

# Memo

**To:** BVSD Board of Education  
**From:** District Accountability Committee  
**Date:** January 4, 2019  
**RE:** Recommendation on the Ascent Classical Academy Charter Application

To fulfill the DAC responsibility as defined in Colorado Revised Statutes:

*22-11-302 (1)(c) -- If the local school board receives a charter application, to review the charter application prior to consideration by the local school board as provided in section 22.30.5-107(1).*

## Process

The District Accountability Committee (DAC) selected a representative subcommittee of volunteers to review the application and make a recommendation. A list of the subcommittee members is included in Appendix A. Assistance was also provided by an external consultant on charter school authorizing. In addition to reviewing the submitted application, DAC invited representatives from Ascent Classical Academy to provide an in-person presentation and participate in an interactive Q&A session on December 17, 2018. It should be noted that the DAC only had a month (which also partially spanned winter break) to review the application and provide the board with a recommendation.

## Recommendation

The subcommittee voted 7-2 to recommend that the BVSD School Board deny the Ascent Classical Academy application at this time given identified concerns. With a typical timeline, the subcommittee could have engaged in a more thorough discussion and may have been able to get to full consensus. The entire subcommittee, however, did agree on the identified concerns, which include:

- **Governance and Capacity.** Without a named board, it is unclear who will actually hold (and be accountable for) the charter establishing the school. Furthermore, the role of the education service provider is unclear. More information is needed on how independent the school will be from the ESP and how it will hold the ESP accountable. There is also concern that as a part of a new network within the state (including a new school last year), it is not evident that the ESP has the capacity to scale up in 2019. There were start up challenges at the new school last year.
- **Facility.** Without a clearer picture of the proposed facility plan, it does not seem feasible that the applicant will have a functional building by fall 2019. The network has already experienced enrollment issues when needing to move buildings.
- **Enrollment.** The enrollment section of the application needs clear targets. With two other schools in the network, the enrollment plan should be clear and be informed by past experience. In the interview, staff provided contradictory numbers for their previous enrollment targets.
- **Equity.** While stating an openness to serving to all populations, there is a mismatch with the proposed performance goals, enrollment plan, educational programming, and other operations for special populations of students.
- **Waivers.** The current replacement plans are vague. Clarification is needed on which policies simply require more charter-friendly adjustments and which require an alternative plan.

The subcommittee does acknowledge that there is evidence of interest in the school and the classical version of core knowledge would be a unique approach within the BVSD portfolio. With answers to the lingering questions and a more viable timeline, this applicant could demonstrate a likelihood of success in the future. A more detailed analysis from the DAC is provided in the next section. It is organized by selected sections of Colorado's Standard Application Review Rubric which has been adopted by the district.

## Detailed Analysis of the Application

**Vision and Mission:** This section reflects the school’s mission and vision statements as developed and agreed upon by the members of the founding committee and the school community once the school is formed. These statements should answer the questions, “What is the purpose for the school and what is the applicant team’s vision for the school?” An explanation should be given as to the process and impetus for developing both the Mission and Vision Statements.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>The application lays out both vision and mission and the two are linked.</li> <li>The network already has two other schools that are concrete examples of the mission and vision.</li> </ul>	<ul style="list-style-type: none"> <li>“Improving hearts of young people,” while laudable, is not measurable. It is a subjective purpose and outcome.</li> <li>It is not clear who decides which “personal habits” are indicative of responsible, independent and productive society members. What are the primary sources for teaching “moral character?”</li> </ul>

**Goals, Objectives and Pupil Performance Standards:** This section focuses on the specific outcomes anticipated for the school and its students within the terms of the charter (usually four years). The majority of the goals and objectives are focused on specific student outcomes (pupil performance or educational performance goals); others are broader school-based goals and objectives (organizational and management performance goals).

