Dewey Institute (JDI) in all four proposed locations.

Overall Recommendation Guidance

- The DCSD Long Range Planning Committee (LRPC) has not identified land parcels in the applications as surplus, therefore this land is not available for charter schools.
- There are extremely low (2) letters of intent that have been submitted and/or collected (unverified).
- The proposed Governance structure is not at arms-length. There is no evidence of a school Board of Directors, or a viable Charter Management Organization (CMO), and the Governing Board does not have a clear line of authority over the CMO.
- Parents are not involved in the design phase of the school, and are represented as the minority in school Boards of Directors.
- Douglas County Schools has approximately 900 students identified as students with autism indicating that almost every student in DCSD with autism would need to enroll at JDI schools to fulfill enrollment projections.
- Program is designed for a target audience of students with autism, but enrollment preferences do not identify prioritization for students with autism.
- The financial viability of the school is dependent on a claim made to the Colorado School District Self-Insurance Pool (CDSIP).
- Financial gaps in the budget are identified, and these do not allow for the proposed schools to be successful.
- The proposed budget is not sustainable, and includes revenue streams that are not available (Categorical Revenue, Tuition Cost Reimbursement)
- The application states that JDI is dependent upon the approval of ASI, and the recommendation of CART is to deny the ASI application.
- With the intention to have students on the Autism spectrum receive a diploma, it is unclear what JDI's graduation requirements are.
- The school application only included one person, and there were no others represented in any meeting, presentation, or interview.

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Evidence

Evidence of Support

Provide details on the student population to be served, how the founding committee has reached out to parents of targeted students, how many parents have expressed interest in the school by submitting letters of intent to enroll, and what community organizations, colleges and universities, nonprofits, and local groups are in support of the school as evidenced through letters of support.

Strengths:

- The District is eager to create programming that better meets the needs of students with disabilities. The District would be eager to explore models for this work in the future.

Concerns:

- Much of the evidence that has been requested is absent from this portion of the application including Letter of Intent and Letters of Support. These missing items are crucial to this portion of the application, and thus this portion cannot be properly evaluated. When asked for more evidence of intentions to enroll, the applicant stated they had 2 letters of intent, but with no further information.
- The Sterling Ranch site and one of the Crystal Valley Ranch sites have been identified for construction of neighborhood elementary schools in the next bond cycle and no Ridgeway property exists yet (and is years away from being construction ready). These sites have not been recommended as and/or determined surplus by staff, LRPC or BOE.
- No current community members or leaders have been provided who are in support of this school, or future partnerships.
- The applicant states in the application, and also in the capacity interview, that support from the community is there, but intents to enroll will only be collected after the application is approved.
- Letters of support from community partners are from 2018-19 application. Unable to evaluate and determine if met criteria without current, relevant letters and/or data.
- No steering committee proposed beyond current and/or proposed staff members of Lighthouse on a Hill.
- No parent or community representative on the steering committee is identified in this section's responses.
- Community meetings are proposed to happen after charter approval. It is unclear if recent community engagement for 2023 applications have been held and to what degree.

Financial Plan/Budget

Provide structured evidence of the systems and procedures in place to ensure the school and Board

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follow sound financial practices to make sure their school is financially stable and funds are appropriately used to support the mission and vision of the school. Additionally, provide a summary of the 5-year school budget that includes a description of the school start-up plan, services and specific programming for both the academic and non-academic program, and any other areas of service that are unique to the school model.

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Strengths:

- The applicant acknowledges financial practices and financial transparency requirements. All aspects of the accounting operation will be completed by the Charter Management Organization (CMO).
- Selection of the auditor is the responsibility of the Board of Directors.
- Financial policies and procedures are developed in an appendix.

Concerns:

