



Delta Keys Charter
A K-12 Charter School Petition

Submitted to New Jerusalem Elementary School District

Superintendent

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OVERVIEW

Renewal Criteria

Delta Keys Charter (hereon referred to as Delta Keys), serves as an alternative school with Dashboard Alternative School Status. Delta Keys meets the “Other Alternative School Category” per CDE.

Other Alternative Schools

Other alternative schools serve high-risk youth, but are not explicitly required to do so in the *EC*. These include: (1) alternative schools of choice and (2) charter schools that serve high-risk students. These schools must have an **unduplicated** count of at least 70 percent of the school's cumulative enrollment (upon first entry to the school) comprised of high-risk student groups to be eligible for DASS. The high-risk groups include the following:

- Expelled (*EC* Section 48925[b]) including situations in which enforcement of the expulsion order was suspended (*EC* Section 48917)
- Suspended (*EC* Section 48925[d]) more than 10 days in a school year
- Wards of the Court (*Welfare and Institution Code [WIC]* Section 601 or 602) or dependents of the court (*WIC* Section 300 or 654)
- Pregnant and/or Parenting Youth
- Recovered Dropouts – State Board of Education (SBE) defines recovered dropouts based on *EC* Section 52052.3(b) as students who: (1) are designated as dropouts pursuant to the exit and withdraw codes in the California Longitudinal Pupil Achievement Data System (CALPADS), or (2) left school and were not enrolled in a school for a period of 180 days
- Habitually Truant (*EC* Section 48262) or Habitually Insubordinate and Disorderly whose attendance at the school is directed by a school attendance review board or probation officer (*EC* Section 48263)
- Retained more than once in kindergarten through grade eight
- Students who are credit deficient (i.e., students who are one semester or more behind in the credits required to graduate on-time, per grade level, from the enrolling school’s credit requirements)
- Students with a gap in enrollment (i.e., students who have not been in any school during the 45 days prior to enrollment in the current school, where the 45 days does not include non-instructional days such as summer break, holiday break, off-track, and other days when a school is closed)
- Students with high level transiency (i.e., students who have been enrolled in more than two schools during the past academic year or have changed secondary schools more than two times since entering high school)
- Foster Youth (*EC* Section 42238.01[b])
- Homeless Youth

EC Section 47607(c)(7) requires a chartering authority to consider a DASS school's performance on the Dashboard (all performance indicators and local indicators) as well as on “alternative metrics.” These

alternative metrics are to be mutually determined by a charter school and its chartering authorities during the first year of the charter school's charter term.

KEYS is dedicated to serving and educating at-risk students. Recruitment of students and referrals from surrounding high schools as well as intake interviews help identify strategies to educate at-risk students.

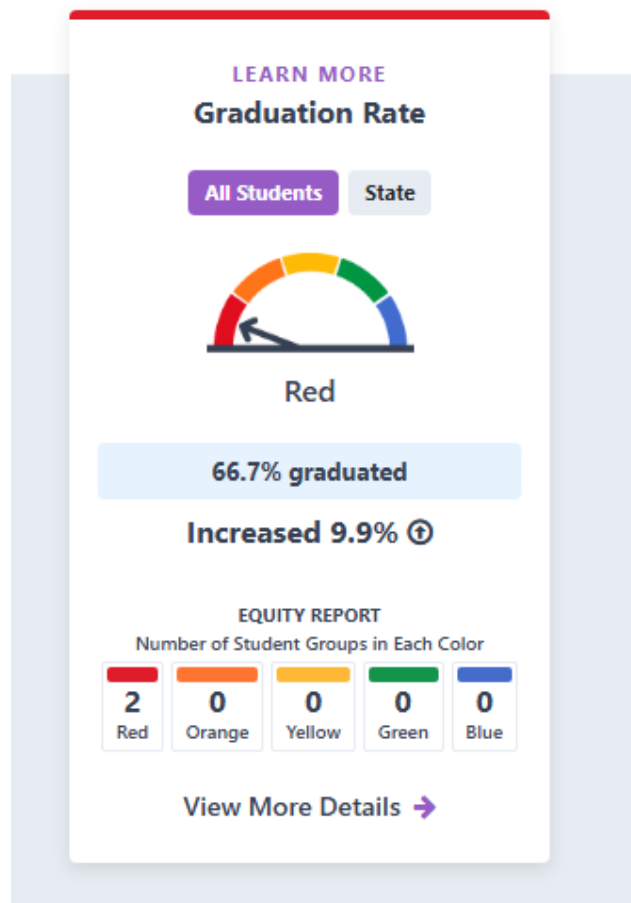
Alternative Metrics

Delta Keys in conjunction with the superintendent of NJESD have established the following alternative metrics:

1. Evaluation of student progress. Student progress as demonstrated by credits earned in the Keys program. This can be shown by graduation for eligible seniors or progress towards diploma for students with projected additional semesters.
2. Demonstrating need for the program. Delta Keys fills a need for at risk students needing credit recovery. This can be evidenced by enrollment and DASS certification.
3. Parent and Family Engagement.
4. Access to Supports and Broad Course of Study

Evidence

Delta Keys meets the needs of a diverse set of learners needing a flexible learning environment. Independent study curriculum allows students the ability to work fully remotely, including synchronous instruction opportunities and tutoring. Delta Keys also offers opportunities for in-person synchronous instruction, tutoring and enrichment. Our student population has seen increased growth and students are excited to engage in events, activities and academics in a personalized learning plan. We are continuing to increase our class offerings, enrichment, synchronous instruction and events to increase engagement and college and career readiness. Delta Keys is poised to grow and offer expanded opportunities for college and career readiness, academic achievement and opportunities for 21st century learners.



STANDARD MET

Parent and Family Engagement

This measure addresses Parent and Family Engagement, including how an LEA builds relationships between school staff and families, builds partnerships for student outcomes and seeks input for decision-making.

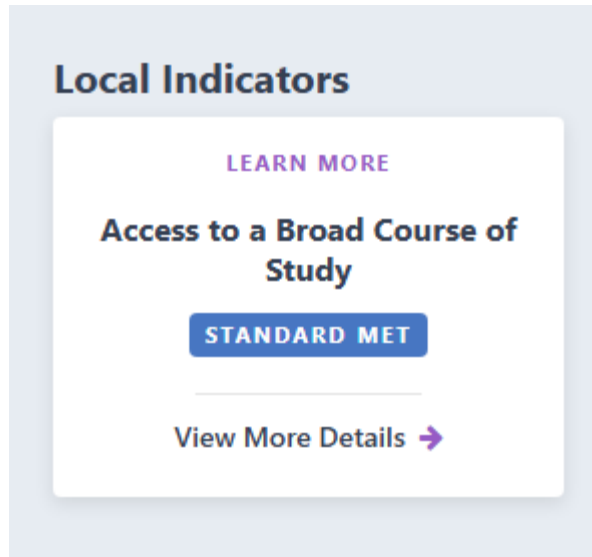
[+ View More Information](#)

STANDARD MET

Local Climate Survey

This measure addresses information regarding the school environment based on a local climate survey administered every other year on the topics of school safety and connectedness.

[Family Climate Survey \(1\).pdf](#)



NWEA growth data is an impactful data source for Delta Keys because many students join the program at different points in their high school career and may state exams after only a short enrollment period. NWEA growth data is a valuable insight to student growth and achievement while in the program.

[Keys math.PNG](#)

[Keys reading.PNG](#)

Delta Keys Charter Declarations

1. Delta Keys Charter affirms the following:
2. The school shall be **nonsectarian** in its:
 - a. Programs and offerings
 - b. Admission policies and procedures
 - c. Employment practices
 - d. All other operations that are subject to the laws governing public schools
3. The school shall **not charge tuition**.
4. The school shall **not discriminate** against any pupil based on disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic as defined under California Penal Code Section 422.55.
5. KEYS will not restrict or determine admission based on where a student or legal guardian lives and is committed to enrolling students impacted by school conversions equally and fairly.
6. The charter school shall **admit all pupils who wish to attend**, subject to capacity limitations.

