

Renewal Petition Staff Report

Aspire College Academy

Decision Hearing: October 21, 2025

School Overview

Aspire College Academy

Charter Management Organization (CMO):	Aspire Public Schools	Previous Renewal Year(s):	2018
Year Opened:	2013	Campus Address:	8030 Atherton Street, Oakland, CA 94605
OUSD Board District:	6	Current Enrollment: ¹	196
Current Grades Served:	TK-5	5-Year Projected Enrollment	242, 268, 266, 272, 296

Staff Recommendation

Staff recommends approval of the renewal petition for Aspire College Academy (“ACA” or “Charter School”) for 5 years, beginning July 1, 2026, until June 30, 2031, to serve students in Grades TK-5 and a projected annual enrollment as outlined in the table above, with a fiscal benchmark as detailed in the full staff recommendation on page 32.

Summary of Findings:

Strengths	Challenges
• ELA proficiency and DFS show strong post-pandemic upward trajectory. • Math proficiency and DFS have increased significantly post-pandemic. • ELs making progress has increased, with a Green ELPI indicator. • Despite declining enrollment, school remains a sustainable size with a healthy fund balance.	• Declining DFS for Students with Disabilities post-pandemic. • Most recent audit identified two material weaknesses.

¹ Per first month statistical report submitted to OUSD on August 26, 2025.

Criteria for Evaluation and Procedural Background

Criteria for Renewal

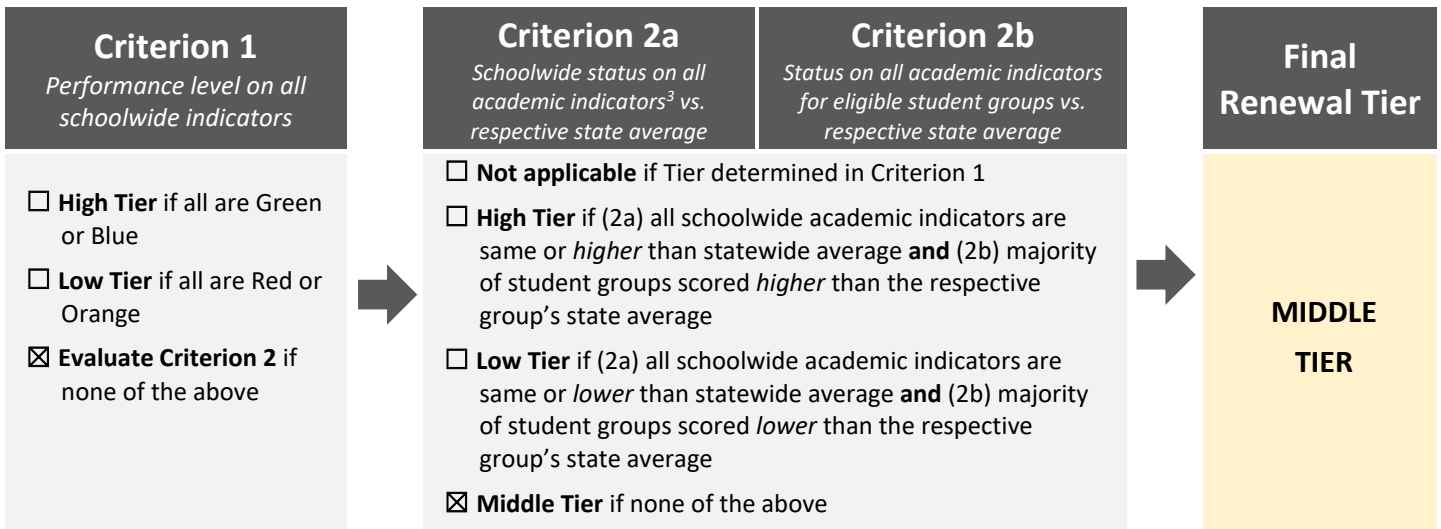
The Charter Schools Act of 1992 and subsequent amendments established the criteria by which charter renewal applications must be evaluated. In order to recommend the approval of a charter school renewal, Office of Charter Schools (“OCS”) Staff must determine that the charter school has met the requirements set forth in Education Code (“Ed Code”) Sections 47605, 47607, and 47607.2. Specifically, in order to be recommended for renewal, OCS Staff determines whether the charter school has met the following renewal criteria:

- I. *Has the Charter School Presented a Sound Educational Program?*
- II. *Is the Charter School Demonstrably Likely to Successfully Implement the Proposed Educational Program?*
- III. *Is the Petition Reasonably Comprehensive?*
- IV. *Is the School Serving All Students Who Wish to Attend?*

Renewal Tier Analysis

In addition to the criteria outlined above, Education Code outlines a three-tiered system of performance categories for most² charter schools seeking renewal. This system provides additional criteria and conditions for evaluating the charter school’s renewal petition based on the performance category, or “Tier”, in which the school is placed. Figure 1 below shows a summary of the criteria used by the California Department of Education (“CDE”) to determine ACA’s Renewal Tier. A more detailed analysis of the Charter School’s Renewal Tier, including analyses of each criterion and sub-criterion, can be found in Figures 2-4.

Figure 1: ACA Renewal Tier Analysis



Sources: California School Dashboard; CDE Charter School Performance Category Data File; CDE “Determining Charter School Performance Category” Flyer

Criterion 1 Analysis

Criterion 1 is based on the performance colors received for **all** state indicators on the Dashboard for the two previous State Dashboard years. Per Education Code, if all state indicators are Blue or Green, the Charter School is assigned to the High Tier. If all state indicators are Orange or Red, the Charter School is assigned to the Low Tier. In all other circumstances, an evaluation of Criterion 2 is necessary to determine the Charter School’s Tier. As shown in Figure 2 below, ACA did not fit the requirements for Low Tier or for High Tier in Criterion 1, thus, an evaluation of Criterion 2 is necessary.

² The three-tiered system does not apply to schools that qualify for the Dashboard Alternative School Status (DASS) program.

³ “Academic indicators” refer to the ELA, Math, English Learner Progress, and College and Career Readiness Indicators on the California School Dashboard.

Figure 2: Criterion 1 Analysis – Schoolwide Results

Indicator	2023	2024
ELA	Orange	Yellow
Math	Yellow	Yellow
EL Progress	N/A	Green
Chronic Absenteeism Rate	Yellow	Yellow
Suspension Rate	Blue	Orange

Source: California School Dashboard

Criterion 2 Analysis

Criterion 2 is based on the “Status” (or the current year data) for all **academic** indicators (ELA, Mathematics, EL Progress, and College/Career) with a performance color for the two previous Dashboard years. Performance determinations are then based on the overall status compared with the statewide averages for the previous two Dashboard years. Criterion 2 is broken into two sub-criteria – Criterion 2a evaluates the Charter School’s schoolwide performance and Criterion 2b evaluates the Charter School’s student group performance, specifically for student groups which scored below the statewide average⁴. Per Education Code, if (Criterion 2a) all **schoolwide** academic indicators are same or higher than the statewide average *and* (Criterion 2b) the majority of eligible student groups are higher than their group’s respective statewide average, then the Charter School is placed in the High Tier. If (Criterion 2a) all **schoolwide** academic indicators are same or lower than the statewide average *and* (Criterion 2b) the majority of eligible student groups are lower than their respective statewide average, then the Charter School is placed in the Low Tier. In all other circumstances, the Charter School is placed in the Middle Tier. As shown in Figure 3 and Figure 4 below, the Charter School did not meet the requirements for High Tier or for Low Tier, thus, ACA is placed in the Middle Tier⁵.

Figure 3: Criterion 2a Analysis

Academic Indicator	2023			2024		
	School Status	State Status	Result	School Status	State Status	Result
ELA	-100.2	-13.6	Lower	-68.8	-13.2	Lower
Math	-87.3	-49.1	Lower	-58.9	-47.6	Lower
EL Progress	29.5%	48.7%	Lower	52%	45.7%	Higher

Source: California School Dashboard

Figure 4: Criterion 2b Analysis

Indicator	Student Group	2023			2024		
		School Status	State Status	Result	School Status	State Status	Result
ELA	African American	-114.4	-59.6	Lower	-80.9	-58.9	Lower
	English Learner	-107.8	-67.7	Lower	-78.2	-67.6	Lower
	Hispanic/Latino	-87.2	-40.2	Lower	-59.4	-39.3	Lower
	SED	-100.1	-42.6	Lower	-69.4	-40.9	Lower
Math	African American	-107.8	-104.5	Lower	-100.8	-102.2	Higher
	English Learner	-80.1	-93.4	Higher	-52.6	-93.4	Higher
	Hispanic/Latino	-71.7	-80.8	Higher	-32	-79.2	Higher
	SED	-87.9	-80.8	Lower	-61	-78.2	Higher
EL Progress		29.5%	48.7%	Lower	52%	45.7%	Higher

Source: California School Dashboard

⁴ For more information regarding which student groups are included in the analysis for Criterion 2b, please see the CDE’s Performance Categories Flyer: <https://www.cde.ca.gov/sp/ch/documents/categoryflyer.pdf>

⁵ Charter school performance categories for all California charter schools can be found here: <https://www.cde.ca.gov/sp/ch/performancecategorydf.asp>

Additional Guidance for Middle Tier Schools

As noted previously, there are additional criteria and conditions for evaluating a Charter School's petition depending on the assigned Renewal Tier. Figure 5 below outlines the renewal conditions and additional evaluation guidance applicable to schools placed in the Middle Tier.

Figure 5: Renewal Tier Additional Guidance

MIDDLE TIER - Additional Guidance and Decision Criteria	
Term	May only be renewed for a 5-year term.
Additional Renewal Conditions	May be denied upon making written findings that: <i>The charter school has failed to meet or make sufficient progress toward meeting standards that provide a benefit to the pupils of the school; AND</i> <i>The closure is in the best interest of the pupils; AND</i> <i>The decision provided greater weight to performance on measurements of academic performance (if applicable).</i> May also be denied with a written finding that the school is demonstrably unlikely to successfully implement the program set forth in the petition due to a finding which demonstrates either: <i>Substantial fiscal or governance concerns; or</i> <i>The school is not serving all pupils who wish to attend, as documented by data provided by the CDE or by any substantiated complaints that the charter school has not complied with suspension, expulsion, or involuntary disenrollment procedures.</i> A chartering authority may only deny for either of the two reasons listed above only after it has provided at least 30 days' notice to the charter school of the alleged violation and provided the charter school with a reasonable opportunity to cure the violation, including a corrective action plan proposed by the charter school. The chartering authority may deny renewal only by making either of the following findings: <i>The corrective action proposed by the charter school has been unsuccessful; or</i> <i>The violations are sufficiently severe and pervasive as to render a corrective action plan unviable.</i>
Verified Data ⁶ (Optional)	If the charter school chooses to submit, the authorizing entity shall also consider clear and convincing evidence⁷, demonstrated by verified data, showing either: <i>The school achieved measurable increases in academic achievement, as defined by at least one year's progress for each year in school; or</i> <i>Strong postsecondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers.</i>

Source: Education Code §47607.2(b)

⁶ Ed Code §47607.2(c) defines verified data as data derived from nationally recognized, valid, peer-reviewed, and reliable sources that are externally produced. The State Board of Education established criteria to define verified data and identify an approved list of valid and reliable assessments that shall be used for this purpose. For more information, please review the CDE's Verified Data website page: <https://www.cde.ca.gov/sp/ch/verifdata.asp>

⁷ Pending renewal of Ed Code §47607.2(b)(5) beyond January 1, 2026

Procedure

1. The Charter School submitted a renewal petition to the District on August 1, 2025.
2. OCS Staff conducted an interview with 2 members of the Aspire Public Schools Governing Board on August 22, 2025, after all 4 members submitted a self-evaluation to assess strengths and gaps in the Governing Body.
3. The OUSD review team conducted a site visit on September 8, 2025. This site visit involved classroom observations and focus group interviews with students, families, teachers, and school leadership.
4. The review team conducted a review of the school's documents, policies, financials, academic performance, and renewal petition to assist in developing the staff report.
5. The initial public hearing was held on September 25, 2025.
6. Staff findings were made public by the 15-day posting requirement, which was October 6, 2025.
7. The decision public hearing is being held on October 21, 2025.

