

Louden Mullin Charter School Application Review Gunnison Watershed School District

This report is submitted by Jon Nelson, Business Manger; Suzanne O’Dea, Director of Special Services; and Dr. Christine Purkiss, Director of Curriculum and Assessment.

First and foremost, this application appears to violate C.R.S. 22-30.5-106.2, which states that "No person, group, or organization may submit an application to convert a private school or nonpublic home-based educational program into a charter school or to create a charter school which is a nonpublic home-based educational program as defined in section 22-33-104.5." Evidence from the application that supports this apparent violation is listed below.

1. The educational program proposed in the application is the same as the program already in practice at the Sage Mountain School. There does not appear to be any differences between the new charter application and the original school.
2. Assets currently owned by Sage Mountain may be donated to Loudon Miller in the event that Sage Mountain School closes, suggests that closure of Sage Mountain is a possibility which leads us to believe that a conversion from private to charter school is the intent of this application.
3. In staff recruitment, the application states that it is the intention to explore local residents as candidates first. The fact that two of the existing Sage Mountain teachers are on the Steering Committee for this application along with the Director of the Sage Mountain School leads us to believe that these staff members will be recruited for the new charter school thus leaving Sage Mountain with minimal staff.
4. With regards to a facility for the charter school, no actual facility is named in the application. Of the potential sites listed, we understand that the property listed at 101 7th Street is currently owned by one of the founders of the Sage Mountain School, Sarah Phipps. This possible donation of property from a founding member of the Sage Mountain School also leads us to believe that this application is a conversion from a private school to a charter.
5. Throughout the application there are indications that this program is already in place. One example can be found on P.19 in the section on “the Arts” in the sentence that begins “Although the arts are incorporated in the classroom, we also have specialists who teach art and music to both the primary and intermediate classes. The specialists work closely with the teachers to integrate.....” This sentence suggests to the reader that this is already happening and there are several other sections within the application that imply a program already in place. The authors have in other parts of the application used terminology that implies a future intent such as on P.24 in the section on annual calendar, the authors use the words “intends to”.

In addition, this committee would like to note the following concerns with the application and information provided:

With regard to budget:

1. There is no mention in the application of how the Charter School will manage its finances. Will the District do this through a contractual arrangement or will they maintain their own

system and the district simply pass along the PPR. This question has not been fully outlined in the application.

2. References are made regarding engaging in “intensive professional development” according to the ELS approach but the budget only allocates \$500.00 for this endeavor. This amount seems extremely low for any form of professional development beyond six to eight clock hours held locally.
3. Within the projected budget there is a large reliance on grants and fundraisers to maintain the charter school program. In year one that figure is \$60,000, year two it is \$73,000 and in year three it is \$86,000. Historically these are not stable sources of revenues to be relied upon to balance a budget.
4. In the discussion of Amendment 23 and utilization of the one-percent increase they anticipate using that amount on increasing salaries for teachers. As it currently stands, Amendment 23 expires in 2010, and the concern would then be how does the Charter School continue to fund salaries without that continued revenue source?
5. The application outlines that the Charter School will pay for an employee's health insurance but no mention is made about paying the employers portion of Medicare.
6. The Charter School mentions that their teachers will belong to PERA and that the charter school will pay the employer cost, but there is no mention of how they plan to become a member of PERA. PERA also appears to have been calculated using the employee's contribution and not the employer's contribution.

With regard to the educational program:

7. The Charter School proposes to use an expeditionary approach to teaching and learning and proposes that they will affiliate with the official ELS program. This program is by invitation only and is an additional cost which has not been included in their budget.
8. There is no mention of student achievement on the District Writing Assessment and how that assessment will guide instruction in writing. Six trait writing is a model for writing and not an assessment. No mention is made of what research-based assessment tool will be used by the Charter School to measure writing for their students.
9. There is no mention of assessment to check for placement of a student if a student enters the school during the school year. How will the staff know where to place a student with regards to mathematics and reading curriculum?
10. The application references research-base assessment tools in mathematics to show that students have made at least one year’s growth but there is no mention of what these assessments will be.
11. Students at the charter school will be included in district measurements for AYP. There is no mention of AYP in the Charter School application accountability plan on pages 9-11 and we have concerns regarding how the staff will take corrective measures regarding meeting AYP if needed.
12. References regarding their growth plan on page 4 of the application indicate age groupings crossing the span of Pre-K to 8th grade with only three teachers in the first year for 36 student’s, however, they do not indicate how those three groups will be divided into three teacher groups.
13. Page 7 of the application indicates a panel of community members will “formally determine (a student’s) readiness to move on to the next grade level”. How will decisions be made for

students with disabilities and English Language Learners who are working towards modified content standards or English Language Development Standards?