7. The school shall **comply with all applicable federal, state, and local laws** governing charter schools.
8. The school will collaborate with the district to fulfill all oversight obligations, including compliance with legal requirements, participation in requested meetings, submission of statutory fiscal reports, and adherence to all applicable protocols.

A. Educational Program

1. Target Populations and Community Need

Delta Keys (KEYS) is a k-12 school based in San Joaquin County and authorized by New Jerusalem Elementary School District. KEYS intends to serve students in grades k-12 in San Joaquin County as well as adjacent counties.

KEYS offers

Delta Keys (KEYS) will recognize the value of each student, shall strive to inspire students to learn and grow to their potential by:

- *Creating and delivering an innovative, high quality State Standards-focused educational program through a positive learning experience*
- *Augmenting independent study with academic, personal enrichment, and remediation classes*
- *Working in partnership with the home and community to meet the individual needs of the students; and,*
- *Developing the learning and social skills necessary for maximizing lifelong learning potential that elicits young people's innate love of learning, builds self-confidence, and prepares students for future educational paths and career pursuits.*

Vision Statement

Delta Charter Schools, recognizing the intrinsic value of each student, are committed to providing a quality, diverse education in a personalized, safe, and supportive learning environment which inspires students to learn and grow to their potential.

2. Attendance

School Year and Academic Calendar

KEYS operates on a traditional school calendar and utilizes a 180-day instructional year and minute requirements pursuant to EC 47612.5(a)(1)(A)-(D). Extended school year is offered as required for qualifying students and a summer credit recovery option is offered based on student needs.

All students are required to attend daily asynchronous instruction but may also access synchronous instruction, tutoring, enrichment and/or lab activities virtually via zoom or in the on-site resource center located on the district site. A traditional master schedule is not used for asynchronous coursework, but each student has a matriculation plan detailing the course of study for the academic year, credits already earned and credits required to graduate.

Students not meeting attendance expectations are given tiered reengagement support. If reengagement does not result in required participation pursuant to Education Code Section 51747.5 and the terms of the master agreement, an evaluation conference is held to determine if independent study placement is appropriate or if the student would benefit from an in-person learning model.

Enrollment Projections

2024-2025	2025-2026	2025-2026
121	122	125

Delta Keys has experienced an increase in enrollment. Efforts to offer more college and career options, establishing school membership with NCAA and increased enrichment coupled with the increase in demand for virtual and independent study programs have KEYS poised for growth. As of December 2024, KEYS has met the 2024-2025 enrollment projection.

3. What it means to be an Educated Person in the 21st Century

Charter school law provides opportunities for teachers, parents, students and community members, all of education's stakeholders, to establish and maintain schools that operate independently from the confines of existing school structure and restrictive state regulations, to accomplish the following (EC 47601):

- Improve student learning;
- Increase learning opportunities for all students, with special emphasis on expanded learning experiences for students who are identified as academically low achieving;
- Encourage the use of different and innovative teaching methods;
- Provide parents and students with expanded choices in the types of educational opportunities that are available within the public school system;
- Hold the school accountable for meeting measurable student outcomes, and provide the school with a method to change from rule-based to performance-based accountability systems; and,
- Provide vigorous competition within the public school system to stimulate continual improvements in all public schools.

It is the intention of this charter to respond proactively to these goals by providing a responsible balance between the practical and the creative, the theoretical and the applied, and the traditional and the Innovative. Through highly interactive curricula incorporating the best and most up-to-date teaching and learning practices available, students who participate in KEYS's educational program will become fully empowered learners with the skills needed for life success, in other words an educated person for the 21st century. It is the goal of KEYS to enable students to become self-motivated, competent, and lifelong learners. KEYS will principally be a personalized learning school serving the students and residents of San Joaquin and surrounding counties. This charter authorizes the operation of KEYS located on the NJESD campus.

4. How Learning Best Occurs/Instructional Design, including subgroup program Curriculum and Instructional Design

KEYS, in effort to provide all students with an effective customized education, makes available a variety of learning environments. State frameworks and content standards are the foundation for curriculum and instruction. A credentialed teacher, working in partnership with the parent/guardian and student,

customizes the independent study and site-based (where applicable) instruction through regular consultation, goal setting, coaching, oversight and access to resources to provide excellent instruction.

A wide variety of standards-based materials, textbooks, and online instruction are drawn from to match the student's learning styles and academic needs. California standards-based materials are often supplemented with district approved curriculum choices to accommodate a student's complex learning needs. KEYS uses a strong, standards-based core curriculum for all content areas. Both staff and students use technology to effectively communicate, diagnose student needs, and show evidence of learning objectives achievement based on state standards. Students at KEYS are given numerous opportunities to obtain the skills necessary to be successful for today and tomorrow. Technology has become an essential method for improving teaching, learning and communication throughout our district and community.

Plan for Students Who Are Academically Low Achieving

KEYS meets the educational needs of academically low achieving students through numerous programs and state adopted instructional options. Students who need these interventions are identified by the Student Study Team (SST) process through one or more of the following methods: standardized test scores, instructional software assessment scores, teacher observations, curriculum-based measurement, academic grades, and other school-approved screening criteria.

Plan for Students Who Are Academically High Achieving

KEYS meets the educational needs of academically high achieving students through programs and instructional strategies including but not limited to: Self-paced instructional software, community college early start program, accelerated graduation, and differentiated instruction. These students are identified through one or more of the following methods: Standardized test scores, instructional software assessments scores, teacher observation and assessments, academic grades, and other school approved screening criteria.

Plan for English Learners

KEYS is committed to identifying and supporting English Language Learners (ELLs) in compliance with state and federal regulations in effort to attract a diverse applicant pool and achieve racial and ethnic balance in student enrollment.

Identification of English Language Learners:

KEYS determines ELL status using two methods:

1. **New to California Public Schools:** If a student is enrolling in a California public school for the first time, the school reviews the Home Language Survey completed during enrollment. If responses indicate a primary language other than English, the student takes the Initial English Language Proficiency Assessment for California (ELPAC) as required by law. Students identified as English Learners (ELs) are assigned an English Language Development (ELD) Specialist and receive Designated and Integrated ELD services.

2. **Previously Enrolled in a California Public School:** If a student has prior enrollment in a California public school, KEYS verifies ELL status through the California Longitudinal Pupil Achievement Data System (CALPADS). Identified ELs are assigned ELD Specialists and provided with Designated and Integrated ELD services.

Support for English Language Learners

Identified ELs receive instruction from a qualified teacher using a specialized curriculum aligned with the California Education Code. KEYS ensures students develop English proficiency while accessing grade-level content through comprehensive ELD support.

Plan for Special Education

Overview

KEYS complies with all state and federal laws regarding students with disabilities, including Section 504, the ADA, and IDEA.

As an independent LEA and member of the El Dorado County Charter SELPA, the Charter School receives direct state and federal funding and ensures all students with disabilities receive services per their IEPs. The Charter is responsible for Section 504 and ADA compliance, with fully accessible facilities. KEYS is responsible for providing special education instruction and related services to the students enrolled in the school regardless of the student's district of residence.

Services for Students under IDEA

The Charter School provides special education and related services per IDEA and the Education Code. With an MOU with El Dorado County Charter SELPA, it has successfully served students with special needs. The school has policies for identifying and serving students, managing records, and maintaining confidentiality. It handles referrals, assessments, case management, IEP development, and implementation.

Staffing

Special education services are provided by qualified personnel holding appropriate California credentials to serve students with disabilities. The school hires, trains, and employs credentialed special education teachers, paraprofessionals, and specialists in compliance with all applicable laws. Staff receive ongoing training to ensure high-quality instruction and support for students with disabilities.

Response to Requests

The Charter School promptly handles requests related to assessments, services, complaints, IEP meetings, and due process matters.

Identification and Referral

The school identifies and refers students with potential disabilities in compliance with SELPA policies. General education resources are considered before referral. The school follows child-find procedures to assess eligibility when needed.