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I. Renewal Criteria I: Has the Charter School Presented a Sound Educational Program?

In order for a charter school's renewal petition to be approved, it must present a sound educational program for its students. For schools in the Middle Tier, the District is required to consider the school's performance on California School Dashboard indicators, providing greater weight to performance on academic indicators. Although Education Code does not specifically reference similar criteria for schools meeting the Middle Tier criteria (outside of the Renewal Tier Analysis), the following is being included for context. To provide a comprehensive overview of the educational program, the evaluation below includes evidence from the California School Dashboard as well as results from the California Assessment of Student Performance Progress ("CAASPP") Smarter Balanced Assessment Consortium ("SBAC") assessments, ELPAC results, and a summary of the renewal site visit. As a high-level summary, Figure 6 below represents the academic indicator results from the California School Dashboard over the course of the charter term, details for which can be found in the subsequent sections.

Figure 6: California School Dashboard Academic Indicator Summary

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
English Language Arts	Orange ↓ -20.30 pts	No Color ↔	No Color ↔	No Color ↔	Orange ↔ 11.10 pts	Yellow ↔ 31.50 pts
Math	Orange ↓ -3.60 pts	No Color ↔	No Color ↔	No Color ↔	Yellow ↔ 26.00 pts	Yellow ↔ 28.50 pts
English Learner Progress	No Color ↔	No Color ↔	No Color ↔	No Color ↔	No Color ↔	Green ↔ 22.50 pp

Source: California School Dashboard

A. SBAC Performance Summary – English Language Arts

The below section represents a summary of the results from the ELA SBAC assessment at the Charter School including schoolwide average proficiency rates and average Distance from Standard ("DFS") results disaggregated by student group. Results for the California Alternate Assessments ("CAAs") were not included as ACA did not surpass the required threshold of tested students and, therefore, no data is available. While a more detailed analysis can be found in the subsequent sections, a summary of these data is below:

- **Schoolwide Trends:** Post-pandemic, ACA's proficiency increased but remains below the District average.
- **Student Group Trends:** From 2021-22 to 2023-24, each student group showed gains in average DFS, with the exception of Students with Disabilities, whose average DFS decreased.

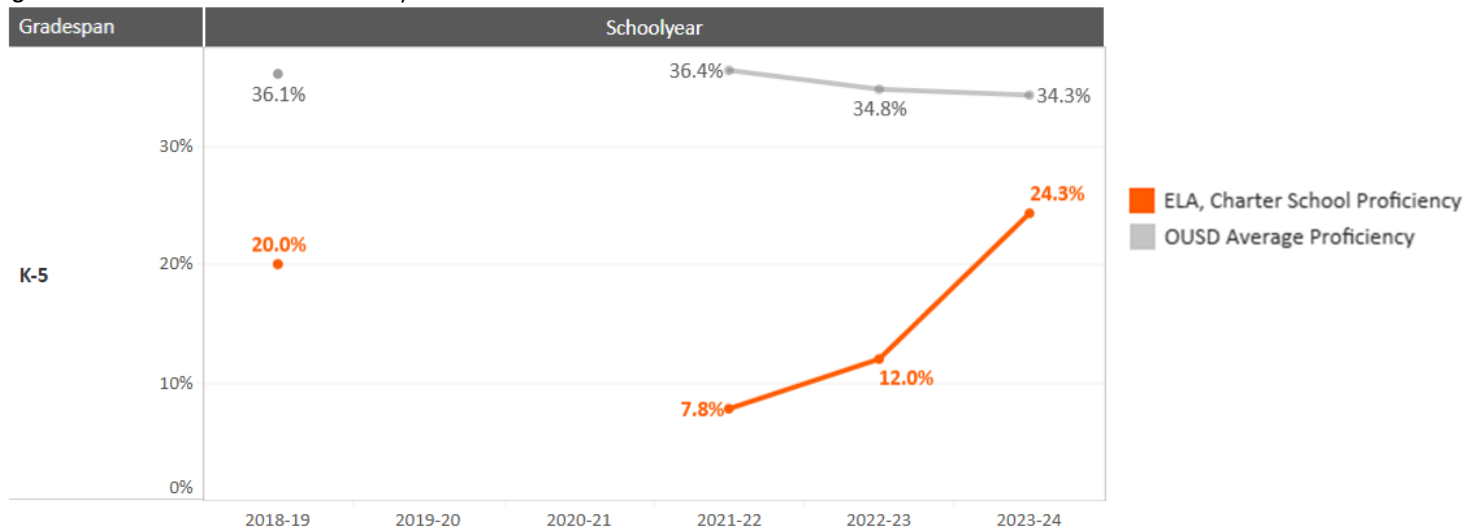
Average Proficiency Rates

To supplement the information provided in the California School Dashboard, additional analyses of the results from the ELA SBAC assessment are provided in this and subsequent sections. Below, Figure 7 represents the Charter School's average proficiency rates on the ELA SBAC over the course of the charter term, or the percentage of students who have

met or exceeded the “Standard” threshold for this exam. The figure additionally includes average proficiency rates for the corresponding grade spans at OUSD for further context. As shown below:

- From 2021-22 to 2023-24, ACA’s proficiency increased from 7.8% to 24.3%. For all years of the charter term, ACA’s proficiency rates have been lower than the District average.

Figure 7: Schoolwide ELA SBAC Proficiency Rates Over Time – ACA and OUSD*



Source: Downloadable CAASPP Research Files

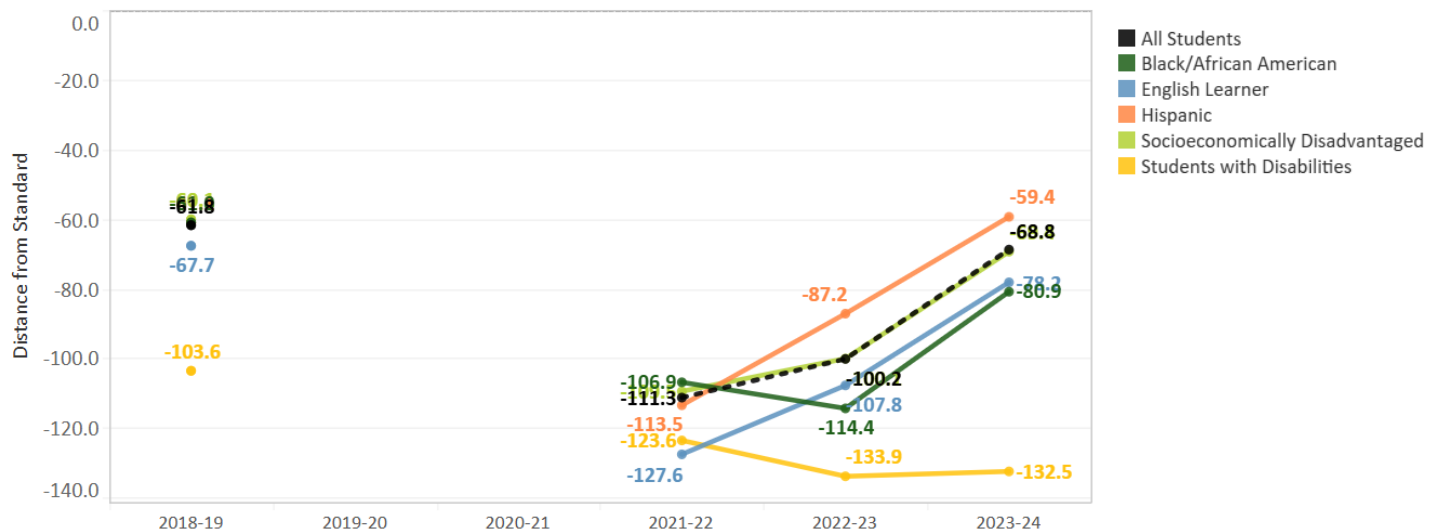
*Testing for 2019-20 was cancelled due to COVID-19. Testing for 2020-21 was optional.

Distance from Standard (DFS) and Student Group Results

Figures 8 and 9 below represent the Charter School’s average Distance from Standard (“DFS”) on the ELA SBAC assessment over the course of the charter term. While average proficiency rates illustrate the percentage of students scoring at or above the “Standard Met” threshold on the SBAC assessment, average DFS measures how far, on average, student results deviate from the “Standard Met” threshold, providing a more granular analysis. As shown in Figure 8 below:

- From 2022-23 to 2023-24, average DFS for each student group increased with the exception of the Students with Disabilities student group which remained at a similar level.

Figure 8: ACA ELA DFS Over Time*



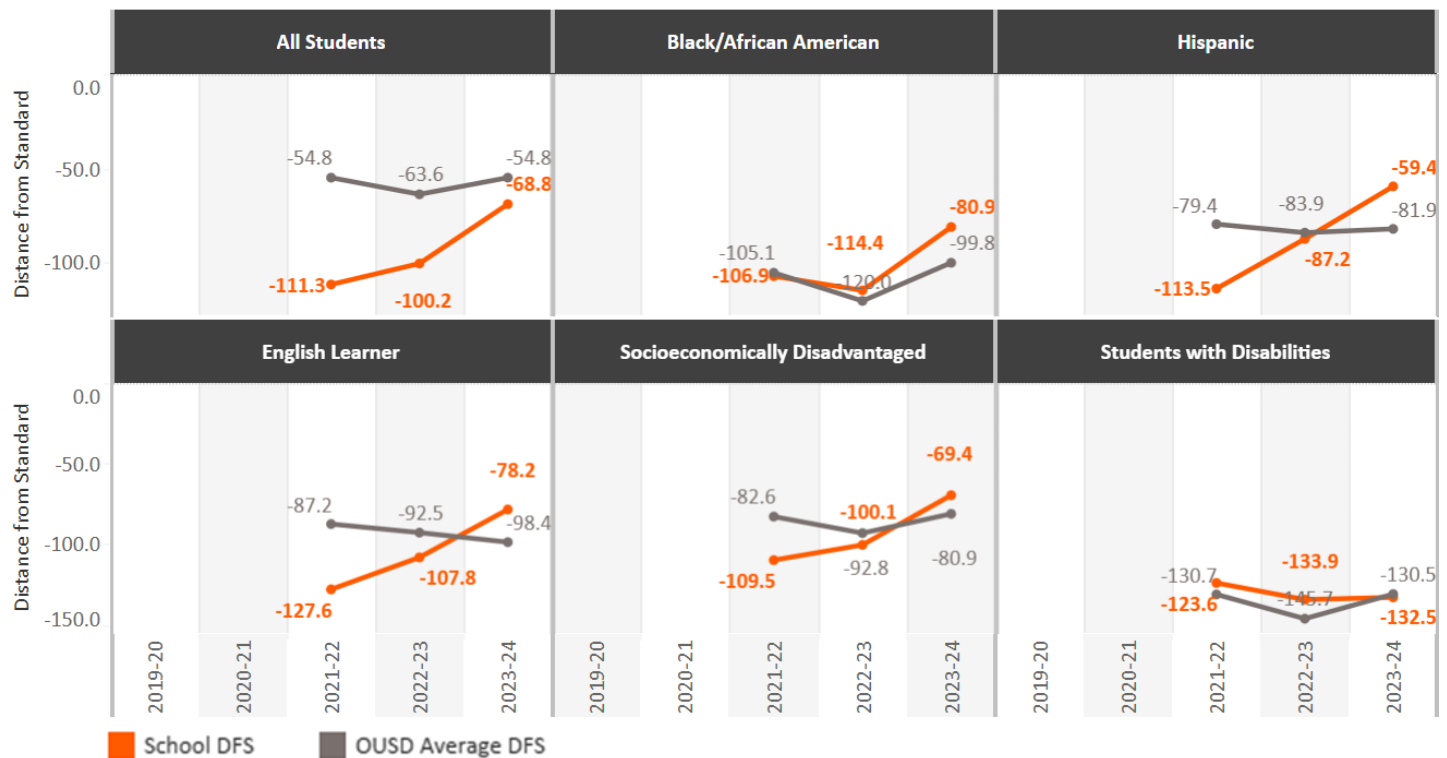
Source: California School Dashboard

*Testing for 2019-20 was cancelled due to COVID-19. Testing for 2020-21 was optional.