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>The goals are presented using the SMART format. The goals are aligned to the mission and vision of the school.</li> <li>Goals reference state measures.</li> </ul>	<ul style="list-style-type: none"> <li>Goals need to be revised and should include state measures that align with the accountability system. With two other schools operating in the state, one of which having a couple of years with a consistent state assessment, this is a reasonable expectation.</li> <li>Concerns that the application states, “Our team expects, and will retain the right, to make significant revisions to the performance and growth goals as more information becomes available on state assessments.” The application goes on to state that “ACAF may also provide results from other nationally normed tests, such as the Iowa Test of Basic Skills (ITBS), to demonstrate academic success.” If the charter is evaluated against these goals, then they really should not be changing and should align with the state accountability system.</li> <li>Need more comprehensive goals. There are no goals aimed at grades 9 and 10; PSAT is not mentioned. There are no goals aimed at language acquisition for ELLs; ACCESS is not included.</li> <li>Concern about the deficit view of historically underserved populations. Growth goals are at the 50<sup>th</sup> percentile for students, but then ramped up to 70<sup>th</sup> percentile for ELL, FRL and special education students. While we agree that students that are not on grade level need acceleration, it may be better to focus the higher growth goals for <i>any</i> student that is not on grade level, rather than assume certain student populations will need accelerated goals.</li> <li>While other campuses in the network have some signs of success in achievement, their growth is pretty low (e.g., Golden View has had less than the 40<sup>th</sup> percentile). Because of small n-counts, it is difficult to determine if this model has demonstrated success in meeting the 70<sup>th</sup> percentile targets for special populations. The applicant could provide an analysis of academic achievement results for special populations by aggregating grade levels, or analyzing results over time. In the meantime, it does not look at though the network has a history of meeting this goal.</li> </ul>

**Evidence of Support & Target Population:** This section provides detail 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	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>● Replicating existing models that are already established with a record of achievement.</li> <li>● Letters of interest were available.</li> <li>● Attracts non-traditional kids (e.g., home school, private).</li> <li>● Flexible enough approach to accept new students up to grade 10.</li> <li>● In interview, school staff stated an openness to recruiting a diverse population of students.</li> </ul>	<ul style="list-style-type: none"> <li>● Clearer targets are needed. In the interview, staff provided contradictory numbers (with as much as 100% variance) for their previous enrollment targets for other school in the network.</li> <li>● In thinking about this application as an expansion of other schools in a network (e.g., Golden View), more background should be provided on current practices in recruiting, serving and retaining diverse student populations. Specific outreach to at-risk, lower-income and minority communities has not occurred to date. Some questions to consider are:             <ul style="list-style-type: none"> <li>○ Can you share some of your experiences from Ridgeview, Golden View and Vanguard for recruiting and serving diverse students? What insights have you gained, and what lessons have you learned?</li> <li>○ Have these other schools met their enrollment targets? Why or why not?</li> <li>○ Specifically, how close have these three schools come to serving a similar group of students (e.g., demographics, ELL, SPED, FRL) as their surrounding districts and neighboring schools?</li> <li>○ What recruiting practices have been most useful for recruiting target populations? What challenges have these other schools faced, and how have they adjusted their approach (e.g., recruitment, marketing)?</li> <li>○ What are the (annual, and to date) retention rates for ELL, SPED and other groups at these other campuses?</li> <li>○ Have particular groups experienced higher rates of attrition and how have the schools evaluated/ changed their approach to working with those students?</li> </ul> </li> <li>● The application is somewhat misleading as it is shared that the schools tend to reflect the neighborhood. In showing comparison schools, the application left out more diverse schools in the same vicinity (e.g., Lafayette Elementary, Angevine Middle, Centaurus High).</li> <li>● Furthermore, other campuses in the network do not seem to reflect the demographics of their districts (e.g., 2017-2018, 4.4% students at Golden View were eligible for Free &amp; Reduced Lunch (FRL), compared to 31.7% of students in the Jefferson County district as whole. Similarly, ELL enrollment in Golden View has ranged from 4.1% to 1.4% between 2015-2017, whereas Jefferson County Schools had a range of 10.9 to 9%; Students on IEPs at Golden View ranged from 4.4% to 4.9%, compared to Jefferson County at 8.9% to 9.5%). This suggests that this network struggles to attract diverse populations within neighboring areas. In the interview, the enrollment numbers provided for other campuses were unclear and sometimes contradictory. At a minimum, this deserves further follow up.</li> <li>● Given that a large portion of the early statements of interest have come from outside of BVSD, it is not clear why this application is being submitted to be located within BVSD boundaries.</li> <li>● Is the applicant open to recruiting in other places of worship, beyond traditional churches?</li> </ul>