Additionally, KEYS will maintain a trained Student Study Team (SST) staff. This SST process provides a venue for parents, teachers, key school personnel, or other interested persons to systematically review and make suggestions for student performance and assist with interventions and concerns. The referrals are forwarded to a designated SST contact at KEYS.

Assessments

Assessments comply with IDEA and applicable laws. The Charter School determines necessary assessments and obtains parent consent.

IEP Meetings and Implementation

The Charter School arranges IEP meetings with appropriate team members per state and federal laws. It ensures timely progress reports, home-school communication, and the provision of curriculum, materials, and accommodations.

Transfers and Non-Public Placements

The Charter School follows Education Code Section 56325 for student transfers, ensuring service continuity. It oversees non-public schools and agencies providing special education services as needed.

Notifying the Student's District of Residence

The Charter School will employ a process to notify the student's district or residence when a special education student enrolls, becomes eligible, or ineligible, or when a student leaves the charter.

Non-Discrimination

No student is denied admission or counseled out due to disability or special education needs.

Parent/Guardian Concerns and Due Process

The school has procedures for addressing parent concerns and legal matters, responding to investigations by agencies such as the California Department of Education and the Office for Civil Rights.

Instructional Process

Upon enrollment, student information is reviewed by the Special Education Coordinator. Students are processed through SEIS, and teachers collaborate with case managers/specialists to implement instructional strategies aligned with IEP goals.

SELPA Participation

KEYS is within the boundaries of the El Dorado County SELPA, and the school shall be an active member and shall abide by the policies and procedures outlined in the SELPA adopted contract. Additionally, KEYS will remain fiscally responsible for its share of contributions to SELPA general funds. Furthermore, KEYS agrees to notify the SELPA one year and one day in advance of its plan to leave the SELPA to participate in another SELPA.

Professional Development

KEYS seeks out professional opportunities which emphasize both content and pedagogy, help teachers develop leadership roles, and include contact with practitioners and researchers as well as other teachers. The KEYS administrative team develops relevant training specific to the needs and goals of KEYS for designated professional development days and the NJESD district also provides required and relevant training for staff. In addition to specific training opportunities, programs which put teachers into contact with community resources will be pursued.

5. Materials, Including Technology

Curriculum is aligned with state standards and school chrome books have secure browsers for state assessments and measures of academic progress NWEA testing. Students are given access to all curriculum and are assigned a district google account which can sign into chrome books onsite and school chrome books checked out to students. Students are given access to supplemental curriculum and onsite enrichment to enhance and personalize each student's educational experience. All students are given the option to check out a school chrome book and families have the option to purchase insurance for the chrome book. Plans for adaptive technology for students with individual education plans are created in the IEP team meeting.

6. Annual Goals

The linked table outlines how the goals and strategies from the Delta Keys Schoolwide Action Plan align with the Local Control Accountability Plan (LCAP) goals, actions, evidence, and monitoring strategies based on the priorities identified in EC Section 52060(d).

[Delta Keys Charter School Wide Action Plan January 3, 2025.pdf](#)

7. Description Requirements for Charter Schools Serving High School Students (EC 47605(b)(5)(A))

Families are advised in the enrollment meeting about the courses offered and transferability with other institutions. KEYS is WASC accredited and requires 145 credits to graduate for general ed students and 130 credits for students meeting eligibility for AB 167 requirements. Graduation requirements are updated when necessary to remain in compliance with State requirements. All students receive a matriculation plan detailing the students acquired, in progress and planned credits for graduation from KEYS. Students are offered a broad course of study through coursework offered at Delta Keys and community college coursework in the College Early Start program and Dual Enrollment. FAFSA workshops are offered by the academic counselor virtually. There are also workshops virtually and in person in conjunction with the school and local community colleges. Individual appointments are also available for students and there is information at senior information and Round Up events.

Gen Ed Student Graduation Requirements

Subject	Credits
English	30
Mathematics (must include Algebra 1)	20
Physical Education	20
Life Science	10
Physical Science	10
CTE/VPA/World Language	10
Health	5
World History	10
US History	10
Government and Economics	10
Personal Finance	5
Careers	5

AB 167 Student Requirements

Subject	Credits
English	30
Mathematics (must include Algebra 1)	20
Physical Education	20
Life Science	10
Physical Science	10
CTE/VPA/World Language	10
World History	10
US History	10
Government and Economics	10

B. Measurable Student Outcomes

“Student outcomes” means the extent to which all students of KEYS demonstrate that they have attained

the skills, knowledge and attributes specified as goals in the school’s educational program. Student outcomes shall include outcomes that address increases in student academic achievement both schoolwide and for all groups of students served by the charter school, as that term is defined in subparagraph (B) of paragraph (3) of subdivision (a) of Section 47607. The student outcomes shall align with the state priorities, as described in subdivision (d) of Section 52060, that apply for the grade levels served, or the nature of the program operated, by the charter school. Education Code Section 47605(b)(5)(B).

In keeping with the educational philosophy of KEYS, measurable student outcome goals for all students are:

- All students will progress towards achieving the state content standards at a proficient level or above.
- All students will progress towards achieving at the proficient level as measured by the regularly administered district benchmark assessments.
- English Learner students will advance one fluency level as measured by the annual ELPAC and local ELD benchmark assessments.
- All students graduating from the charter will exhibit the following:

Core Academic Skills

Appropriate age or grade-level mastery of:

- Language Arts
- Mathematics
- Science
- History/Social Studies

College and Career Readiness Skills/ 21st Century Skills

- Critical thinking skills
- Ability to effectively use technology
- Creative expression through various forms of the arts
- Knowledge of pertinent issues of health and the development of physical fitness
- Career Education

Academic Performance

KEYS shall meet or exceed its annual growth target as set by the state, both school wide and for all significant student subgroups. The plan for achieving future growth targets includes the following elements:

1. Fully implement a benchmark assessment program.
2. Utilize English Language Development (ELD) benchmark assessments to monitor fluency.
3. Continue to strengthen standards-based instruction through professional development opportunities.
4. Continue to identify students for intervention and to monitor their progress based upon their achievement

Alignment of LCAP, annual goals, and schoolwide action plan: [Delta Keys Charter School Wide Action Plan January 3, 2025.pdf](#)

C. Student Progress Measurement

Methods of Assessment

Student progress in meeting the desired student outcomes is measured and evaluated through a variety of assessment tools as outlined below.

1. State mandated assessments - Students will be assessed annually with all state mandated assessments and any other statewide standards or student assessments applicable to students

in non-charter public schools, including, but not limited to, the California English Language Development Test, and the physical performance test.

2. Local assessments - Schools in the district will conduct local assessments that may include:

- a. District Benchmark Assessments
- b. Observational Survey of Early Literacy Learning (K-1)
- c. Reading fluency assessment through running records (K-5)
- d. Basic Reading Inventory
- e. Curriculum based measurement
- f. Northwest Evaluation Association's solutions Measures of Academic Progress Testing
- g. Performance-based assessments: foreign language, dance, art, music, physical fitness, etc.
- h. Portfolios
- i. Informal and formal personalized learning plan conferences throughout the year

Use and Reporting of Data

Data on student achievement is collected, analyzed and reported to school staff, parents and guardians through the following measures.

1. **Methods of collecting data:**

- a. Longitudinal Assessment Reporting System data management software to collect data from state assessments
- b. Data reports provided by the state as part of the California Assessment System
- c. Teacher collected data: performance on daily work, teacher observations, homework, portfolios, projects and student attendance
- d. Northwest Evaluation Association's data

2. **Forums for analyzing data:**

- a. Teacher analysis and reflection on collected student data
- b. Grade level meetings
- c. Parent-teacher conferences
- d. Staff Meetings
- e. Intervention Teams
- f. Student Study Teams
- g. Administrative Meetings
- h. School Board Meetings

3. **Means of reporting data:**

- a. Student Reports on the California Tests
- b. Standardized test results
- c. Parent conferences
- d. Media reporting
- e. Board meetings
- f. School Accountability Report Cards
- g. CA Dashboard

School staff and advisory committees utilize the above collected and reported data continuously to monitor and improve the charter school's educational program so that the stated measurable student outcomes can be attained.