Figure 9 below again shows the average DFS, both schoolwide and for key student groups, over the course of the charter term, but also compares these results with the OUSD average for each corresponding group. Please note, despite the comparisons below, students within the same group may be quite different from one another (e.g. severity of disability for special education students, progress levels for English Learners). As shown below:

- In 2023-24, average DFS for each student group at ACA increased and exceeded or was similar to their respective District student group average.
- The Hispanic student group experienced the greatest increase in average DFS, about 28 points, and was approximately 23 points above the District average in 2023-24.

Figure 9: ELA DFS Over Time for ACA and OUSD



Source: California School Dashboard

*Testing for 2019-20 was cancelled due to COVID-19. Testing for 2020-21 was optional.

B. SBAC Performance Summary – Mathematics

The below section represents a summary of the results from the Math SBAC assessment at the Charter School including schoolwide average proficiency rates and average Distance from Standard (“DFS”) results disaggregated by student group. Results for the California Alternate Assessments (“CAAs”) were not included as ACA did not surpass the required threshold of tested students and, therefore, no data is available. While a more detailed analysis can be found below, a summary of these data is below:

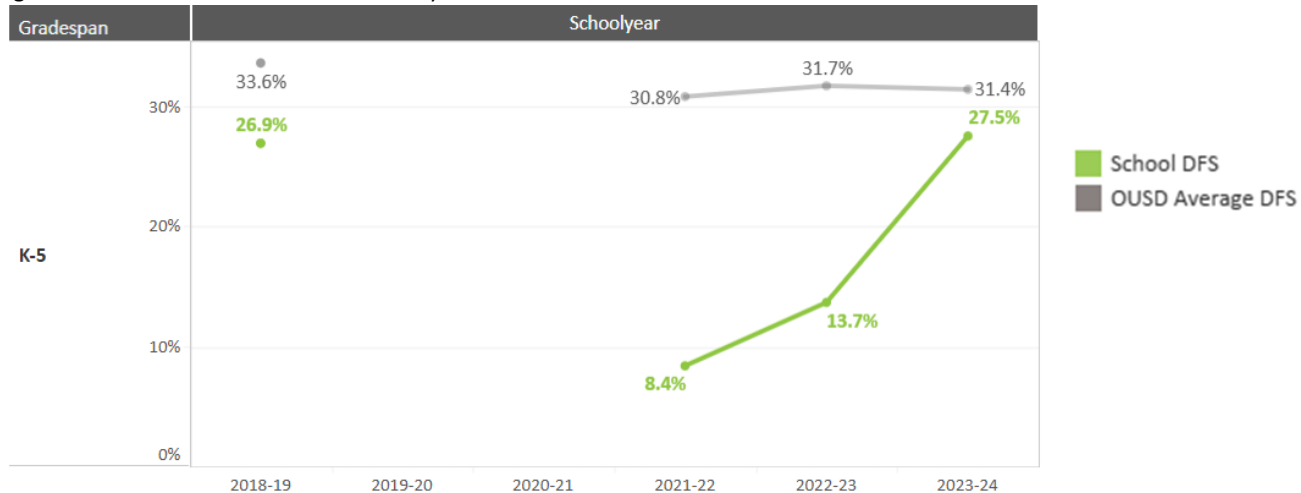
- **Schoolwide Trends:** Post-pandemic, ACA’s proficiency and average DFS improved but proficiency remains slightly below the District’s K-5 average.
- **Student Group Trends:** From 2022-23 to 2023-24, each student group saw improvements in average DFS, with the exception of the Students with Disabilities student group. Notably, the Hispanic student group experienced the greatest increase during that time period.

Average Proficiency Rates

To supplement the information provided in the California School Dashboard, additional analyses of the results from the Math SBAC assessment are provided in this and subsequent sections. Below, Figure 10 represents the Charter School's average proficiency rates on the Math SBAC over the course of the charter term, or the percentage of students who have met or exceeded the "Standard" threshold for this exam. The figure additionally includes average proficiency rates for the corresponding grade spans at OUSD for further context. As shown below:

- From 2021-22 to 2023-24, ACA's proficiency increased significantly from 8.4% to 27.5%. For all years of the charter term, ACA's proficiency rates have been lower than the District average.

Figure 10: Schoolwide Math SBAC Proficiency Rates Over Time – ACA and OUSD*



Source: Downloadable CAASPP Research Files

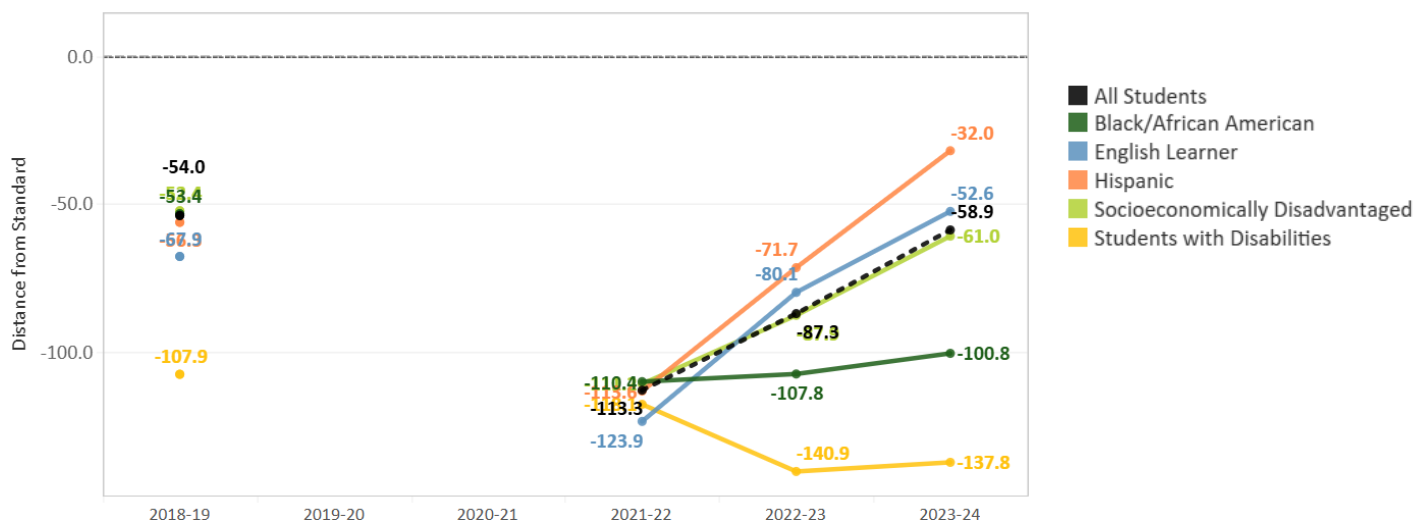
*Testing for 2019-20 was cancelled due to COVID-19. Testing for 2020-21 was optional.

Distance from Standard (DFS) and Student Group Results

Figures 11 and 12 below represent the Charter School's average Distance from Standard ("DFS") on the Math SBAC assessment over the course of the charter term. While average proficiency rates illustrate the percentage of students scoring at or above the "Standard Met" threshold on the SBAC assessment, average DFS measures how far, on average, student results deviate from the "Standard Met" threshold, providing a more granular analysis. As shown in Figure 11:

- From 2021-22 to 2023-24, each student group made gains in average DFS with the exception of the Students with Disabilities student group. Hispanic students saw the greatest increase in average DFS.

Figure 11: ACA Math DFS Over Time*



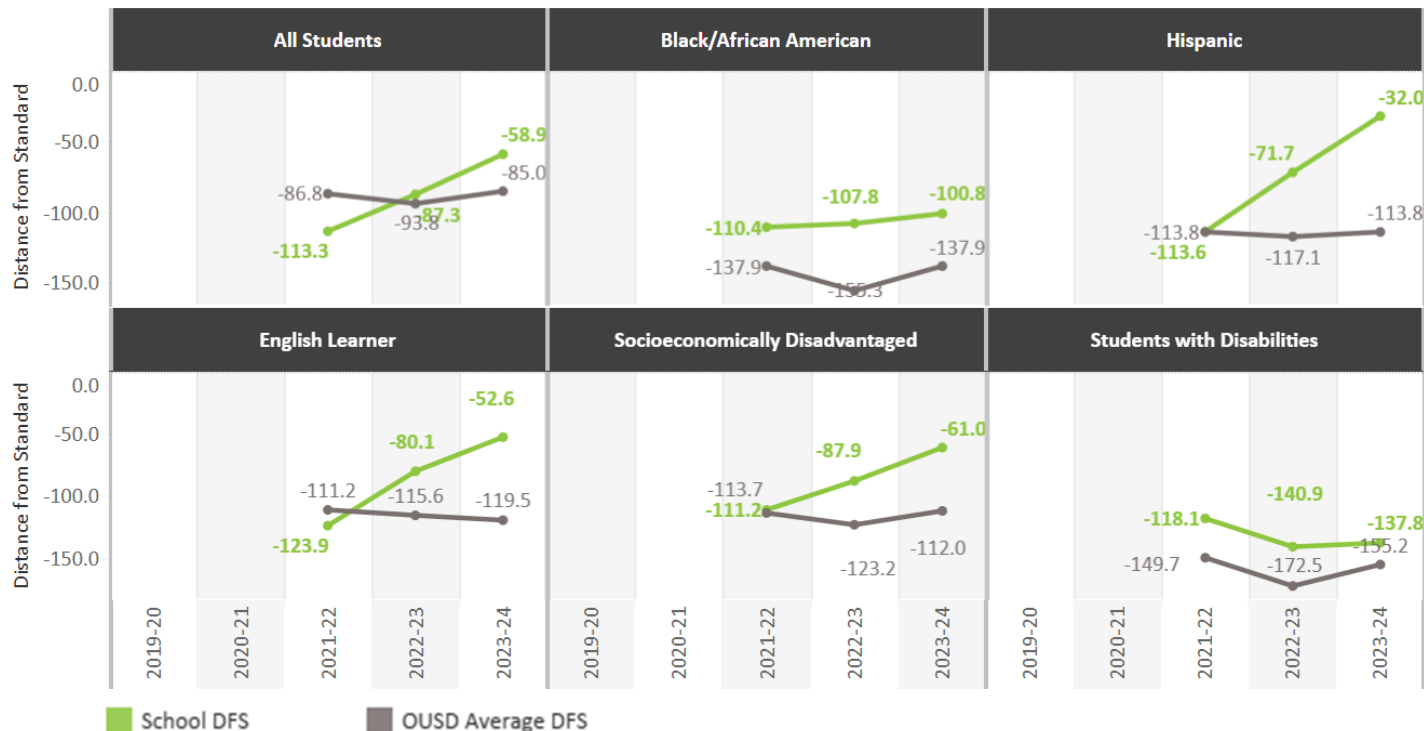
Source: Downloadable CAASPP Research Files

*Testing for 2019-20 was cancelled due to COVID-19. Testing for 2020-21 was optional.