- While an audit requirement is noted, there is no budget for an accounting firm to complete the audit.
- The roles and responsibilities of the three organizations are not clearly defined and developed. It is unclear how the staffing at JDI will support ASI. JDI will not pay any fee for the CMO - so all support provided from the CMO is paid for by ASI.
- Application states in several areas that ASI provides support for JDI, but the budget for either school does not reflect the cost of this support such as the audit, website presence, financial transparency requirements etc.
- The budget narrative is not clearly reflected in the budget template, and there are a number of contradictions. Revenue sources of Colorado Charter Schools Program (CCSP) start up grant, Perkins Grant are potentially incorrectly included in the budget and are not guaranteed sources of revenue. If these are not received, the school risks a negative net income. When asked about contingencies during the interview, the notice of claims funds were identified to resolve all shortages or grant funds that may not be received. The applicant has not provided confidence that different scenarios have been considered and that contingency plans are established.
- The contract for special needs (\$800k from Crystal Valley, \$1M at Ridgeway and Sterling Ranch) paid from ASI to JDI is unclear. It is still unclear, even after requesting additional information, as to what is provided to ASI from JDI for these funds, and it is not included in the draft partnership agreement.
- The budget for JDI is entirely dependent upon the success of Alexandria School of Innovation (ASI), another proposed and separate authorized charter. Without ASI's facility support, coverage of CMO costs and ongoing contract services revenue contribution, JDI is not financially sustainable.
- The budget template and narrative do not provide details for contingency plans for revenue fluctuations in case grant funds are not received.
- JDI included Tier A and Tier B funds at 50% referenced on the template as Tuition Cost Reimbursement. These funds are not provided to Charter schools and the loss of these funds results in a negative net income.
- Application indicates an interest in being an Administrative Unit, this is a new opportunity provided by the State. The applicant would need to determine from the State if they are able to meet the requirements for AU status, this would not be a District decision.
- JDI provides staff that will be required for support at both ASI and JDI specifically ELD, Nurse, Paraprofessional staff, the level of staffing in JDI is not sufficient to support both schools. This support is also not described or addressed in the draft partnership agreement.
- Projected enrollment and growth figures do not reflect historical growth in Douglas County and there are only two letters of intent for one of the JDI locations.

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Educational Plan

Show an educational program detailing an effective, well thought out, research-based educational program that aligns with the school's mission, goals, and the student population, along with the state standards of Colorado. Additionally, define the Curriculum and program alignment, instructional strategies, structures and supports for specials and electives, and professional learning requirements of the school.

Strengths:

- Aspirations to offer various research labs and CTE pathways with varying focus is admirable.
- There is an acknowledgment of the need for training for SPED, EL, ML, and GT students was included in the professional development plan.
- There is a plan for extended learning opportunities at the proposed school
- The plan references the opportunity for teachers to meet weekly in PLCs with administrations to discuss student progress

Concerns:

- An extensive list of possible CTE pathways and research labs is presented with no clear plan for implementation
- Little to no evidence citing research for all curricula being aligned to the state standards.
- There is no evidence that the John Evans curriculum aligns to current Colorado Academic Standards
- It is still unclear what specific actions will be taken to implement the Colorado Academic standards and revision cycles.
- With the intention to have students on the Autism spectrum receive a diploma, it is unclear what JDI's graduation requirements are.
- Very little detail is provided as to how RtI will be incorporated into the schools instructional programs for all students, during the school day.
- The application predicts a larger number of twice exceptional students; however, the SST Team does not include a gifted education specialist.
- The overview of Gifted Education provides a general overview of gifted programming; however, there is no research and evidence based strategies specific to identifying and meeting the unique needs of twice exceptional students.
- Although there is a plan for after school enrichment, there is no established criteria for selection of participants, times of operation, and the number of students that may attend.
- No concrete plan for securing qualified staffing for all the intended CTE coursework.
- There is a lack of clarity in understanding how the unique focuses will be structured and implemented.
- It is difficult to assess exactly how JDI will implement programming for students with special needs as a lot of the modeling is based on how another school, Prospect Academy is modeled. There was not a deeper understanding provided of how JDI will serve the students. The mix of services and staff to provide them between ASI & the embedment of JDI is not solid as JDI students will likely need full supports all day and then how will that same staff serve ASI students that will need supports to some level.
- The application lacks details for training specific to SPED, EL, ML, and GT students in the professional development plan.

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- There is significant professional development listed with seemingly little detail of how the time for all of the professional development would occur within teacher contract hours and still meet student instructional time.
- Block scheduling is referenced, but only a list of commonly used options was presented rather than actual strategies for implementation of a block schedule which makes it impossible to evaluate whether or not students will meet instructional minutes or align with the block scheduling of ASI.
- Applicant has stated they intend to apply for the non-automatic state waiver 22-32-110 (1)(n)(1), C.R.S. Local board duties concerning school calendar in Section O which is in direct conflict with the statement the school will follow DCSD's calendar and schedules in this section.
- It is stated in the application that, "--cases of minority languages with speakers of less than one million" may not receive such services. This is not the Department of Justice, USED, or OCR guideline.