D. Governance

New Jerusalem Elementary School District Board of Trustees

The Charter School will operate independently as a Local Education Agency (LEA) and be governed by the NJESD Board of Trustees ("Board") in accordance with its adopted by laws for the charter school. The Board meets on a regular basis (e.g., monthly during the school year and as appropriate at other times). All duties and operations regarding the Charter School shall be considered a duty of the District Board unless otherwise delegated by the Board. The responsibilities of the Board as further outlined in the bylaws include but are not limited to:

- Uphold the Vision of the School.
- Oversee the implementation of the School's charter.
- Provide notice and hold meetings in compliance with the Brown Act.
- Create and implement a Yearlong Strategic Plan for the School.
- Ensure compliance with applicable law such as the Public Records Act and policies such as Conflict of Interest.
- Provide oversight of instructional programs and materials.
- Approve and have oversight of student and parent policies including but not limited to recruitment of staff, admissions, disciplinary policies including suspension and expulsion.
- Monitor management of School liabilities, insurance, health, safety and risk-related matters.
- Receive and review quarterly financial reports and the yearly financial audit.
- Work with the Charter School Administration to set goals for the upcoming school year.
- Hire, supervise, evaluate, discipline, and dismissal of the Director of Virtual Programs.
- Hire, promote, discipline and dismiss all employees of the Charter School after consideration of a recommendation by the Director of Virtual Programs.
- Approve all contractual agreements, purchase orders, pay warrants, and requisitions.
- Monitor the budget and the Charter School's fiscal practices, including the receipt of grants and donations and approve and ratify the final budget of KEYS.
- KEYS will operate in alignment with NJESD's oversight practices.

Board Composition and Selection

The Governing Board shall consist of three members (President, Clerk, and Board Member) whose terms shall be staggered so that as nearly as practicable, one half of the members shall be elected in each year in which the Board's elections are regularly held.

The term of office for Board members elected in regular elections shall be four years, commencing on the second Friday in December following their election.

Board members whose terms have expired shall continue to discharge the duties of office until their successors have qualified by taking the oath of office.

If a regularly scheduled Board election date is changed due to consolidation with a statewide or municipal general election, the term of incumbent Board members shall be extended to align with the next applicable election.

Board training occurs annually on various topics, most notably the Brown Act, and is scheduled by the board secretary as needed. A copy of [all board policies and bylaws](#) are available by clicking on the provided link.

Parent Involvement

KEYS values parental involvement and parents are a critical part of our stakeholder team. KEYS elicit parent feedback via climate surveys, open discussion forums, board meetings, DELAC meetings, community events, etc. Round Up events are hosted at least three times per year in addition to learning period meetings. There are also FAFSA workshops, college and career awareness workshops, and opportunities to meet counseling, administration and teachers.

Director of Virtual Programs

The responsibilities of the Director of Virtual Programs or his/her designee may include, but are not limited to, the following:

- Attend District Administrative meetings as necessary and maintain contact with District.
- Make recommendations to the Board regarding the hiring, discipline, supervision, evaluation and dismissal of all employees of the School.
- Provide timely performance evaluations of all School employees and report all potential employee disciplinary actions to the Board.
- Communicate with School legal counsel and any outside consultants.
- Stay abreast of school laws and regulations.
- Participate in the dispute resolution procedure and the complaint procedure when necessary.
- Establish and execute enrollment procedures and be the custodian of records in conjunction with enrollment team.
- Provide all necessary financial reports as required for proper ADA reporting.
- Administer the budget in accordance with generally accepted accounting principles.
- Work with the Chief Business Officer to present a quarterly financial report to the Board.
- Aid and coordination to the faculty in the development of curriculum.
- Oversee parent/student/teacher relations.
- Attend IEP meetings when necessary.
- Supervise student disciplinary matters when necessary.
- Coordinate the administration of standardized testing with the Director of Educational Services.
- Plan and coordinate all activities related to enrollment with Director of enrollment.
- Attend Board meetings as the charter representative for KEYS /Keys.

- Establish procedures designed to carry out Charter Board policies.

The NJESD provides all appropriate support services to contribute to the successful attainment of the education goals of KEYS. In general, direct support costs of personnel, financial, legal, purchasing, and facility services shall be budgeted for and paid by revenue generated by student average daily attendance as reported by KEYS and included in the overall budget of the NJESD. The dollar amounts for direct services will be determined by the NJESD Superintendent, whose decision, subject to Governing Board ratification shall be final in all cases and under all circumstances.

Delta Keys Charter (KEYS) will continue to operate under the New Jerusalem Elementary School District (NJESD) for legal services, risk management, and all related support services. NJESD will secure and maintain all required insurance coverage and minimum liability protections for KEYS, in accordance with the requirements set forth by the district's insurance provider or joint powers authority.

E. Employee Qualifications

KEYS believes that the quality of professional staff determines the quality of education offered at the school. It is therefore the responsibility of the administration to locate and recruit the best candidates to meet the school's educational needs.

The KEYS teaching staff must fulfill their individual responsibilities and work in concert with the other members of the educational team.

The administration will be responsible for advertising available jobs and soliciting applications from qualified candidates. A search committee of administrators, and when appropriate, teachers and/or outside experts, may be used to screen all applicants and make recommendations for the candidate pool and possibly interview a small subset of candidates.

KEYS is committed to retaining/employing individuals who are best qualified for the job without regard to race, sex, religion, or handicap to the job. KEYS will adhere to relevant California and federal laws in its hiring practices. It is the administration's responsibility to obtain a criminal history check of all school employees and to obtain proof of citizenship or eligible alien status.

The NJESD Board shall consider and determine whether to act on the Director of Virtual Program's recommendations regarding hiring of staff and their placement on the salary schedule. The figure for initial salary shall depend on the academic degrees of the employee, his/her previous professional experience, and/or his/her expertise as appropriate to the position.

Administrators are preferred to hold an appropriate California Administrative Services Credential. The school may request the Department of Education to expedite the certification of persons qualified to teach by education and experience as needed. Beyond the guarantee of professional preparation offered by certification, we will seek professional staff that agree with and committed to the mission, goals, and educational approach of the school, as outlined in this document.

To continue being creative and flexible in providing an optimal learning environment, the District maintains the following standards:

Director of Virtual Programs

The Director of Virtual Programs will provide leadership for KEYS. The Director will hold a master's degree in Education or a related field. Additionally, a valid California Administrative Services Credential is preferred but not required.

Principal/Administrator

The Principal and any administrator will provide leadership under the direction of the Director. The principal will hold a bachelor's degree and a master's degree in education is preferred. The Principal and any administrator will hold all required credentials. A valid California Administrative Services Credential is preferred but not required. The Principal shall have a criminal background check performed pursuant to Education Code Section 44830.1.

Counselor

The Counselor must hold a valid California Student Personnel Services Credential, or be enrolled in a student personnel services credentialing program with the ability to obtain a California Student Personnel Services Intern Credential. The Counselors shall have a criminal background check performed pursuant to Education Code Section 44830.1.

Teachers/Educational Coordinators

Classroom teachers and education coordinators teaching core subjects must hold valid California teaching credentials. They are employed by NJESD and are responsible to the Principal and Director. Teachers shall have a criminal background check performed pursuant to Education Code section 44830.1.

Classified Personnel

All classified personnel must meet the qualifications and standards established for employment and are responsible to the Principal and Director. All classified employees shall have a criminal background check performed pursuant to Education Code Section 44830.1.

KEYS will maintain and/or expand existing NJESD standards and abide by relevant statutes and regulations for all those who work with students.

Staff Evaluation

As part of the evaluation procedure, the Superintendent of NJESD specifies clearly defined criteria for performance review. These criteria include:

- Commitment to the KEYS mission and goals
- High level of professionalism
- High level of accomplishment
- Effective participation on the KEYS team
- Special contributions by the KEYS staff to the school's program will also be an element in the performance review.