14. What data was collected on the Gunnison Watershed's 1600 plus students to determine on page 8 of the application that district students are "often unable to have their individual needs met sufficiently"?
15. The literacy component on page 22 references "literature focused instruction" but does not appear to meet requirements set forth by CBLA (Colorado Basic Literacy Act).
16. Page 9 references the use of the DRA, QRI and other reading inventory assessment tools but the DRA and QRI do not meet CBLA (Colorado Basic Literacy Act) requirements. How will the Charter School comply with the requirements of CBLA?
17. The school's accountability plan indicates for each goal that charter school students will "meet or exceed the district's average on the appropriate grade level CSAP" tests but do not indicate how this will be measured, for example, average scores, % of students proficient or advanced, etc?
18. The Assessment Program on page 25 suggests "every student will meet or exceed each of the Colorado State Standards for grades 5-8 and be fully prepared for a successful high school career. If students do not meet these standards, is it the philosophy of the school to retain those students?"
19. There is no inclusion of CSAP assessments in Science for 5th or 8th grade and how these assessments will be used to measure student progress towards stated goals.

With regard to staff:

20. The application references hiring a classroom teacher who is also a licensed special educator. However, there is no reference to how that teacher would provide individualized instruction and programming to identified special education students while maintaining a 1:12 student/teacher ratio. In addition, we do not see this FTE represented in the budget proposal.

With regard to transportation:

21. Transportation is a need and access requirement for some students with disabilities. The charter school does not appear to have considered this added expense and needs to account for it within their special education budget.
22. We have concerns with the proposal to purchase vans to transport students as there are State of Colorado guidelines around the type and size of van that is appropriate for transporting students and there is no mention of this in the application.

With regard to Special Services:

23. Although the application references complying fully with all state and federal guidelines for effective delivery of services to all special education students, the state and federal money allocated for such students often only covers approximately 20% of those costs. It is a great concern that there is no mention or consideration of this expense in the development of their budget. Furthermore, if the school is interested in contracting with the District's Special Services Department, it is important to note that costs for service providers such as Occupational Therapists, Speech Language Therapists, Audiologists, Teachers of the Deaf and Hard of Hearing, Physical Therapists and contracted special educators range in hourly wage from 25.00/hour to 50.00/hour for contracted services. Currently, our school psychologist, school nurse, and speech language therapist are all already serving a number of

students above the state recommended average and therefore would not be able to serve an additional site without jeopardizing the services to students they already serve. Therefore, effort would need to be made by the Charter school to secure these providers independent of the current RE-1J staff.

24. We have concerns that eligibility of low income students was referenced under special education services. Students on the Free and Reduced Lunch program do not fall under the same provisions as students with disabilities and therefore should not be mentioned or referenced as such.
25. The ELL plan on page 39 does not meet the Office of Civil Rights or CDE requirements for the identification of ELL students. The notification requirements are correct but the identification procedures, provision of services to ELL students, are not aligned with OCR and CDE guidelines. In addition, there is reference to "ELL staff". Is the charter planning to hire teachers with experience and knowledge of second language acquisition?

With regard to a facility:

26. There is no mention or reference as to what actual facility would be utilized for this educational program and we are concerned whether that facility would meet ADA requirements for accessibility.
27. Local churches are given as a possibility for use as a facility for the Charter School. This raises concerns over 1st amendments issues as state funding cannot be used to support church related programs. Zoning issues, parking issues, removal of religious icons from church premises that are utilized by any public school program, are all of concern if the Charter School should elect to use a church property.

It is apparent that the Loudon Mullen Charter School Steering Committee has spent a great deal of time and energy in collecting information and completing this application and we commend this effort. However, because of the extent of the concerns listed below and the belief that this is a private school conversion, it is our strong recommendation that the application be denied at this time.