Figure 12 again shows the average DFS, both schoolwide and for key student groups, over the course of the charter term, but also compares these results with the OUSD average for each corresponding group. Please note, despite the comparisons below, students within the same group may be quite different from one another (e.g. severity of disability for special education students, progress levels for English Learners). As shown below:

- *In 2022-23 and 2023-24, all student groups scored above the respective District average.*
- *Post-pandemic, the Hispanic student group made significant gains. In 2023-24, the Hispanic student group average DFS increased about 40 points and was about 102 points above the respective District average.*
- *From 2022-23 to 2023-24, the Black/African American student group made net gains and was about 37 points above the respective District average.*

Figure 12: Math DFS Over Time ACA and OUSD*



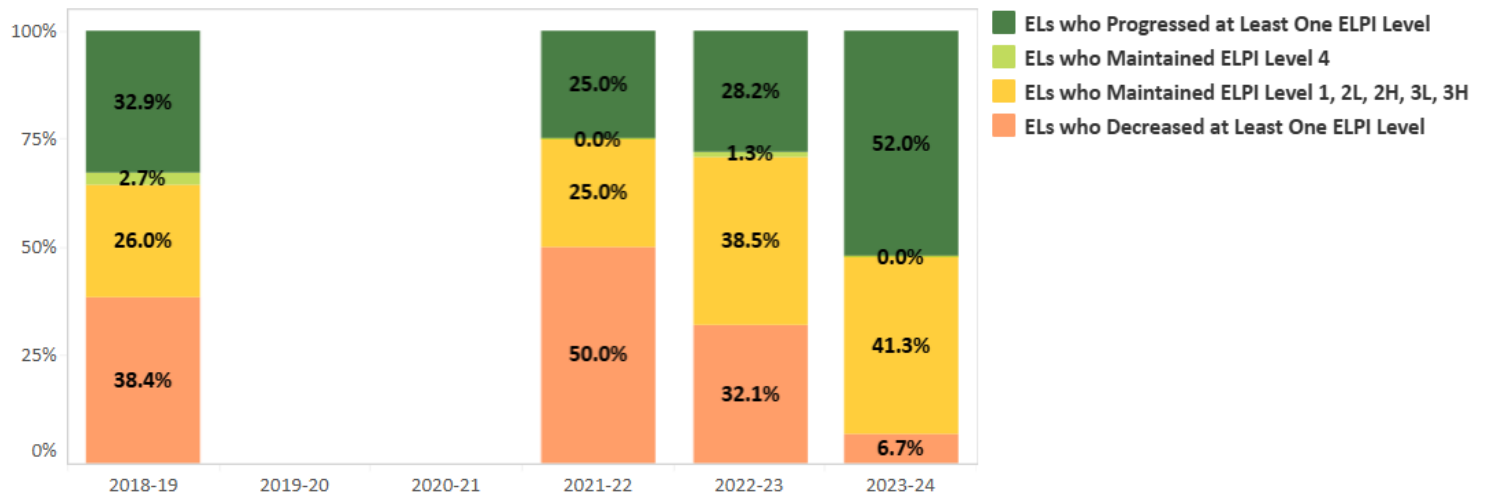
Source: Downloadable CAASPP Research Files
 *Testing for 2019-20 was cancelled due to COVID-19. Testing for 2020-21 was optional.

C. English Learner Progress

In the past four years with available data, ACA tested 73, 4, 78, and 75 students on the Summative English Language Proficiency Assessment (ELPAC), respectively. The figure below shows the percentage of these students who progressed at least one English Learner Progress Indicator (ELPI) level, maintained ELPI level 4, maintained lower ELPI levels, and decreased at least one ELPI level. As shown below:

- *Post-pandemic, the percentage of English Learners making progress towards English language proficiency increased significantly. In 2023-24, approximately 52% of English Learner students at ACA progressed a least one ELPI level, an almost 24% increase from 2022-23.*

Figure 13: Summative ELPAC Results



Source: California School Dashboard

D. Differentiated Assistance Eligibility

Differentiated Assistance (“DA”) is a system of targeted technical assistance to support school districts and charter schools improve student outcomes and address equity gaps. Eligibility for DA⁸ is based on student group results on the California School Dashboard. Prior to the 2023-24 school year, charter schools were not eligible to be identified for DA. Charter schools became eligible for DA beginning with the 2023 California School Dashboard results.

Based on the results of the 2023 and 2024 California School Dashboards, ACA **was not** identified for Differentiated Assistance.

E. Renewal Site Visit Summary

School Quality Review Rubric Report

Charter school renewal site visits are guided by the District’s School Quality Review (“SQR”) process. The process is based on a rubric⁹ which describes three key domains (Mission and Vision, Quality Program Implementation, and Collective Leadership and Professional Learning) which are further broken into three threads (Instruction, Culture, and Systems and Structures). In order to gather evidence for each of these domains, the OUSD Review Team conducted classroom observations, document reviews, an interview with Charter School leadership, and focus groups with students, families, and teachers. Following the renewal site visit, the OUSD Review Team rated each domain and sub-domain collaboratively using the SQR Rubric Ratings range from 1 (low) to 4 (high): 1 = Emerging, 2 = Developing, 3 = Implementing, and 4 = Sustaining.

Figure 14: Renewal Site Visit Summary

ACA Renewal Site Visit, September 8, 2025

OUSD Review Team: Kelly Krag Arnold (OCS Director), Madison Thomas (OCS Deputy Director), Guadalupe Nuño (OCS Community Liaison), Tim Morris (OCS Policy Specialist), Jennifer Blake (Executive Director, Special Education and Health Services), Kate Sugarman (Deputy Chief of Continuous Improvement), Jason Yamashiro (Academic Consultant)

⁸ Detailed criteria for differentiated assistance can be found at <https://www.cde.ca.gov/ta/ac/cm/leaproposedcrit.asp>.

⁹ The School Quality Review Rubric can be found here: <https://www.ousd.org/officeofcharterschools/for-charter-school-staff/charter-petitions#renewal>

SQR Domains and Threads	Domain 1: Mission and Vision	Domain 2: Quality Program Implementation	Domain 3: Collective Leadership and Professional Learning
Thread A: Instruction	2.9	3.2	3.4
Thread B: Culture	2.9	2.7	3.5
Thread C: Systems and Structures	3.0	3.4	3.1

Within each Domain and Thread in the SQR Rubric, there are multiple “sub-domains”. The following represent the three highest rated and the three lowest rated sub-domains for ACA.

Figure 15: Highest and Lowest Rated SQR Sub-Domains

Highest Rated Sub-Domains		
Score	Sub-Domain	Description of Sub-Domain
3.6	3A.1 Collective Ownership of Student Outcomes	Staff reflect on the school mission/vision to build collective ownership of student outcomes with high expectations of one another through regular cycles of goal-setting and analysis of outcomes. School leaders, teachers, and staff hold high expectations for each other as professionals.
3.5	3B.1 Collaborative Professional Culture	The school has a professional culture in which educators have authentic opportunities for collaboration and are able to leverage each other’s knowledge and skills in service of the school’s vision, mission, priorities and goals. Adults have interdependent, trusting relationships, and address conflict productively in the service of student learning and well-being. The school prioritizes the mental health and wellness of educators on campus.
3.5	2C.1 Multi-tiered System of Support	The school develops and implements a Multi Tiered System of Support Plan that guides the delivery of quality instruction, social emotional learning, behavioral guidelines and mental health supports. Tiered support structures are in place, utilizing available resources (time, people, and processes) to provide targeted instruction to students who need more support to reach grade-level standards. Classroom and school-wide systems are in place to identify which students are struggling and why they are struggling; efficiently provide needed academic, social-emotional and/or behavioral supports; monitor their effectiveness; and adjust.
Lowest Rated Sub-Domains		
Score	Sub-Domain	Description of Sub-Domain
2.2	3C.4 Student Leadership/Voice	School has a structure for leveraging student leadership/voice in decision making.
2.3	1A.2: Graduate Profile	The school has defined the complex cognitive and social-emotional skills that students will master by the time they graduate (from elementary, middle, or high school) in order to be college and career ready. The identified knowledge and skills are clear, concise, and rigorous.
2.3	2B.3 Meaningful Student Engagement	The school community uses Universal Design for Learning (UDL) guidelines to ensure that diverse learners are authentically engaged and can easily access school activities and programs inside and outside the classroom. Additionally, students’ prior knowledge and cultural and linguistic assets are activated and built upon using culturally and linguistically responsive practices.

Renewal Site Visit Strengths and Areas for Improvement

The OUSD Review Team noted the following strengths and areas for improvement based on the evidence collected throughout the site visit.

Strengths:

1. **Collective Ownership of Student Outcomes:** Collective ownership of student results was observed in focus group discussions, adult work in classrooms, schedules and systems of collaboration, and student performance. ACA staff have a strong belief in their students and their leadership, and are working together to build a strong learning community.
2. **Collaborative Staff Culture:** It was evident that there was a highly collaborative professional culture at ACA with weekly professional development, numerous structures for teacher collaboration, and a high level of trust between teachers.
3. **Multi-Tiered Systems of Support:** ACA staff analyze student performance to create learning supports for students from early in the year and continue to innovate ways to help high need groups like English Learners, along with others. Supports include targeted programs, small group pull outs, and after-school classes.

Areas for Improvement

1. **Student Leadership/Voice:** While there is evidence of efforts to foster student leadership and voice within the SEL learning block, and some classroom and school systems, observations of student discourse, teacher/student interaction, and student feedback indicate that the goals in this area are not being met.
2. **Graduate Profile:** Outside of the strong academic performance and a commitment to the community the specific graduate profile for an ACA student was not always clearly evident. Given the strong student and staff retention year to year, there appears to be an opportunity to develop and articulate this profile.
3. **Meaningful Student Engagement:** Classrooms featured significant academic discourse, but implementation showed inconsistent understanding of how and when to use it effectively. Students often appeared unclear about lesson objectives which meant the highly structured discourse often did not result in meaningful engagement. Small group structures were utilized extensively, creating potential to increase meaningful engagement. However, inconsistencies in the implementation revealed gaps in routines and lesson design across teacher-led groups, aide-led work, and independent work.

F. Additional Verified Data Provided by the School¹⁰

Verified Data Background

For schools in the Middle Renewal Tier, Education Code requires that the District consider clear and convincing evidence, demonstrated by verified data, showing either of the following:

- The school achieved measurable increases in academic achievement, as defined by at least one year's progress for each year in school; or
- Strong postsecondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers.

The California State Board of Education ("SBE") adopted a list¹¹ of academic progress indicators and postsecondary indicators that met the established criteria outlined in Education Code Section 47607.2 and that may be used in the renewal process. Assessments or data sources that are not on this list may not be used as verified data. To be eligible for inclusion as verified data, a data source must include the results of at least 95 percent of eligible students.