- Performance evaluations will be in accordance with established board policy

Professional Development Opportunities

KEYS seeks out professional opportunities which emphasize both content and pedagogy, help teachers develop leadership roles, and include contact with practitioners and researchers as well as other teachers. The KEYS administrative team develops relevant training specific to the needs and goals of KEYS for designated professional development days and the NJESD district also provides required and relevant training for staff. In addition to specific training opportunities, programs which put teachers into contact with community resources will be pursued.

F. Health and Safety Procedures

- The procedures that the school will follow to ensure the health and safety of students shall include compliance with the criminal background check requirements described in Sections 44830.1, 45122.1, and 44237 of the Education Code [47605(b)(5)(F)].
- KEYS will ensure the safety of the students and staff by complying with all applicable state and federal safety laws.
- All immunization and health-related issues for both employees and students in KEYS will be addressed in accordance with existing Board policy and applicable law.
- The NJESD shall handle the actual hiring and other employment-related matters of KEYS.
- The NJESD shall adhere to existing state laws regarding fingerprinting and TB testing of employees.
- KEYS shall adhere to existing Board policy pertaining to the safety and health of all employees and students. KEYS will follow the district safety plan.
- KEYS will follow bullying and suicide prevention policies adopted by NJESD.
- KEYS will operate in compliance with the Americans with Disabilities Act.
- NJESD provides mandated training for all employees

Safety Plan

KEYS will implement the full District Safety Plan adopted by the New Jerusalem Elementary School District (NJESD) Board and remain compliant as laws evolve. This plan ensures a secure learning environment through bullying prevention, mental health support, mandated reporting, site assessments, emergency preparedness, threat assessment protocols, standardized responses, incident reporting, and staff training.

Regular site assessments will identify security risks, while emergency plans will cover fires, lockdowns, evacuations, and shelter-in-place scenarios, reinforced through drills and staff training. Threat assessment protocols will help identify and address risks early, and bullying prevention policies will create a safe school climate. A structured incident reporting system will allow students and staff to report concerns confidentially, ensuring prompt responses.

Staff will receive ongoing training in safety protocols (including how to administer CPR, First Aid, EpiPen, AED deliberators), emergency response, de-escalation, and mental health awareness. Clear communication channels will keep students, parents, and staff informed via mass notifications, school websites, and social media.

Mental health resources will support students in distress, with staff trained to recognize and respond appropriately. Collaboration with administrators, teachers, parents, students, and law enforcement will

enhance safety efforts. Regular reviews will ensure the plan adapts to emerging threats and best practices, reinforcing KEYS's commitment to a secure and supportive learning environment.

The full [Safety Plan](#) can be viewed by clicking this link.

G. Racial and Ethnic Balance

KEYS will make every effort to achieve a racial and ethnic balance among its students that is reflective of the general population residing within the territorial jurisdiction of the school district to which the charter petition is submitted. KEYS will include an open enrollment policy [47605(b)(5)(G)]. No student shall be denied admittance to the school based on ethnicity, creed, gender, gender expression, gender identity, national origin, disability, or upon any of the characteristics listed in Education Code Section 220.

KEYS shall be nonsectarian in its programs, admission policies, employment practices, and all other operations, shall not charge tuition and shall not discriminate against any student based on ethnicity, national origin, gender, gender expression, gender identity, disability, or upon any of the characteristics listed in Education Code Section 220.

To attract a diverse population, KEYS use recruitment strategies that include, but not limited to:

- Materials regarding enrollment in languages other than English
- Distribution of materials that reach various racial and ethnic groups represented in San Joaquin County and surrounding counties
- Participation in county events, such as fairs, throughout the community
- Offer flexible programs for students of all ethnicities and cultures
- Provide a robust ELD program for students
- Offer ESL lessons for parents

H. Admission Requirements

As required by law, admissions preference will be granted to students who are residents of the NJESD. Eligibility for enrollment of NJESD students will always be automatic, subject to statutorily permissible and reasonable rules and regulations, and shall not be adversely affected by non-resident enrollment.

Requirements for Admission

- The student has satisfied all state and local immunizations and physical examination requirements, or has provided a KEYS waiver.
- Completion of the Admissions Package
- Proof of residence in San Joaquin County or an adjacent county
- Approval of the Director of Virtual Programs or designee
- A signed independent study master agreement delineating acknowledgement of, and agreement with, KEYS -specified roles, responsibilities, commitments, and understandings

Admissions Policy for Non-resident Students

Admission of students outside of the regular attendance area will be considered and granted in accordance with the procedures outlined below. Students of families who fail to meet their KEYS obligations may have their enrollment revoked in accordance with administrative regulations. Enrollment of non-resident students in KEYS will exist on a space/capacity-available basis only. Applicants will be considered on a first-come, first-served basis until space/capacity limits are reached as determined by school policy. If more students apply than can be accommodated, admission will be considered based on application postmark date, and lottery; in the event of ties. If necessary, a date will be published to begin accepting admissions forms. Any forms submitted prior to that date will be considered to have been submitted on that date.

Siblings of non-resident students already enrolled in the school will be granted preference. Enrolled students are guaranteed admission the following year, subject to other provisions in this charter. Application forms request the following types of information: student's name; date of birth; grade level; address; names, addresses, and telephone numbers of parents/guardians; names of siblings also applying; student's attendance record; disciplinary records; and a signature verifying that the information is correct and that the parents/guardians are choosing education at KEYS for their student. If there are space/capacity limitations, application forms must be submitted to the school by the annual deadline determined by the KEYS. The Charter School Superintendent will make all decisions concerning the status of student eligibility, with the right of appeal to the NJESD Superintendent. Decisions by the NJESD Superintendent are final.

Selection Process

This section will apply ONLY if enrollment must be capped.

If the number of applicants exceeds the school's enrollment cap, set by each grade level if needed, a random lottery process will be instituted for applicant selection. The lottery process will ensure that the racial, ethnic, and unduplicated pupil balance of KEYS will not be negatively impacted.

- The pool of applicants will be sorted per admissions preferences provided for under statute and listed above (i.e., younger sibling) and by grade level
- Within each grade level, applications will be sorted per these categories, arranged in order of admissions preference
 - returning student
 - sibling of returning student
 - new applicant for space-available admission
- After all grade levels have been completed; names that remain will be placed by preference category, in drawing order, on the school's waiting list. Names are drawn one by one; as each student's name is drawn, that student and applicant siblings are immediately placed in their respective grade levels. In accordance with Education Code sections 49011 and 47605, admission preferences shall not require mandatory volunteer hours as a criterion for admission or continued enrollment.

Admission decisions will be made by the process described above on the date set by KEYS. Parents/Guardians will be informed by mail of each student's admission status, and will have fourteen

calendar days after the postmarked date on the notification to return a signed enrollment registration card for each student offered enrollment, or signed waiting-list applicant card for wait-listed students. If no form is returned within ten days, KEYS will make two attempts to contact the family before the fourteen-day deadline. If no form has been returned by the two-week deadline, the student's admission space or waiting-list order will be given to the next eligible candidate. Parents who will not be available at the home address listed on the application form during the notification period should so notify KEYS personally/by phone and formally in writing, to make alternate arrangements.

Record-keeping

KEYS 2 will maintain student records in keeping with NJESD policies and state and federal statutes applicable to charter schools.

I. Annual Independent Financial Audits

Delta Keys recognizes that transparency, accountability, and compliance are critical to our school's effective operation and governance. An annual independent audit process is a cornerstone of fiscal responsibility and operational integrity.

The annual independent financial audit of the books and records of the Delta Keys school will be conducted in compliance with state and federal laws, including but not limited to the requirements of Education Code Section 47605(b)(c)(5)(I) and 47605(m). The books and records of the Delta Keys School will be kept in accordance with generally accepted accounting principles and as required by applicable provisions within the California Code of Regulations.

The NJESD Board of Trustees will select an independent auditor on behalf of the Delta Keys School based upon assessment of their qualifications, audit experience in school business, references, and cost-effectiveness. The Chief Business Officer will oversee the independent audit.