**Educational Program & Standards:** This section details an effective, well thought out, research-based educational program that aligns with the school’s mission, goals, and the student population, and the state Common Core standards.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>● The application cites significant research to support the proposed curriculum.</li> <li>● Unique approach not currently available within BVSD schools. The core knowledge curriculum is an established model available in other parts of the state.</li> <li>● Some indication of success in other types of schools with a similar curriculum. Other campuses in this network have signs of success in achievement (e.g., Golden campus received a Performance with Distinction rating through CSI’s CARS system).</li> </ul>	<ul style="list-style-type: none"> <li>● More information is needed about how the curriculum is aligned to the Colorado Academic Standards.</li> <li>● Concerns that some of the curriculum is not currently set or is based upon interest (e.g., foreign languages beyond Latin, use of technology) and could have implications for college and career readiness.</li> <li>● With the relatively low enrollment projections in the early years (particularly at the secondary level), it is not clear that a variety of courses (e.g., advanced mathematics) can be offered.</li> <li>● Provide the data analysis behind this statement: <i>The curriculum, which has been tested now in twenty schools across the country, has proven to be successful for all students, including those with special needs and whose home language is not English.</i> Data has not yet been provided on how this approach works for special populations of students, and what supports/modifications may be necessary to ensure that this curricular approach is open and inclusive to all students.</li> <li>● More information is needed on specific strategies that will be implemented for students not on track to meet expectations. The application states “we cannot offer remedial classes,” Furthermore, only students with high GPAs may participate in extracurricular activities. However, the applicant seems open to some strategies. During the interview, the applicant noted hiring a reading specialist at one of the other campuses when they realized that some students need more supports.</li> </ul>

**Plan for Evaluating Pupil Performance:** This section expands on the Goals, Objectives, and Pupil Performance Standards by defining how the school will determine whether it is meeting its goals. It focuses both on internal assessments used to drive instructional decision-making, as well as external assessments used to communicate academic achievement and growth to stakeholders.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>● The application identified CMAS/CoAlt, and SAT as some of the summative assessments to be used by the school. The school also identifies the Iowa Test of Basic Skills and The Classical Learning Test (CLT) for students who wish to have an alternative college admissions assessment.</li> <li>● The school also mentions the use of DIBELS and teacher-created assessments for interim assessments.</li> </ul>	<ul style="list-style-type: none"> <li>● The bulk of identified assessments are mostly summative and will not fully allow the school to monitor its progress on the goals during the school year. It should be noted that BVSD has a similar issue. Assessments for ELL students are not named at all.</li> </ul>

**Governance:** This section provides detailed information on the governance philosophy and how the board will approach its oversight role, the role and make-up of the board and the role of the school's administration in carrying out the school's mission and vision.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>● The application speaks to extensive Board Orientation and Training. There is discussion of a Board Self Evaluation, a School Accountability Committee, and bylaws, that outline a number of important areas such as the number of directors, terms, appointment, expectations, vacancies, removals, resignations, officers and legal compliance and school policies. The application involves a conflict of interest statement, and a board member agreement, as well as a process for parents and community member grievances. The section also goes into detail with respect to the hiring process.</li> <li>● The application also identifies Ascent Classical Academies as the management partner/educational service provider. The management partner and other existing schools can provide guidance, assist with operations, and can act as a network of sorts.</li> </ul>	<ul style="list-style-type: none"> <li>● As the charter is granted to the board, it is concerning that individual board members have not yet been identified. This makes it difficult to ensure that the stewards of the school have the proper experience (e.g., education systems, budgets, accountability).</li> <li>● Concerns about a lack of controls for a conflict of interest in identifying and maintaining board membership. The current steering committee members are mostly employed by other affiliates of the Ascent Classical Academies. The board will be “self-replicating and self-perpetuating,” rather than established via elections.</li> <li>● The composition of the board is not reflective of a school with ties to the local community. There appears to be no avenue for parents of students at the school to serve as a board member, nor for local community members to serve in this role. Meetings of the board are not only off-site but far off-site (Golden) which would make it very difficult for parents to be involved.</li> <li>● DAC is unclear if one board will govern all campuses or individual boards for each school will be created. Remaining questions include:             <ul style="list-style-type: none"> <li>○ Who holds the Educational Service Provider (ACA) accountable?</li> <li>○ Is there a sample performance contract that could be provided for review?</li> <li>○ What adjustments will be made in the governance structure to accommodate unique qualities of communities?</li> </ul> </li> <li>● The SAC only makes recommendations to the principal. Would the applicant be open to expanding the SAC advisory capacity to the board, as well?</li> <li>● Not clear if they have established partnerships in the community yet or if those are intended next steps. For example, Impact on Education is listed as a partner, but this organization does not have record of anyone reaching out to them.</li> </ul>