The Charter School did not provide the district with additional verified data, as defined above, and thus none will be considered here for the purpose of renewal.

¹⁰ Pending renewal of Ed Code §47607.2(b)(5) beyond January 1, 2026

¹¹ A full list of the adopted academic progress and postsecondary indicators can be found here: <https://www.cde.ca.gov/sp/ch/verifdataacadprogress.asp>

II. Renewal Criteria II: Is the Charter School Demonstrably Likely to Successfully Implement the Proposed Educational Program?

In order for a charter school’s renewal petition to be approved, it must be demonstrably likely to successfully implement the program set forth in the petition.¹² Evidence considered for this criterion include an analysis of the Charter School’s operations, financial condition, enrollment, enrollment demographics, compliance with regulatory elements (Notices of Concern), board health and effectiveness, and staffing and credentialing.

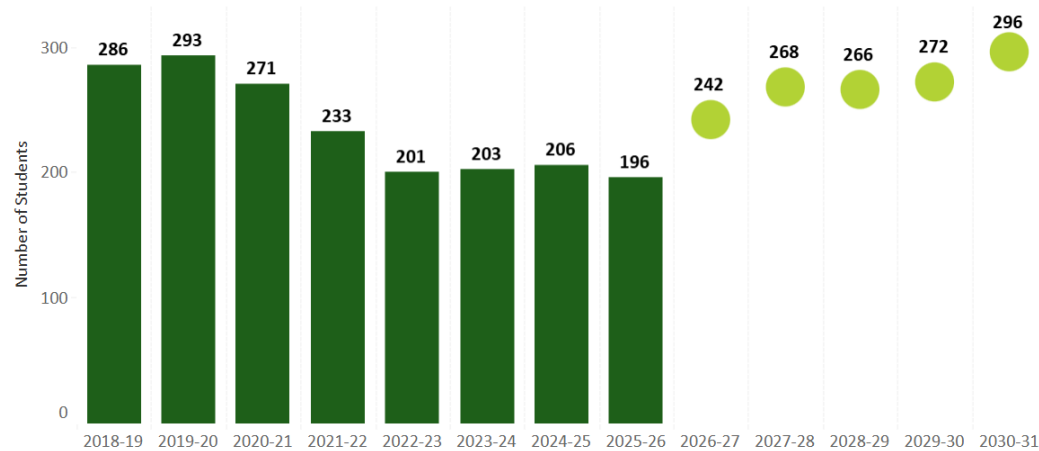
A. Enrollment

Total Enrollment by Year – Actual and Projected

The figure below includes the total enrollment of the Charter School over the course of the term, the 2025-26 enrollment as of August 26, 2025, and the projected enrollment included in the Multi-Year Projection (“MYP”). As shown below:

- ACA’s enrollment has declined significantly over the charter term, declining by approximately 33% from its pre-pandemic high in 2019-20.
- The 2025-26 enrollment total reported as of August 26, 2025, is significantly less than the 2026-27 projected enrollment total per the MYP.

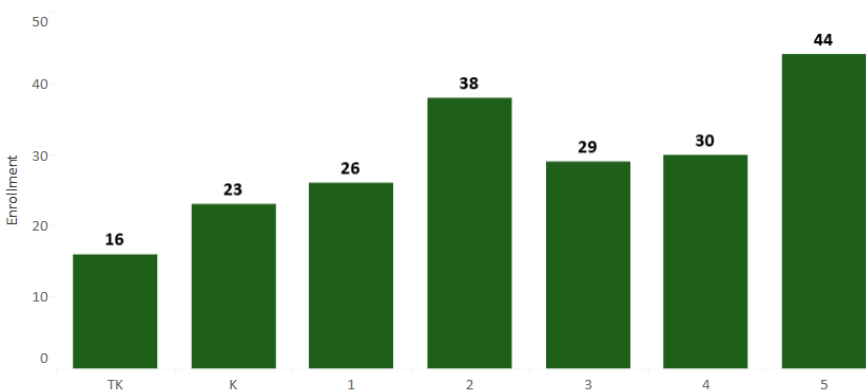
Figure 16: Total Enrollment Over Time, Actual and Projected



Source: CDE Downloadable School Enrollment Data Files; August Enrollment Submission to OCS, MYP

Enrollment by Grade Level

Figure 17: 2024-25 Enrollment by Grade Level



Source: CDE Downloadable School Enrollment Data Files

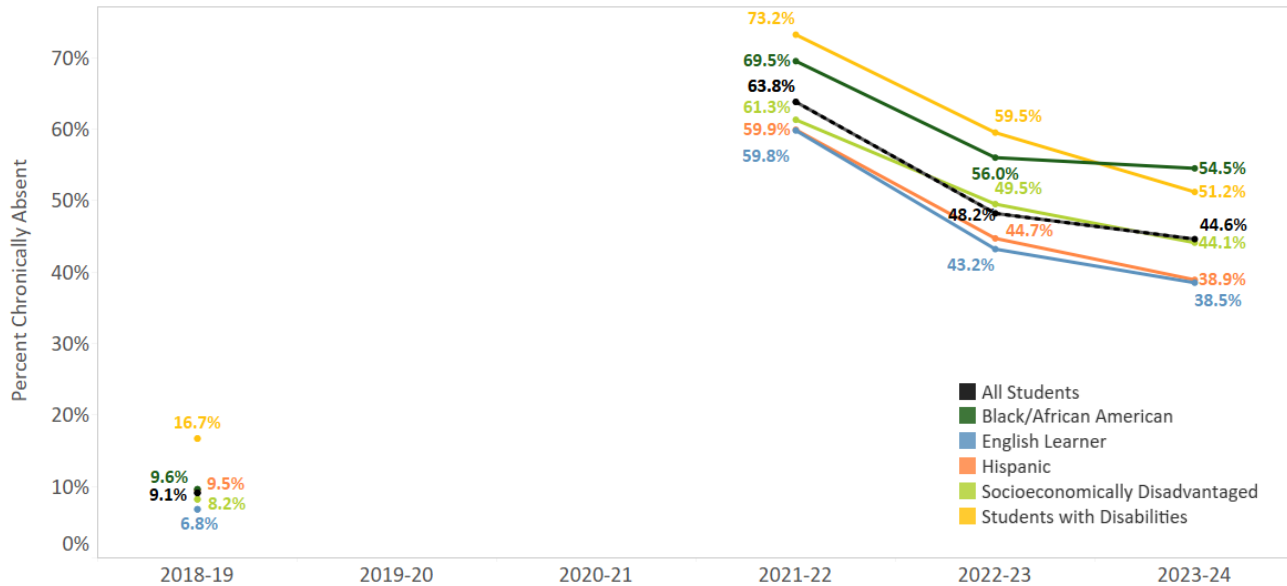
¹² EC §47605(c)(2)

Chronic Absenteeism

The figure below shows the percentage of students at the Charter School who were chronically absent, which is defined as students who were absent for 10 percent or more of the instructional days they were enrolled. As shown below:

- *Post-pandemic, chronic absenteeism has declined for each student group at ACA but remains significantly higher than pre-pandemic levels.*
- *In 2023-24, Students with Disabilities saw the greatest decline in chronic absenteeism.*

Figure 18: Chronic Absenteeism Rate by Student Group



Source: CDE Downloadable Data Files

B. Financial Condition

Summary

The Charter School's financial condition is fair based on its fiscal health indicators, audit results, and multi-year budget projections. While the school maintains adequate reserves, it has experienced a decline in the ending fund balance due to deficit spending. Additionally, the Charter School's enrollment projections are higher than historical trends and the CMO's most recent audit report contained two material weaknesses.

Fiscal Health

The figure below summarizes key fiscal indicators throughout the current charter. As shown below:

- *The Charter School has an adequate ending fund balance of approximately \$883,000 as of the 2024-25 2nd interim, although this represents a \$544,706, or 38%, decline over the course of the current charter term.*
- *Although the debt ratio increased from 0.13 to 0.53, it remains below 1.0, indicating assets still exceed liabilities and the school retains borrowing capacity if needed.*
- *The Charter School's cash reserves have frequently been below FCMAT's recommended 5% floor, although the CMO's overall cash reserves exceeded the 5% floor.^{13, 14}*
- *The Charter School's CMO's ending fund balance grew 52% over the course of the charter term, while its debt ratio remained around 0.70. See Appendix C for further details concerning the CMO.*

¹³ See Appendix C: Charter Management Organization's Key Fiscal Indicators

¹⁴ Financial Crisis and Management Assistance Team

Figure 19: Fiscal Health Summary

Financial Indicator	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25 2 nd Interim
Annual Surplus or (Deficit) <i>Indicates whether the school spent more or less than it received in revenue during the year. Deficits are shown in parentheses.</i>	(511,209)	(646,704)	650,398	(381,984)	467,766	(400,580)	(233,602)
Ending Fund Balance <i>Typically represents unrestricted funds, although in some cases, restricted funds that were not fully spent in previous years may be included.</i>	1,427,640	780,936	1,431,334	1,049,350	1,517,116	1,116,536	882,934
Debt Ratio <i>A ratio less than 1 indicates the school has lower debts than assets, representing a lower level of financial risk.</i>	0.13	0.28	0.36	0.53	0.43	0.53	Unavailable
Budgetary Reserve <i>Given the school's ADA, FCMAT² prescribes a minimum 5% reserve (calculated as Unrestricted Net Assets / Total Expenditures) as a set aside to prepare for potential liabilities. Reserve rates below this rate indicates poor financial condition.</i>	11%	8%	23%	6%	9%	9%	4%
Cash Reserve <i>FCMAT recommends 5%+ cash reserve of the total of all budgeted expenditures (calculated as Unrestricted Cash / Total Expenditures). Below 5% is indicative of a poor financial condition.</i>	2%	0%	0%	-1%	8%	-1%	1%

Source: 2018-19 through 2023-24 Annual Audit Reports and 2024-25 2nd Interim Budget Report

Annual Financial Audit Reports

Education Code requires charter schools to submit annual audits by December 15 of each year.¹⁵ As shown below:

- The Charter School's CMO received unmodified audit opinions throughout the charter term, with no statutory compliance findings specific to ACA in the most recent audit reports, and the most recent two audit reports were submitted by December 15th.
- The latest audit report identified two material weaknesses: a \$2.6 million overstatement of prepaid expenses and accounts payable, and \$2.9 million understatement of federal awards. The CMO reported these had minimal net impact on overall financial statements. OCS sent the CMO a Notice of Concern and the CMO provided a response, including plans for corrective action. See Appendix D for full response.