The independent auditor selected will ensure financial accountability by verifying that all revenues, expenditures, and financial practices comply with state and federal regulations and the school's charter and operational policies, provide a clear picture of the school's financial health, Highlight any financial irregularities, areas of concern, or inefficiencies in financial management and offer actionable recommendations to enhance financial practices and internal control. In accordance with EC41020(h), the auditor will forward the annual audit report to the San Joaquin County Office of Education, the Department of Education, and the State Controller by the 15th of December each year.

New Jerusalem Elementary School District will present the finalized audit report to the governing board. The governing board reviews and approves the audit report during a public meeting, ensuring transparency. Key findings and correction action plans, if any, are shared with the governing board and stakeholders, and an action plan is developed to address identified issues. The Charter School will satisfy any audit deficiencies to the satisfaction of the authorizer.

J. Suspension and Expulsion Procedures

KEYS's Suspension and Expulsion Policy and Procedures are established to promote learning in a safe environment. It may be necessary to suspend or expel a student from regular classroom instruction at times. This policy shall be enforced fairly and consistently among all students.

Any student who is suspended for fewer than 10 days has the right to written notice of charges against them from a school administrator or designee. The notice of charges will include an explanation of any evidence available to the administrator at the time of the notice that supports the charges brought against the student. Suspended students will be given the opportunity to provide a rebuttal to the charges against them through oral or written statements to the administrator or designee.

Any student who is suspended for 10 or more days has the right to timely, written notice of the charges against them and an explanation of their Constitutional rights. Within a timely manner, the student will receive written notice of a Discipline Review Board (DRB) meeting. The DRB will be in front of a neutral officer. The student has the right to bring legal counsel and/or a student advocate. The DRB will be a time for neutral parties employed by the district to hear the evidence from the administrator and rebuttal from the student. Once all evidence has been heard, the neutral parties will decide how to proceed with discipline.

At no time will a student be involuntarily removed from KEYS for any reason unless the parent or guardian has been provided with written notices in the native language of the student's parent or guardian.

A student shall only be suspended or expelled for offenses found in California Education Code section 48900(a)-(r) if the act is related to 1) a school activity, 2) school attendance occurring at KEYS, or 3) a KEYS sponsored event. A student may be suspended or expelled for acts that are enumerated below and related to school activity or attendance that occurs at any time, including, but not limited to:

- While on school grounds.
- While going to or coming from school.
- During, going to, or coming from a school-sponsored activity.

(a) (1) Caused, attempted to cause, or threatened to cause physical injury to another person.

(2) Willfully used force or violence upon the person of another, except in self-defense.

(b) Possessed, sold, or otherwise furnished a firearm, knife, explosive, or other dangerous object, unless, in the case of possession of an object of this type, the pupil had obtained written permission to possess the item from a certificated school employee, which is concurred in by the principal or the designee of the principal.

(c) (1) Unlawfully possessed, used, sold, or otherwise furnished, or been under the influence of, a controlled substance listed in Chapter 2 (commencing with Section 11053) of Division 10 of the Health and Safety Code, an alcoholic beverage, or an intoxicant of any kind.

(2) Pupils who voluntarily disclose their use of a controlled substance, alcohol, or an intoxicant of any kind in order to seek help through services or supports shall not be suspended solely for that disclosure.

(d) Unlawfully offered, arranged, or negotiated to sell a controlled substance listed in Chapter 2 (commencing with Section 11053) of Division 10 of the Health and Safety Code, an alcoholic beverage,

or an intoxicant of any kind, and either sold, delivered, or otherwise furnished to a person another liquid, substance, or material and represented the liquid, substance, or material as a controlled substance, alcoholic beverage, or intoxicant.

(e) Committed or attempted to commit robbery or extortion.

(f) Caused or attempted to cause damage to school property or private property.

(g) Stole or attempted to steal school property or private property.

(h) (1) Possessed or used tobacco, or products containing tobacco or nicotine products, including, but not limited to, cigarettes, cigars, miniature cigars, clove cigarettes, smokeless tobacco, snuff, chew packets, and betel. However, this section does not prohibit the use or possession by a pupil of the pupil's own prescription products.

(2) Pupils who voluntarily disclose their use of a tobacco product in order to seek help through services or supports shall not be suspended solely for that disclosure.

(i) Committed an obscene act or engaged in habitual profanity or vulgarity.

(j) Unlawfully possessed or unlawfully offered, arranged, or negotiated to sell drug paraphernalia, as defined in Section 11014.5 of the Health and Safety Code.

(k) (1) Disrupted school activities or otherwise willfully defied the valid authority of supervisors, teachers, administrators, school officials, or other school personnel engaged in the performance of their duties.

(2) Except as provided in Section 48910, a pupil enrolled in kindergarten or any of grades 1 to 5, inclusive, shall not be suspended for any of the acts specified in paragraph (1), and those acts shall not constitute grounds for a pupil enrolled in kindergarten or any of grades 1 to 12, inclusive, to be recommended for expulsion.

(3) Except as provided in Section 48910, a pupil enrolled in any of grades 6 to 8, inclusive, shall not be suspended for any of the acts specified in paragraph (1). This paragraph is inoperative on July 1, 2029.

(4) Except as provided in Section 48910, commencing July 1, 2024, a pupil enrolled in any of grades 9 to 12, inclusive, shall not be suspended for any of the acts specified in paragraph (1). This paragraph is inoperative on July 1, 2029.

(5) (A) A certificated or classified employee may refer a pupil to school administrators for appropriate and timely in-school interventions or supports from the list of other means of correction specified in subdivision (b) of Section 48900.5 for any of the acts enumerated in paragraph (1).

(B) A school administrator shall, within five business days, document the actions taken pursuant to subparagraph (A) and place that documentation in the pupil's record to be available for access, to the extent permissible under state and federal law, pursuant to Section 49069.7. The school administrator shall, by the end of the fifth business day, also inform the referring certificated or classified employee, verbally or in writing, what actions were taken and, if none, the rationale used for not providing any appropriate or timely in-school interventions or supports.

(l) Knowingly received stolen school property or private property.

(m) Possessed an imitation firearm. As used in this section, "imitation firearm" means a replica of a firearm that is so substantially similar in physical properties to an existing firearm as to lead a reasonable person to conclude that the replica is a firearm.

(n) Committed or attempted to commit a sexual assault as defined in Section 261, 266c, 286, 287, 288, or 289 of, or former Section 288a of, the Penal Code or committed a sexual battery as defined in Section 243.4 of the Penal Code.

(o) Harassed, threatened, or intimidated a pupil who is a complaining witness or a witness in a school disciplinary proceeding for purposes of either preventing that pupil from being a witness or retaliating against that pupil for being a witness, or both.

(p) Unlawfully offered, arranged to sell, negotiated to sell, or sold the prescription drug Soma.

(q) Engaged in, or attempted to engage in, hazing. For purposes of this subdivision, “hazing” means a method of initiation or preinitiation into a pupil organization or body, whether or not the organization or body is officially recognized by an educational institution, that is likely to cause serious bodily injury or personal degradation or disgrace resulting in physical or mental harm to a former, current, or prospective pupil. For purposes of this subdivision, “hazing” does not include athletic events or school-sanctioned events.

(r) Engaged in an act of bullying. For purposes of this subdivision, the following terms have the following meanings:

(1) “Bullying” means any severe or pervasive physical or verbal act or conduct, including communications made in writing or by means of an electronic act, and including one or more acts committed by a pupil or group of pupils as defined in Section 48900.2, 48900.3, or 48900.4, directed toward one or more pupils that has or can be reasonably predicted to have the effect of one or more of the following:

(A) Placing a reasonable pupil or pupils in fear of harm to that pupil’s or those pupils’ person or property.

(B) Causing a reasonable pupil to experience a substantially detrimental effect on the pupil’s physical or mental health.

(C) Causing a reasonable pupil to experience substantial interference with the pupil’s academic performance.

(D) Causing a reasonable pupil to experience substantial interference with the pupil’s ability to participate in or benefit from the services, activities, or privileges provided by a school.

(2) (A) “Electronic act” means the creation or transmission originated on or off the school site, by means of an electronic device, including, but not limited to, a telephone, wireless telephone, or other wireless communication device, computer, or pager, of a communication, including, but not limited to, any of the following:

(i) A message, text, sound, video, or image.