**Employees:** This section should focus on the process to hire a school leader that is skilled and aligned to the school's mission and vision and provides the qualities and qualifications this person must have to effectively run a school and lead the faculty and staff.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>The school commits to following all federal and state rules and regulations with respect to hiring. The application details the hiring of all positions and provides clear expectations. The handbook is provided as an appendix and an organizational chart is provided.</li> </ul>	<ul style="list-style-type: none"> <li>The compensation scale is low compared to other schools within BVSD. Given the high cost of living in the area, attracting and hiring quality staff may be quite difficult.</li> <li>Application lacks details on how it will hire specialized staff to meet varying needs of students (e.g., special education, ELL).</li> <li>Not sure if this is required, but urge the school to include background checks (including fingerprinting) for their principals and any staff with student contact.</li> </ul>

**Parent and Community Involvement:** This section addresses the roles parent/guardians, community members, and community organizations will play as part of the school community.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>The application does identify and articulate a volunteer program.</li> </ul>	<p>The Governance structure does not seem to open opportunities for significant parental involvement. Further, there is no evidence of formal community partnerships, only outreach efforts. The application is silent on how parents have been involved in the charter application process. It comes across as a Charter Management Organization(CMO)-directed venture, without parental input.</p>

**Enrollment Policy:** This section explains how students who want to attend the school will be admitted and enrolled, and how the school manages the process once students are interested in attending the school.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>The application details the enrollment process, including the school's proposed lottery system, priority system, and commitment to enrolling students regardless of race, creed, color, sex, national origin, religion,</li> </ul>	<ul style="list-style-type: none"> <li>The application does not speak to accommodations for at-risk and minority communities in the enrollment process. In the interview, it sounded as if the school will have access to translators. This, however, may not be enough to "open" to all students. In the absence of targeted and careful recruiting, it is less likely that the school will attract a diverse student population. With</li> </ul>

<p>sexual orientation, ancestry, disability or need for special education services.</p> <ul style="list-style-type: none"> <li>● In the interview, the staff stated that they are purposefully not building huge campuses because they wanted a smaller, intimate setting.</li> <li>● In the interview, the staff stated they were open to talking with the district about participating in the open enrollment process like other charter schools. Currently they self-manage their own lottery process.</li> </ul>	<p>sibling preferences and small class sizes, the initial enrollment will likely be difficult to change or significantly diversify over time -- meaning that the “opening” class matters for inclusion.</p> <ul style="list-style-type: none"> <li>● The application states that students who have been suspended from another school will not be admitted. Even if this protected information was obtained, such a restriction is not allowed under statute.</li> <li>● Concerns that the practice of annual re-enrollment will discourage at-risk families from continuing in the school – or students being inadvertently dropped because a family missed a notification.</li> </ul>
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**Transportation:** This section addresses whether the school plans to offer any transportation services to students and if not, describes how students’ transportation needs will be met without transportation services.