Parent and Community Involvement

Show a clearly defined target population, and evidence that demand for the program among the target population exceeds available space. Include the roles of parents/guardians, community members, and community organizations and the role they will play as part of the school community.

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Strengths:

- Applicant identifies the need for a volunteer coordinator.
- The proposed goal of annual survey and 80% satisfaction is an admirable goal.

Concerns:

- Letters of support from community partners are from 2018-19 applications. We are unable to evaluate and determine if the applicant met criteria without current, relevant letters and/or data.
- No steering committee was proposed beyond current and/or proposed staff members of Lighthouse on a Hill CMO.
- No parent or community representative on the steering committee is identified in this section's responses.
- Proposed volunteer coordinator responsibilities and duties are unclear (one part time for all schools).
- Proposed parent vs. non-parent make up of the steering committee is unbalanced, with parents representing a minority portion of the team.
- Community meetings are proposed to happen after charter approval by the DCSD Board of Education. It is unclear if recent community engagement for 2023 applications have been held and to what degree.
- There is a narrow focus of targeted neurodivergent population and programming requires better demonstration of identified need. There are questions surrounding if the target enrollment exists in Douglas County and/or general proposed school locations.
- Sample Letters of Intent were asked for in the application, but were not uploaded in CHARTER.TOOLS software
 - The applicant response to this question simply states it has been done but does not demonstrate or share how or if this was done in any way
- No demonstration of engagement or outreach to at-risk and/or targeted population mentioned (other than the autistic/neurodivergent community)
- The applicant has made no definitive plans for student recruitment, and stated in the capacity interview they had not attempted to recruit students prior to the approval of the charter due to concerns with past events with a previous application submitted to DCSD. Not only is there no intentional plan to ensure access to diverse sets of students, but there is no plan to recruit any students.
- The enrollment policy does not identify how students with autism will be given enrollment preference in alignment with the school's focus in the mission and vision statement.
- It is unclear, given the specific focus of this school, how the lottery process will incorporate the needs of all students and how the lottery will match projected enrollment, specifically with students with disabilities.

Human Resources

Provide information on the school's employees and employment policies, and the relationship that will exist between the charter school and its employees. Additionally, if the proposed charter school intends to contract with an education service provider, such as a Charter Management Organization (CMO), or Education Management Organization (EMO), or any other type of school management or

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service provider.

Strengths:

- A staffing and recruiting plan is outlined in the plan.
- The evaluation plan seems to meet the intent of Colorado SB 10-191.

Concerns:

- The process by which the initial Board was identified is not provided other than they were involved in the STEM school over 10 years ago. There is significant concern about the purposeful omission of parent representatives on the board in the school's initial year (where parent voice is most critical) and then parents serving as a minority on the board thereafter.
- The applicant did not describe the process to appoint or elect the initial governing board.
- There has been no involvement by the Board members stated in the application during meetings, capacity interviews, or other correspondence.
- It is of significant concern that there is no arm's length plan for the evaluation of the Charter Management Organization (CMO) by the governing board and this is exacerbated by the fact that the CMO's CEO is a founding board member. There is no description of how the CMO was selected, as it was self-selected by the applicant prior to the submission of the application.
- Gillem is the contracted staff for special service providers (OT, SLP, etc.) but the amount in the budget is not sufficient to support students that are the proposed student population of JDI.
- The information provided in this section is unrealistic given the current challenges with recruiting, hiring, and retaining qualified teachers which is exacerbated by the amount of specific skill sets needed to teach at this school, specific to industry.
- Additionally, while the school promises competitive pay, these numbers are assuming the school receives funding that is not currently guaranteed. The success of this school's educational program is highly dependent on the teachers and the skills of those teachers in their building, and this is concerning.
- The JDI Application references a TIP program (essentially an alternative licensure program) A school/district must be approved by Colorado State Board of Education to provide an alternative licensure program. The approval process is extensive and takes time. There seems to be little understanding of these requirements.
- The CMO stated here does not have a history of success, or a history at all working in this capacity. No summary of the performance data for the schools the education management provider is managing at the time of the application or has managed previously, was provided given they don't exist.
- It is difficult to assess exactly how JDI will implement programming for students with special needs. The mix of services and staff to provide them between ASI & the embedment of JDI is not solid as JDI students will likely need full support all day.