Figure 20: Annual Financial Audit Reports Summary

Indicator	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Timely Audit Submission <i>State law requires annual audits to be submitted by December 15.</i>	Yes	No	No	No	Yes	Yes
Audit Opinion <i>"Unmodified" indicates the financial statements fairly represent the school's financial position in accordance with accounting standards. "Modified, qualified" opinion indicates a material issue or insufficient evidence in a specific area of the financial statements, while the remainder are considered reliable.</i>	Unmodified	Unmodified	Unmodified	Unmodified	Unmodified	Unmodified

¹⁵ Education Code 47605(m), 41020(h)

Material Weakness(es) <i>A material weakness is a deficiency in internal controls that creates a reasonable possibility that a material error in the financial statements could occur and go uncorrected.</i>	Number of Findings	-	-	-	1	-	2
	Initial Year of Finding(s)	-	-	-	2021-22	-	2023-24
Significant Deficiency <i>A significant deficiency is a flaw in internal controls that is less severe than a material weakness, but still merits attention.</i>	Number of Findings	-	-	-	-	-	-
	Initial Year of Finding(s)	-	-	-	-	-	-
Statutory Compliance <i>Statutory compliance is adherence to specific state and federal laws and regulations that govern operations, funding, and program requirements within the scope of the audit.</i>	Number of Findings	-	-	-	1	1	-
	Initial Year of Finding(s)	-	-	-	2021-22	2022-23	-

Source: 2018-19 through 2023-24 Annual Audit Reports

Attendance and Enrollment in Multi-Year Budget Projections

The enrollment and attendance rate assumptions underlying the Charter School’s Multi-Year Budget Projections (“MYP”) included with the renewal petition are aligned to the projected enrollment listed in Element 1 of the charter petition and are shown in the figure below. While ACA has submitted a material revision to expand its enrollment, in order to absorb the currently co-located Aspire Triumph Tech, the expansion is separate from the renewal and will be considered following the renewal vote, if ACA’s renewal is approved. As shown below:

- ACA’s projected enrollment appears unrealistic when compared with historical trends.
- Projected attendance rates are generally consistent with the Charter School’s historical patterns.

Figure 21: MYP Summary: Projected Enrollment and Attendance Rates

	2025-26	2026-27	2027-28	2028-29
Projected Enrollment	207	242	268	266
Projected Attendance Rate	90.4%	90.6%	90.8%	91.0%

Source: Multiyear Budget Projections submitted with renewal petition

Enrollment Over Time

As shown in the Figure 22 below, ACA’s total enrollment decreased by 31.4% from 2020-21 to 2022-23 before recovering 3% over the course of the subsequent two school years. In the 2024-25 school year, the Charter School’s enrollment declined across most grade levels relative to earlier years in the charter term, with the TK and kindergarten cohorts totaling a combined 39 students, and first grade totaling 26. Further, the grade level with the largest cohort of students, 5th grade with 44 students, graduated after the 2024-25 school year. It will be challenging for the Charter School to make up for the loss of their large 5th grade cohort, even if they recruit much larger TK and kindergarten grade enrollments than they had in the 2024-25 school year.

Figure 22: Grade Level Enrollment Over Time

Student Enrollment by Grade Level and Total Enrollment							
Grade	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
TK	0	0	0	0	0	15	16
K	45	53	36	29	35	23	23
1	52	40	44	33	23	36	26
2	49	51	40	44	27	24	38
3	51	50	51	36	40	28	29
4	46	51	52	45	34	43	30
5	43	48	48	46	42	34	44
Total	286	293	271	233	201	203	206

Source: 2018-19 through 2024-25 Enrollment – CDE Downloadable School Enrollment Data Files

Enrollment Projections

The Charter School's enrollment projections in Figure 21 rely on significant growth and very high retention rates from grade to grade that may be challenging to achieve. For example, as shown in Figure 23 below, the Charter School's projections expect a 2025-26 3rd grade enrollment of 44. Yet, the Charter School projects this cohort to increase by 36% to 60 students in 4th grade in the 2026-27 school year. An increase this large would be challenging to achieve in any context, particularly within a non-transition year from 4th grade to 5th grade. The budget assumptions and narrative submitted with the budget provide no explanation or supporting evidence for how the school plans to achieve this substantial enrollment increase.

Figure 23: Projected Enrollment

Projected Student Enrollment by Grade Level and Total Enrollment				
Grade	2025-2026	2026-2027	2027-2028	2028-2029
TK	12	20	20	20
K	33	48	48	48
1	28	26	52	52
2	28	28	28	56
3	44	30	30	30
4	31	60	30	30
5	31	30	60	30
Total	207	242	268	266

Source: Renewal Petition, Element 1: Educational Program, Student Enrollment and Grade Levels Served

*The 2025-26 numbers are not yet certified by the CDE.

Multi-Year Budget Projection

The Charter School submitted their board-adopted multi-year budget projection ("MYP") as part of the renewal petition. The enrollment projections on which the Charter School's MYP are based assumes enrollment will increase in the 2026-27 and 2027-28 school years by 16.9% and 10.7%, respectively. Given enrollment declined on average 5.1% year-over-year during the current charter term, these projections may be challenging to achieve. A summary of the MYP is below in Figure 24.

Figure 24: Multi-Year Budget Projection Summary

	2025-26	2026-27	2027-28	2028-29
Projected Enrollment	207	242	268	266
Projected ADA	187.09	219.25	243.34	242.06
Projected Total LCFF Entitlement	\$2,884,386	\$3,496,875	\$4,013,813	\$4,162,420
Projected LCFF Entitlement per ADA	\$15,417	\$15,949	\$16,494	\$17,196

Source: Multiyear Budget Projections and LCFF Budget Calculator submitted with Petition.

C. Enrollment Demographics

Per California Education Code Section 47605(c)(5)(G), a charter school must include in the renewal petition a reasonably comprehensive description of *"the means by which the charter school will achieve a balance of racial and ethnic pupils, special education pupils, and English learner pupils, including redesignated fluent English proficient pupils, that is reflective of the general population residing within the territorial jurisdiction of the school district to which the charter petition is submitted"*. This description is included on page 177 of the charter petition. The current section includes a summary of the school's enrollment demographic data for further context.

As of the 2025-26 school year, ACA **does** participate in an Oakland-wide common charter enrollment system, Oakland Enrolls. OCS strongly encourages all OUSD-authorized charter schools to coordinate participation in an Oakland-wide

common charter enrollment application system. OCS believes that a unified charter enrollment approach supports educational equity by reducing barriers that can disproportionately affect families whose primary language is not English, have limited technology access, or lack the time and resources to navigate many application processes with different deadlines, websites, and requirements.

Enrollment Demographics Comparison

Enrollment demographics for the 2024-25 school year are included in the table below. Although Education Code specifies that a charter school should aspire to achieve a demographic balance which is reflective of the *entire* District, the average enrollment demographics of the District schools which serve a similar grade span and are located in the High School Attendance Area (HSAA) in which the majority of the Charter School's students reside, Castlemont/CCPA/Madison, is included for reference.

Figure 25: 2024-25 Enrollment Demographics

Student Group Type	Student Group	Charter School	OUSD schools in Comparison HSAA ¹⁶	OUSD
Race/ Ethnicity	Hispanic/Latino	66.5%	72.3%	48.3%
	Black/African American	21.8%	16.9%	19.2%
	Asian	0.5%	1.3%	9.5%
	White	N/A	3.3%	11.6%
	Two or More Races	2.4%	2.0%	6.8%
	Other Race/Ethnicity	1.9%	1.8%	1.7%
	Not Reported	6.8%	2.4%	2.9%
Other Student Groups	Socioeconomically Disadvantaged	96.1%	98.0%	81.4%
	Homeless Youth	3.4%	6.4%	6.6%
	Foster Youth	0.0%	0.3%	0.4%
	English Learners	45.6%	54.7%	32.2% (TK-5 only: 34.6%)
	Special Education	14.6%	15.4%	17.2% (TK-5 only: 16.4%)

Source: Ethnicity/English Learners – CDE Downloadable Data Files (School Enrollment, English Learners); Socioeconomically Disadvantaged/Special Education – CDE DataQuest School Enrollment by Subgroup Report

English Learner Enrollment

As shown previously, during the 2024-25 school year, 45.6% of ACA's total enrollment were English Learners. The following tables are included to further disaggregate this data to give a fuller context of the English Learners served at ACA and their level of need. As a note, this data does not provide any indication as to how well the Charter School is serving these students. The English Learner Progress Indicator on the California School Dashboard is a more appropriate metric for evaluating the strength of the English Learner program. As shown below:

- *The Charter School has a higher percentage of English Learner students who were placed in ELPAC Level 3 (Moderately Developed) compared with OUSD in the same grade span, but a lower percentage of English Learner students placed in Level 4 (Well Developed) compared with OUSD.*
- *The Charter School has a smaller proportion of students who have been English learners between 0-3 years.*

¹⁶ Includes 14 OUSD-operated schools serving students in Grades TK-5 located in the Castlemont/CCPA/Madison HSAA. Specifically, ACORN Woodland, Brookfield, Burckhalter, East Oakland Pride, Encompass, Esperanza, Korematsu, Greenleaf, Highland Community, Lockwood STEAM, Madison Park Lower, Markham, OAK, and Reach.

Figure 26: 2023-24 ELPAC Levels – Charter School vs. OUSD (Grades TK-5 only)

ELPAC Level	Charter School	OUSD (Grades TK-5 Only)
Level 4 – Well Developed	7.5%	8.7%
Level 3 – Moderately Developed	34.6%	23.8%
Level 2 – Somewhat Developed	32.7%	30.6%
Level 1 – Minimally Developed	25.2%	36.9%

Source: 2023-24 Summative ELPAC Results

Figure 27: 2024-25 Enrollment by English Language Acquisition Status and Grade

Grade	English Only (EO)	Initial Fluent English Proficient (IFEP)	English Learner (EL)	Reclassified Fluent English (RFEP)	To Be Determined (TBD)
TK	31.3%	0.0%	0.0%	0.0%	68.8%
K	56.5%	4.3%	39.1%	0.0%	0.0%
1	42.3%	0.0%	50.0%	7.7%	0.0%
2	31.6%	2.6%	57.9%	7.9%	0.0%
3	24.1%	3.4%	65.5%	6.9%	0.0%
4	43.3%	13.3%	33.3%	10.0%	0.0%
5	43.2%	2.3%	47.7%	6.8%	0.0%

Source: CDE Downloadable Data Files

Figure 28: 2024-25 English Learner Breakdown by Grade Span and Category

	EL 0-3 Years	At-Risk 4-5 Years	LTEL 6+ Years	EL 4+ Years Not At-Risk or LTEL
Charter School	56.4%	28.7%	0.0%	14.9%
OUSD (TK-5 Only)	74.1%	19.6%	0.0%	6.3%

Source: CDE Downloadable Data Files

Special Education Enrollment

As shown previously, during the 2024-25 school year, 14.6% of ACA's total enrollment were Students with Disabilities. The following figures are included to further disaggregate this data to give a fuller context of the Students with Disabilities served at ACA and their level of need. As shown below:

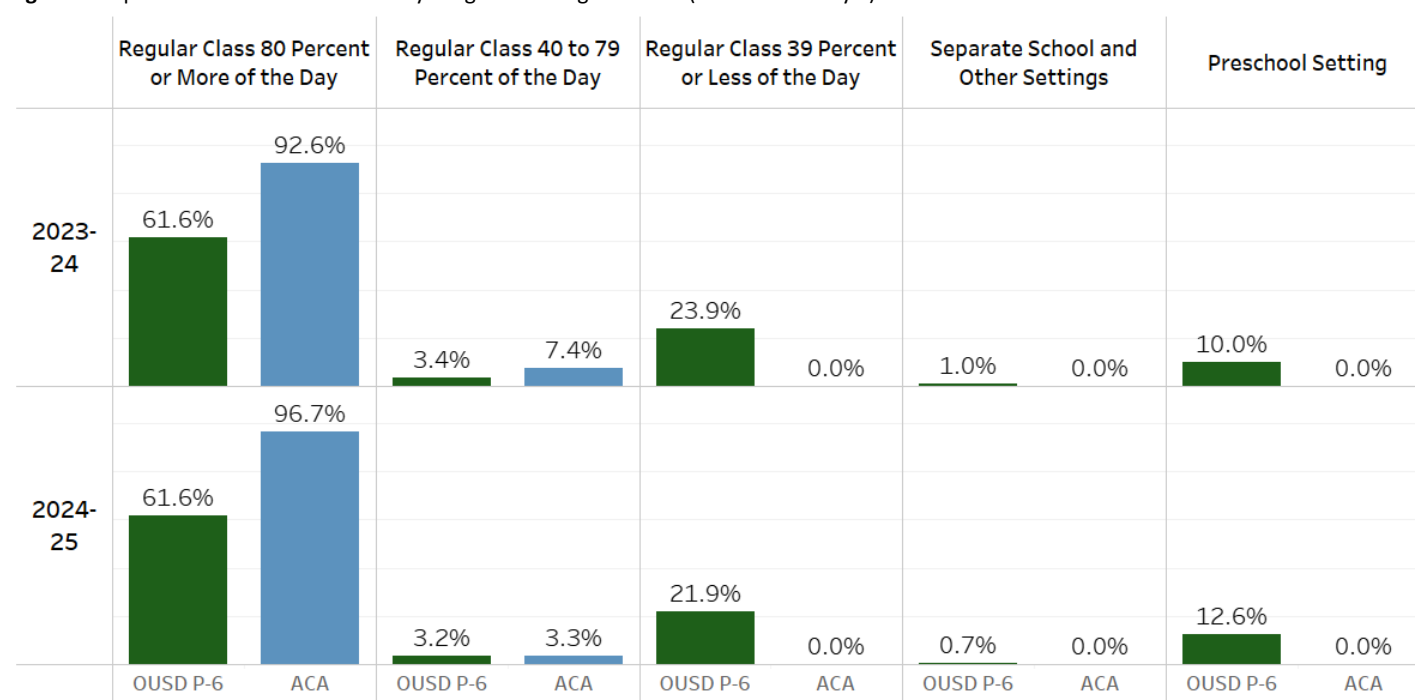
- Throughout the charter term, the majority of Students with Disabilities have had a specific learning disability, speech or language impairment, or other health impairment as the primary disability. However, in 2022-23, the percentage of Students with Disabilities with autism as the primary disability doubled and has since remained between 20-25%.
- In both 2023-24 and 2024-25, over 90% of Students with Disabilities at ACA were in a regular classroom setting for 80 percent or more of the school day. ACA did not have any students who were in a regular classroom setting for less than 39% of the day in either 2023-24 or 2024-25 which represents a significant difference from the District which had over 20% of Students with Disabilities in this category for both years.
- Approximately 20-30% of Students with Disabilities at ACA received more than 450 service minutes weekly in 2023-24 and 2024-25.

Figure 29: Special Education Enrollment by Disability Type

Disability Type	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Autism	11%	8%	8%	10%	21%	24%	21%
Deaf-Blindness	0%	0%	0%	0%	0%	0%	0%
Deafness/Hearing Impairment	0%	0%	0%	0%	0%	0%	0%
Emotional Disturbance	5%	5%	8%	12%	0%	2%	0%
Established Medical Disability	0%	0%	0%	0%	0%	0%	0%
Hard of Hearing	0%	0%	0%	0%	0%	0%	0%
Intellectual Disability	0%	3%	5%	7%	7%	7%	2%
Multiple Disabilities	0%	0%	0%	0%	0%	0%	0%
Orthopedic Impairment	0%	0%	0%	0%	0%	0%	0%
Other Health Impairment	32%	22%	24%	12%	19%	20%	19%
Specific Learning Disability	32%	38%	32%	32%	33%	29%	31%
Speech or Language Impairment	19%	24%	24%	27%	19%	22%	31%
Traumatic Brain Injury	0%	0%	0%	0%	0%	0%	0%
Visual Impairment	0%	0%	0%	0%	0%	0%	0%

Source: CALPADS End-of-Year SELPA 16.12 Report - Students with Disabilities – Education Plan by Primary Disability (EOY 4)

Figure 30: Special Education Enrollment by Program Setting vs. OUSD (Grades P-6 Only¹⁷)



Source: CDE Downloadable Data Files

¹⁷ The SPED Data by Program Setting report on CDE Dataquest only disaggregates data into P-3, 4-6, 7-8, and 9-12. Therefore, a combination of P-3 and 4-6 was chosen as the most similar comparison point to ACA.

Figure 31: Special Education by Placement and Weekly Service Minutes

	2023-24	2024-25
Percentage of students with IEPs receiving fewer than 450 ¹⁸ service minutes weekly	70.4%	76.7%
Percentage of students with IEPs receiving more than 450 service minutes weekly	29.6%	23.3%
Percentage of students with IEPs in nonpublic school (NPS) placement	0.0%	0.0%

Source: Charter School Performance Report

D. Notices of Concern and/or Notices to Cure and Correct

If credible evidence suggests that a charter school has violated state or federal law or the terms of its charter petition, the Office of Charter Schools will send the school, charter school board, or charter management organization a Notice of Concern regarding the issue, which includes remedies the charter school must implement to rectify the issue and resolve the Notice of Concern.¹⁹ ACA and its CMO, Aspire Public Schools, have collectively been issued 1 Notice of Concern during the current charter term (0 issued to the Charter School and 1 issued to the CMO) as of August 1, 2025.

Figure 32: Notices of Concern and/or Notices to Cure and Correct

School Year	Notices of Concern	Area(s) of Concern	Remedy
2018-19	0	-	-
2019-20	0	-	-
2020-21	0	-	-
2021-22	0	-	-
2022-23	0	-	-
2023-24	0	-	-
2024-25	1	23-24 Audit Finding	CMO acknowledged the concern for the audit finding identified as a "Material Weakness in Internal Controls over Financial Reporting," provided explanations for the material weakness, and shared specific steps that the CMO is taking to ensure the error does not occur again.

Source: OUSD Office of Charter Schools Notice of Concern documentation

E. Board Health and Effectiveness

A charter school governing board's decisions have a significant impact on the health and viability of its schools, as well as the quality of education students receive. Governing boards are responsible for decisions on the operations, vision, and policies of the charter school. Most importantly, governing boards are also responsible for ensuring that the charter school and its charter management organization (if applicable) is serving the best interest of students. The below table provides an overview of the Aspire Public Schools Governing Board and its composition.

¹⁸ The 450 minute threshold was chosen as a conservative estimate of the point at which a student may be considered to have moderate needs.

¹⁹ If, after sending a Notice of Concern, the Office of Charter Schools determines based on the school's response that the violation listed in the notice did not occur, the notice may be rescinded.

Figure 33: Charter School Governing Board Overview and Composition

Aspire Public Schools Governing Board Overview			
Schools Overseen	36	Total Enrollment of all Schools Overseen	15,495 students
Required Minimum # of Members	4	Current # of Members (as of August 1)	4
Regular Meeting Frequency	Monthly	Brown Act Committees	Audit, Executive
Virtual Meeting Access	Yes	Minutes and Board Packet Posted Publicly	Yes
Aspire Public Schools Governing Board Composition			
Name, Role	Time on Board	Name, Role	Time on Board
Beth Hunkapiller, Board Chair	25 years	Lorea Martínez, Board Member	4 years
Ay'Anna Moody, Board Member	5 years	Veleta Savannah, Board Member	2 years

Source: Charter School Board Self-Evaluations submitted to OUSD, CDE Dataquest

As part of the renewal process, Staff evaluates the governing board's overall health and effectiveness using the Charter School's performance report, a governing board interview, governing board audits, a board self-evaluation tool, the governing board's meeting agendas, minutes, and related documentation, and Element 4 of the charter renewal petition (along with any supporting documentation). These components are used as evidence in order to evaluate the Charter School governing board on the "Board Effectiveness Core Competencies" found below. The scale used for rating is aligned with the SQR Rubric Ratings, where the scores range from 1 (low) to 4 (high): 1 = Emerging, 2 = Developing, 3 = Implementing, and 4 = Sustaining.

Figure 34: Board Core Competency Ratings

Core Competency	Description	Score
Board Composition	Board members possess a diversity of backgrounds and an array of appropriate and relevant skills with which to oversee the school/CMO.	3.0
Mission Alignment	Board members have a shared understanding of and commitment to the school's mission and vision.	3.7
School Familiarity	Board members are knowledgeable about the school's operations, successes, and challenges.	3.3
Role Familiarity	Board members demonstrate an understanding of their role in providing oversight to the charter school.	3.7
Community Engagement	Board members actively engage with school staff, families, and community members in order to govern effectively.	3
Accessibility	All governing board meetings are accessible to the community and the decision-making process is clear and transparent.	3.7
Compliance	The board complies with (and has systems in place to ensure compliance with) its own board policies and bylaws as well as with applicable state and federal laws regarding governance. The board is free of real or perceived conflicts of interest.	4
Effectiveness	The governing board is an effective decision-making body which is active and meets its governance obligations.	3

Source: Staff evaluation of Charter School performance report, Charter School renewal petition, Charter School board member self-evaluations, Charter School board member interview, Charter School board observations

F. Staffing and Teacher Credentialing

Education Code sections 47605(l)(1) and 47605.4 require all charter school teachers to hold the credential required for their assignment. Pursuant to Education Code Section 44258.9, all charter schools must participate in annual teacher assignment monitoring through the California Statewide Assignment Accountability System (“CalSAAS”). The OUSD Office of Charter Schools acts as the “Monitoring Authority” for all charter schools authorized by OUSD, which requires the annual review of educator assignments. The figures below represent the CalSAAS results for educator assignments in the 2023-24 school year, the most recent year for which data is available. As shown below:

- During the 2023-24 school year, the majority of assignments at ACA were authorized by an educator holding a clear or preliminary credential or by an internal credential. Approximately 22.2% of assignments were considered “Ineffective”, or were authorized by an emergency credential, variable term waiver, or substitute permit, which is below the OUSD average and represents 1 physical education assignment.
- During the 2023-24 school year, there were only 4 total misassignments at ACA out of 71 total assignments.

Figure 35: 2023-24 Educator Credentials by Type

	Charter School	OUSD (K-6 Only) ²⁰
Clear <i>Authorized by clear or preliminary credential or by local assignment option</i>	55.6%	58.9%
Intern <i>Authorized by intern credential</i>	11.1%	1.8%
Out-of-Field <i>Authorized by GELAP, SELAP, short-term waiver, emergency EL permit, or Local Assignment Option</i>	0.0%	0.5%
Ineffective <i>No legal authorization or authorized by emergency credential (PIP, STSP), variable term waivers, or substitute permits</i>	22.2%	37.5%
Incomplete <i>Missing or incorrect information was reported to CALPADS about the assignment</i>	0.0%	1.2%

Source: CDE Teaching Assignment Monitoring Outcomes by FTE Report

Figure 36: 2023-24 California Statewide Assignment Accountability System (“CalSAAS”) Results

Misassignments by Setting		Misassignments by Core Subject	
General Education	2	Phys Ed	1
English Language Development	2	Self Contd	1

Source: 2023-24 CalSAAS Monitoring Audit Report

In addition to the CalSAAS results, the Charter School submitted information regarding educator retention as part of its Renewal Performance Report. As shown below:

- The Charter School has retained the majority of its educators every year of the charter term.
- The Charter School has had minimal early separations over the course of the charter term.

²⁰ The 2023-24 Teaching Assignment Monitoring Outcomes report on CDE Dataquest only disaggregates data into K-6, 6-9, 9-12, or K-12. Therefore, K-6 was chosen as the most similar comparison point to ACA.