(ii) A post on a social network internet website, including, but not limited to:

(I) Posting to or creating a burn page. “Burn page” means an internet website created for the purpose of having one or more of the effects listed in paragraph (1).

(II) Creating a credible impersonation of another actual pupil for the purpose of having one or more of the effects listed in paragraph (1). “Credible impersonation” means to knowingly and without consent impersonate a pupil for the purpose of bullying the pupil and such that another pupil would reasonably believe, or has reasonably believed, that the pupil was or is the pupil who was impersonated.

(III) Creating a false profile for the purpose of having one or more of the effects listed in paragraph (1). “False profile” means a profile of a fictitious pupil or a profile using the likeness or attributes of an actual pupil other than the pupil who created the false profile.

(iii) (I) An act of cyber sexual bullying.

(II) For purposes of this clause, “cyber sexual bullying” means the dissemination of, or the solicitation or incitement to disseminate, a photograph or other visual recording by a pupil to another pupil or to school personnel by means of an electronic act that has or can be reasonably predicted to have one or

more of the effects described in subparagraphs (A) to (D), inclusive, of paragraph (1). A photograph or other visual recording, as described in this subclause, shall include the depiction of a nude, semi-nude, or sexually explicit photograph or other visual recording of a minor where the minor is identifiable from the photograph, visual recording, or other electronic act.

(III) For purposes of this clause, “cyber sexual bullying” does not include a depiction, portrayal, or image that has any serious literary, artistic, educational, political, or scientific value or that involves athletic events or school-sanctioned activities.

(B) Notwithstanding paragraph (1) and subparagraph (A), an electronic act shall not constitute pervasive conduct solely on the basis that it has been transmitted on the internet or is currently posted on the internet.

(3) “Reasonable pupil” means a pupil, including, but not limited to, a pupil with exceptional needs, who exercises average care, skill, and judgment in conduct for a person of that age, or for a person of that age with the pupil’s exceptional needs.

K. Retirement System

All new and existing employees participate in the State Teacher Retirement System (STRS), Public Employee Retirement System (PERS), and Social Security, as appropriate.

Upon retirement, employees will work with the NJESD Payroll and Benefits Coordinator to complete, file, and submit necessary retirement forms. This collaboration ensures a smooth transition into retirement for employees by helping retirees navigate various retirement plans, healthcare benefits, and other post-employment considerations in a timely manner.

L. Attendance Alternatives

No student residing within the historical attendance area of the NJESD shall be required to attend the KEYS.

M. Post-employment Rights of Employees

Rights of School District Employees

All employees who voluntarily leave the employ of NJESD to work in KEYS will be protected by the rights outlined in Element M of this Charter.

Certificated employees who transfer to KEYS will maintain their seniority/tenure status with the NJESD. Seniority and tenure will continue to accrue for the employees in the NJESD while employed in KEYS.

NJESD credentialed staff who transfer to KEYS shall retain the right to return to New Jerusalem Elementary School provided there are vacancies.

University/College/NJESD credit earned while employed at KEYS will accrue and apply to the regular salary schedule upon the employee’s return to employment in New Jerusalem Elementary School.

Liability insurance will be maintained by the NJESD for all Charter employees.

The transfer of sick and vacation time will also be afforded to employees who return to work or transfer to a different LEA within the District.

Hiring and dismissal of administrators, teachers, instructors, and other employees, as well as the rate of pay/salaries of such individuals, is solely discretionary with the NJESD Board based upon the recommendation of the Charter School Superintendent.

KEYS will align itself with all district employment classifications, probationary periods as well as policies and procedures regarding evaluation periods and processes and timelines for employees to achieve permanent employment status.

KEYS may contract with the NJESD for the full- or part-time services of NJESD employees. Such a formal arrangement would allow the employee to continue to enjoy the full benefits of the certificated collective bargaining agreement as a continuing employee of the NJESD. Any such arrangement must not be inconsistent with the provisions of Education Code Section 47605.

KEYS staff will be selected, assigned, and transferred by the Charter School Superintendent in concurrence with the NJESD Board, with the exception that no District employee will be required to work at KEYS [(Education Code 47605)].

N. Dispute Resolution

In the event of a dispute between KEYS and the NJESD Board regarding the provisions of this charter, the Charter School Superintendent and NJESD Superintendent shall hold an informal meeting to resolve the dispute. Matters of concern not resolved by the Charter School Superintendent and NJESD Superintendent may be presented to the NJESD Board for resolution.

In the event of a dispute between the NJESD and any employee, the following internal dispute resolution process shall be implemented:

- Reasonable attempts will be made to resolve any disputes at the lowest possible level first. If, upon due consideration by the appropriate administrator, the issue merits pursuing, he/she will then take the matter to progressively higher authorities until the issue is resolved.
- Should a dispute arise at the staff level, the Charter School Superintendent will meet with the staff member in an informal setting to discuss and resolve the dispute. The informal meeting shall take place within five working days from the day the staff member registers the complaint.
- If the two parties are unable to resolve the dispute, the aggrieved party will put his/her complaint in writing and submit it to the Charter School Superintendent. The Charter School Superintendent will meet with the two parties within five working days from the date he/she

receives the written complaint. The Charter School Superintendent will render a decision within five working days.

- If, after the Charter School Superintendent has provided a decision, a resolution has still not been reached, the dispute is then addressed by the New Jerusalem School District Board of Trustees at the regular board meeting.

Additionally, KEYS will follow the Uniform Complaint Procedure (UCP) established by the District to address written complaints alleging violations of education laws, including discrimination, harassment, intimidation, bullying, and pupil fee noncompliance. Students, staff, or parents should report concerns to a teacher, principal, or the NJESD Title IX/Compliance Officer.

O. Closure Procedure

“The procedures shall ensure a final audit of the charter school to determine the disposition of all assets and liabilities of the charter school, including plans for disposing of any net assets and for the maintenance and transfer of student records.”

-Education Code Section 47605(c)(5)(O)

Closure of Delta Keys will be documented by official action of the New Jerusalem Elementary School District Board of Trustees. The action will identify the reason for the closure. The official action will also identify an entity and person or persons responsible for closure-related activities.

New Jerusalem Elementary School District will promptly notify parents and students of KEYS, the San Joaquin County Office of Education, the Charter School’s SELPA, the retirement systems in which the school’s employees participate (e.g., State Teachers’ Retirement System, and federal social security), and the California Department of Education of the closure as well as the effective date of the closure. This notice will also include the name(s) of and contact information for the person(s) to whom reasonable inquiries may be made regarding the closure, the students’ school districts of residence, and how parents (guardians) may obtain copies of student records, including specific information on completed courses and credits that meet graduation requirements.

New Jerusalem Elementary School District will ensure that the notification to the parents and students of Delta Keys of the closure provides information to assist parents and students in locating suitable alternative programs. This notice will be provided promptly following the Board of Trustee decision to close the Charter School.

Delta Keys will also develop a list of students in each grade level and the courses they have completed, together with information on the students’ districts of residence, which they will provide to New Jerusalem Elementary School District. As applicable, Delta Keys will provide parents, students and the district with copies of all appropriate student records and will otherwise assist students in transferring to their next school. All transfers of student records will be made in compliance with the Family Educational

Rights and Privacy Act (FERPA). New Jerusalem Elementary School District will store original records of Delta Keys students. All student records of Delta Keys shall be transferred to the district upon closure.

New Jerusalem Elementary School District will maintain all state assessment results, special education records, and personnel records and be responsible for closure-related activities in accordance with applicable Law.

New Jerusalem Elementary School District will prepare Delta Keys final financial records and have an independent audit completed within six months after closure. The audit will be prepared by a qualified Certified Public Accountant selected by the New Jerusalem Elementary School District Board of Trustees. The final audit will include an accounting of all financial assets, including cash and accounts receivable and an inventory of property, equipment, and other items of material value, an accounting of the liabilities, including accounts payable and any reduction in apportionments as a result of audit findings or other investigations, loans, and unpaid staff compensation, and an assessment of the disposition of any restricted funds received by or due to KEYS.