**Food Service:** This section addresses whether the school plans to offer service to its students.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>● In the interview, staff indicated that they would be open to discussing strategies for transportation and food services.</li> </ul>	<ul style="list-style-type: none"> <li>● Without offering transportation or participating in the National School Lunch Program, DAC has concerns that this will discourage families in poverty from participating in the school.</li> </ul>

**Facilities:** This section provides information on the school’s short and long-term facility plans. If the founding committee has not already identified a definite school facility, the committee has identified at least two prospective facility sites.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>● Awarded a federal start up grant (\$600k).</li> </ul>	<ul style="list-style-type: none"> <li>● The timeline for constructing a site seems unrealistic given zoning, permitting, codes and construction time typical in Boulder County. The facility plan is more of a vision than a concrete plan. A facility is critical before moving forward. DAC recommends that at minimum, a location/facility must be secured, and a master facility plan created, along with a budget that is aligned to the facility plan before the school is approved to move forward. Currently the application does not seem viable to have a school in place by Aug 2019.</li> <li>● The staff shared that their Douglas County school had problems with enrollment because they had to move from a temporary to a permanent location. To avoid disruption for students, a viable facility plan should be prioritized and a temporary building should be avoided (if possible).</li> </ul>

**Waivers:** This section includes statements acknowledging a commitment to comply with all laws and policies that are not waived and a list of proposed state and district waivers. The requested waivers should match the proposed autonomy, school mission and vision, goals, operations, governance, and employment relationships of the proposed charter school. In addition, the school should acknowledge if they will accept automatic statutory and policy waivers, or if the school plans on taking the automatic state waivers.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>In the interview, the school staff stated that they found most of the policies were agreeable but not written in charter friendly terminology (e.g., granting superintendent final decision making authority).</li> </ul>	<ul style="list-style-type: none"> <li>The replacement plans for the more than 60 BVSD policies are vague. At a minimum, clarify which of the policies need language to be tweaked (i.e., replacing superintendent with charter director) and which truly need a replacement plan. Until the DAC has a clearer understanding of where the school stands on the waivers, this section of the application is difficult to thoroughly evaluate and review.</li> </ul>

**Serving Students with Special Needs & At-Risk:** This section addresses how the school will meet the needs of a variety of “special needs” students who may enroll at the school. Specific research-based instructional programs, practices and strategies should be employed to produce a continuum of services to help ensure academic success for all students that is supported by good assessments.

Strengths	Concerns/Remaining Questions
<ul style="list-style-type: none"> <li>The school expresses a commitment to serve all students who are willing to work hard to be successful in the program. The school purports to have the same vision for exceptional students as other students. The school is committed to FAPE and acknowledges the mandates of support for students with disabilities, IDEA, 504's ADA and the Colorado Exceptional Children's Act. The application identifies a 4-Tier MTSS Academic Support System.</li> <li>In the interview, school staff stated that they were open to an enrollment preference for diverse populations.</li> </ul>	<ul style="list-style-type: none"> <li>In the interview, the staff said that their general approach works well for a diverse population of students, including FRL, special education, Gifted, and ELL students. However, no data has been provided to verify the claim, particularly from the other schools in the network.</li> <li>From the application and the interview, it was stated that the numbers for special populations were too small to report on. Given the number of years that the Golden campus has been open, it seems reasonable that the school could aggregate students by grade levels or over time to give an early analysis of their success rates with diverse populations.</li> <li>Particular concerns about ELD programming. The application states that ELL students will not move on until they have thoroughly learned a topic. This could be a strength to ensure academic mastery, but it could also be used as a way to hold students back. No mention of separate time for English language development. The application -- and statements in the interview -- often conflated the needs of ELL students and students with IEPs. Both populations of students require different kinds of interventions. In addition, it is a problematic position for educators to state that emerging bilingual students have the same needs as students with learning disabilities.</li> </ul>

The DAC did not have comments pertaining to the other sections (e.g., budget, insurance) and defers to the BVSD superintendent and staff review.



**Appendix A: DAC Subcommittee for Charter Application Review**

Name	School
Ruben Anguiano	Casey Middle, Pioneer Elementary
Jennifer Biegen	Lafayette Elementary School
Amanda Brown	Community Montessori Elementary School
Lisa Medler, Subcommittee Chair	Fairview High School
Nicole Rajpal	Foothill Elementary School
Karla Scornavacco	Horizons Elementary School
Teegan Sheanin	Meadowlark K-8
Anna Siepman	Fireside Elementary
Terri Wilson	University Elementary School

Special thanks to Tom Weston for providing expert guidance on the charter school process and to the Ascent Classical Academy staff that attended the December 17 interview.