New Jerusalem Elementary School District will complete and file any annual reports required pursuant to Education Code section 47604.33.

Upon the closure of KEYS, all assets of the School, including but not limited to all leaseholds, personal property, intellectual property and all ADA apportionments and other revenues generated by students attending the school, will remain the sole property of the New Jerusalem Elementary School District. Any assets acquired from the district or district property will be promptly returned upon Delta Keys closure to the district. The distribution shall include return of any grant funds and restricted categorical funds to their source in accordance with the terms of the grant or state and federal law, as appropriate, which may include submission of final expenditure reports for entitlement grants and the filing of any required Final Expenditure Reports and Final Performance Reports, as well as the return of any donated materials and property in accordance with any conditions established when the donation of such materials or property was accepted.

V. Required Supplemental Criteria

Budgets and Financial Reporting

“The petitioner or petitioners also shall be required to provide financial statements that include a proposed first-year operational budget, including startup costs, and cash flow and financial projections for the first three years of operation.”

- Education Code 47605(h)

KEYS’s three-year budget and cash flow, including financial projections. These documents are based on the Local Control Funding Formula and the best estimates of revenues and costs available to the Charter School.

See Appendix for 2024-25 2nd Interim Financial Report

Financial Reporting

The Business Department of New Jerusalem Elementary School District will provide financial reports on behalf of KEYS.

1. By July 1, a preliminary budget for the current fiscal year.
2. By July 1, an annual update (LCAP) is required pursuant to Education Code Section 47606.5.
3. By December 15, an interim financial report for the current fiscal year reflecting changes through October 31. Additionally, on December 15, a copy of the annual independent financial audit report for the preceding fiscal year will be delivered to the District, State Controller, State Department of Education, and County Superintendent of Schools.
4. By March 15, a second interim financial report for the current fiscal year reflecting changes through January 31.
5. By September 15, a final unaudited actual report for the full prior year. The report submitted will include an annual statement of all Delta Keys receipts and expenditures for the preceding fiscal year.

Fiscal Strength and Support

Delta Keys has significant financial strength (See 2nd Interim Report) to effectively manage its financial resources to support educational programs and maintain operations. This strength includes strong financial reserves to ensure smooth cash flow and meet all obligations.

Administrative Services

“The manner in which administrative services of the charter school are to be provided.”

- Education Code Section 47605(h)

New Jerusalem Elementary School District conducts operations on behalf of KEYS. A three (3) percent Oversight Fees and an eight (8) percent Indirect Cost of their LCFF Revenue, these services include all services and support rendered to the school such as Financial Management, Human Resources, Curriculum and Instructional Support, Legal & Compliance Support, Transportation Services, Communication and Public Relations.

In order to provide safety for all students and staff, KEYS will implement full health and safety policies and procedures and risk management policies in consultation with its insurance carriers and risk management experts.

Facilities

Governing Law: “The facilities to be used by the charter school. The description of facilities to be used by the charter school shall specify where the charter school intends to locate.” Education Code Section 47605(h).

Delta Keys is currently located and plans to continue to utilize its facilities at 31400 S Koster Rd, Tracy, California. These facilities shall meet the requirements of the Americans with Disabilities Act. The buildings shall receive local fire marshal approval, including fire and safety code requirements, and comply with all applicable State/County building codes.

As additional space is needed, the Director of Virtual Programs will work with the appropriate NJESD leadership to secure additional space when necessary to accommodate growth needs. Additionally, the district Chief Business Officer will be consulted to ensure adequate budget for anticipated costs including, but not limited to renovation, rent, maintenance, and additional recurring costs associated with facilities needs.

Community Impact

KEYS will implement programs and services in a manner that aligns with the district's services, offerings, and policies while ensuring that the charter's capacity needs and limitations are considered. The school will operate within a geographic location that supports accessibility for its students while maintaining a collaborative relationship with the district.

To prevent any negative impact on district services, KEYS will:

- Ensure that its operational and instructional model remains distinct yet complementary to the district's educational offerings.
- Maintain transparent communication with the district regarding facility locations and student enrollment to avoid conflicts in resource allocation.
- Provide equitable access to students while respecting district boundaries and maintaining compliance with applicable laws and regulations.
- Implement strategic enrollment management practices to ensure that student demand aligns with facility capacity and non-classroom based Independent Study laws.

VI. Alternative Education Criteria

Assurances and Acknowledgements Required for Alternative Education

- KEYS will maintain an unduplicated pupil count of at least 70% of the school's total enrollment, composed of the following required high-risk student groups.
 - Expelled (*EC* Section 48925[b]) including situations in which enforcement of the expulsion order was suspended (*EC* Section 48917)
 - Suspended (*EC* Section 48925[d]) more than 10 days in a school year
 - Wards of the Court (*Welfare and Institution Code [WIC]* Section 601 or 602) or dependents of the court (*WIC* Section 300 or 654)
 - Pregnant and/or Parenting Youth
 - Recovered Dropouts – State Board of Education (SBE) defines recovered dropouts based on *EC* Section 52052.3(b) as students who: (1) are designated as dropouts pursuant to the exit and withdraw codes in the California Longitudinal Pupil Achievement Data System (CALPADS), or (2) left school and were not enrolled in a school for a period of 180 days

- Habitually Truant (*EC* Section 48262) or Habitually Insubordinate and Disorderly whose attendance at the school is directed by a school attendance review board or probation officer (*EC* Section 48263)
- Retained more than once in kindergarten through grade eight
- Students who are credit deficient (i.e., students who are one semester or more behind in the credits required to graduate on-time, per grade level, from the enrolling school's credit requirements)
- Students with a gap in enrollment (i.e., students who have not been in any school during the 45 days prior to enrollment in the current school, where the 45 days does not include non-instructional days such as summer break, holiday break, off-track, and other days when a school is closed)
- Students with high level transiency (i.e., students who have been enrolled in more than two schools during the past academic year or have changed secondary schools more than two times since entering high school)
- Foster Youth (*EC* Section 42238.01[b])
- Homeless Youth
- The school will maintain documentation that 70% of students will be reflected on Part 1 of their Dashboard Alternative School Status (DASS) participation form, as defined in item 1 above.
- When applying for other alternative school status, ONLY the school's current enrollment will be used (in accordance with the DASS eligibility criteria and examples) to determine a school's percentage of high-risk students for DASS eligibility. A student is considered high-risk if they meet one of the high-risk criteria approved by the SBE upon first enrollment at the school. If their high-risk status starts after first entry to the school, they cannot be counted as high-risk in this calculation.

VII. Independent Study Supplemental Criteria

Assurances and Acknowledgements Required for Independent Study

- The K-12 public school guidelines for independent study will be evident in the annual audit per EC 47612.5(b).
- Independent study will be overseen by a properly credentialed teacher in accordance with EC 51747.5(a).
- The charter may receive apportionment credit for independent study based solely on the time value of student work products, as determined in each case by a certified teacher, per EC 51747.5(b).
- The charter will comply with the requirements regarding the ratio of average daily attendance (ADA) to full-time equivalent (FTE) certificated employees, as outlined in EC 51745.6(a).
- All students are required to attend daily asynchronous instruction but may also access synchronous instruction, tutoring, enrichment and/or lab activities virtually via zoom or in the on-site resource center located on the district site. A traditional master schedule is not used for asynchronous coursework, but each student has a matriculation plan detailing the course of study for the academic year, credits already earned and credits required to graduate.
- Students not meeting attendance expectations are given tiered reengagement support. If reengagement does not result in required participation pursuant to Education Code Section

51747.5, an evaluation conference is held to determine if independent study placement is appropriate or if the student would benefit from an in-person learning model.

- A signed Master Agreement will be kept on file for all students. This agreement must be signed before the start of independent study by the student, their parent, legal guardian, or caregiver (if under 18), the designated certificated employee responsible for overseeing independent study, and all individuals directly assisting the student (EC 51747(g)(9)(A)). The agreement will comply with all requirements outlined in EC 51747(g) and will be maintained in the student's file as required.

Appendix

[Appendix Keys Renewal](#)