Figure 37: Educator Retention Over Time (Self-Reported)

	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
Percent of Educators Retained from Prior Year	100%	80%	82%	81%	93%	92%	83%
Early Separations	2/19	0/16	2/16	1/13	0/13	1/12	-

Source: Charter School Renewal Performance Report

III. Renewal Criteria III: Is the Petition Reasonably Comprehensive?

In order for a charter school’s renewal petition to be approved, the petition must include all of the following, which are described in detail in this section:

- Reasonably comprehensive descriptions of all 15 required elements
- All other information required by the Ed Code
- All OUSD-specific requirements

Evidence considered for this criterion includes a review of the corresponding sections of the charter petition, including changes made from the prior petition, as well as checks for any additional requirements enacted since the charter was last approved.

A. The Required Fifteen Elements

All charter petitions must include a “reasonably comprehensive” description of 15 required elements related to the school’s operation.²¹ The following table summarizes staff findings related to whether this standard was met for each element.

Figure 38: Petition Element Analysis

Element	Reasonably Comprehensive?
1. Description of the educational program of the school, including what it means to be an “educated person” in the 21st century and how learning best occurs.	Yes
2. Measurable student outcomes	Yes
3. Method by which student progress is to be measured	Yes
4. Governance structure	Yes
5. Qualifications to be met by individuals employed at the school	Yes
6. Procedures for ensuring health and safety of students	Yes
7. Means for achieving a balance of racial and ethnic, English learner, and special education students	Yes
8. Admission policies and procedures	Yes
9. Manner for conducting annual, independent financial audits and manner in which audit exceptions and deficiencies will be resolved	Yes
10. Suspension and expulsion procedures	Yes
11. Manner for covering STRS, PERS, or Social Security	Yes
12. Attendance alternatives for students residing within the district	Yes
13. Employee rights of return, if any	Yes
14. Dispute resolution procedure for school-authorizer issues	Yes
15. Procedures for school closure	Yes

Source: Ed Code §47605(c)(5) subsection (A) thru (O) and staff analysis of the charter renewal petition

²¹ EC §47605(c)(5)

B. Other Required Information

In addition to the required 15 elements, the Education Code also requires all charter petitions to include the following information.

Figure 39: Other Required Information

Required Information	Included in Petition?
An affirmation of each of the conditions described in EC §47605(h).	Yes
A declaration of whether or not the charter school shall be deemed the exclusive public employer of the employees of the charter school for purposes of Government Code §3540 through 3540.2 (California's public school collective bargaining law).	Yes
Information regarding the proposed operation and potential effects of the charter school on the authorizer, including: • The facilities to be used by the charter school, including specifically where the charter school intends to locate. • The manner in which administrative services of the charter school are to be provided. • Potential civil liability effects, of the charter school on the authorizer.	Yes
Financial statements that include the annual operating budget and 3-year cashflow and financial projections, backup and supporting documents and budget assumptions (i.e. anticipated revenues and expenditures, including special education, and projected average daily attendance).	Yes
If the school is to be operated by, or as, a nonprofit public benefit corporation, the petitioner shall provide the names and relevant qualifications of all persons whom the petitioner nominates to serve on the governing body of the charter school.	Yes

Source: Ed Code §47605(c)(4), §47605(c)(6), and §47605(h); staff analysis of the charter renewal petition

C. OUSD-Specified Requirements

Figure 40: OUSD-Specified Requirements

OUSD-Specified Requirement	Included in Petition?
District Required Language	Yes

Source: Staff analysis of the charter renewal petition

IV. Renewal Criteria IV: Is the Charter School Serving All Students Who Wish to Attend?

In order for a charter school's renewal petition to be approved, the school must be serving all students who wish to attend.²² By State law, evaluation of this criteria is limited to consideration of two sources of information (1) State-provided enrollment data and (2) any substantiated complaints related to noncompliance with suspension/expulsion requirements included in law and/or the charter school's procedures. Denial under this criterion may only occur if (1) there is sufficient evidence in the abovementioned information sources demonstrating that the charter school is not serving all students who wish to attend and (2) the school has been given a reasonable opportunity to cure the violation. Therefore, evidence considered for this criterion includes:

- State-provided enrollment data
- Substantiated complaints and notices of concern related to noncompliance with suspension/expulsion requirements

²² EC §47607(e)

A. State-Provided Enrollment Data

State law mandates that, upon request, the State provide charter school authorizers with certain aggregate data, specified in the law, reflecting student enrollment patterns for authorized charter schools. The State does not provide any guidance regarding how this data should be interpreted. This data includes the following for each year of the charter term²³:

- **Data Set 1 (Mid-Year Exits):** The percentage of students enrolled at any time between the beginning of the school year and the census day who were not enrolled at the end of the same school year, and the average State test results for these students from the prior school year, if available.
- **Data Set 2 (Year-to-Year Exits):** The percentage of students enrolled during the prior school year who were not enrolled as of the census day of the school year in question (excluding students who completed the highest grade served by the school), and the average State test results for these students from the prior year, if available.

The tables below summarize the data provided by the State. To avoid exposing potentially personally identifiable information, State test results are excluded for any group with fewer than 11 students. Additionally, it is important to note the data provided is limited in that it can only show correlation, *not causation*. Therefore, while an analysis is included below, the data, on its own, cannot definitively show whether or not the school is serving all students who wish to attend. With this limitation in mind, the analysis is below:

- **Data Set 1 (Mid-Year Exits):** For the first set of data, students who left the Charter School performed below the Charter School's average for 2023-24. However, in 2022-23, students who left the Charter School performed above the Charter School's average. Across the years of available data, the difference does not appear to be substantial or consistent enough to suggest that the school is not serving all students who wish to attend. *However, the increasing percentage of mid-year exits does raise concerns regarding the academic program at the school.*
- **Data Set 2 (Year-to-Year Exits):** For the second set of data, students who left the Charter School performed below the Charter School's schoolwide average for each year of available data in Math; however, these students performed at or above the schoolwide average in ELA. The difference does not appear to be substantial or consistent enough to suggest that the school is not serving all students who wish to attend. *However, the school's high percentage of year-to-year exits raises concerns regarding the academic program at the school.*

Figure 41: Charter School Enrollment Data – Education Code Section 47607(d)(1)(B)

Data Set 1: Mid-Year Exits	2018-19	2019-20	2022-23	2023-24
Percent of students enrolled at the Charter School between start of the school year and census day who were not enrolled at the end of the school year	5.84% (17 of 291)	10.39% (32 of 308)	15.45% (36 of 233)	26.53% (65 of 245)
Number of these students with State test results from the prior year	2	19	29	ELA: 36 Math: 37
ELA: Difference between average DFS of unretained students and schoolwide average	*	-4.04 Unretained = -65.84 School = -61.8	+7.44 Unretained = -103.86 School = -111.3	-26.94 Unretained = -127.14 School = -100.2
Math: Difference between average DFS of unretained students and schoolwide average	*	-12.42 Unretained = -66.42 School = -54	+22.13 Unretained = -91.17 School = -113.3	-23.13 Unretained = -110.43 School = -87.3

Source: Aggregate enrollment-pattern data provided by the State

²³ At the time of this report, the State provided data for 2016-17 through 2019-20 and 2022-23 through 2023-24. Due to the impact of the COVID-19 pandemic, there was insufficient data available for the 2020-21 and 2021-22 school years.

* Data excluded due to an insufficient number of students with results for this group

Figure 42: Charter School Enrollment Data – Education Code Section 47607(d)(1)(C)

Data Set 2: Year-to-Year Exits	2018-19	2019-20	2022-23	2023-24
Percent of students enrolled at the Charter School during the prior school year who were not enrolled as of the census day for the specified year (excluding graduating students)	27.21% (80 of 294)	26.12% (76 of 291)	32.41% (82 of 253)	28.33% (66 of 233)
Number of these students with State test results from the prior year	59	49	ELA: 50 Math: 48	ELA: 49 Math: 48
ELA: Difference between average DFS of unretained students and schoolwide average	+17.32 Unretained = -24.98 School = -42.3	-1.73 Unretained = -63.53 School = -61.8	+8.76 Unretained = -102.54 School = -111.3	+1.32 Unretained = -98.88 School = -100.2
Math: Difference between average DFS of unretained students and schoolwide average	-22.76 Unretained = -73.47 School = -50.8	-26.49 Unretained = -80.49 School = -54	-13.88 Unretained = -127.18 School = -113.3	-18.53 Unretained = -105.83 School = -87.3

Source: Aggregate enrollment-pattern data provided by the State

B. Substantiated Complaints and Notices of Concern Related to Noncompliance with Suspension / Expulsion Requirements

During the current charter term, the Office of Charter Schools did not receive any substantiated complaints related to noncompliance with suspension and/or expulsion requirements for the charter school.

V. Recommendation Summary

To determine if the Charter School has adequately met each renewal criteria, Staff considered evidence gathered from the school's petition and supporting documentation, the site visit, and the school's performance during its previous charter term. The following section outlines the Charter School's identified strengths and challenges related to each renewal criteria, as well as a determination of whether the Charter School adequately met the criteria for purposes of renewal.

A. Renewal Criteria I: Has the Charter School Presented a Sound Educational Program?

Strengths	Challenges
• ELA proficiency and DFS have shown a strong post-pandemic upward trajectory. • Math proficiency and DFS have demonstrated substantial post-pandemic growth. • All student groups, with the exception of Students with Disabilities, have demonstrated substantial post-pandemic growth in average DFS in both ELA and Math. • The percentage of English Learners making progress towards English language proficiency has increased significantly post-pandemic, with a Green status on the ELPI indicator on the most recent Dashboard.	• Math and ELA proficiency remain below the District average. • The Students with Disabilities student group has shown declining DFS in both Math and ELA over the course of the charter term.

Determination: Based on this analysis, ACA has presented a sound educational program.

B. Renewal Criteria II: Is the Charter School Demonstrably Likely to Successfully Implement the Proposed Educational Program?

Strengths	Challenges
• The school remains at a sustainable enrollment size despite enrollment decline over the charter term. • The school appears to be in adequate fiscal condition, with an ending fund balance that appears sufficient. • The school has a low percentage of assignments considered "Ineffective" and a high teacher retention rate.	• Enrollment has declined substantially over the charter term. • Recent audit findings identified two material weaknesses in financial controls. • Enrollment projections appear overly optimistic, potentially leading to overestimated budget projections and revenue.

Determination: Based on this analysis, ACA is demonstrably likely to successfully implement the proposed educational program.

C. Renewal Criteria III: Is the Petition Reasonably Comprehensive?

Strengths	Challenges
- Charter petition contains reasonably comprehensive descriptions of the required 15 elements. - OUSD-specified requirements are included in the petition.	N/A

Determination: Based on this analysis, the petition for ACA is reasonably comprehensive.

D. Renewal Criteria IV: Is the School Serving All Students Who Wish to Attend?

Strengths	Challenges
- No evidence in State-provided enrollment data that suggests the school is failing to serve all students who wish to attend. - There have been no substantiated complaints or Notices of Concern related to noncompliance with suspension/expulsion requirements.	N/A

Determination: Based on this analysis, ACA is serving all students who wish to attend.

E. Analysis of Other Public School Options if Renewal is Denied

When determining whether to recommend denial, OCS Staff consider other public-school options available to the Charter School's current students, and denial findings for a Middle Tier school must demonstrate, in part, that closure is in the best interest of students²⁴. The following provides an overview of the attendance areas where ACA students live, where students who have transferred from the school enroll in the subsequent year, and how nearby schools serving elementary school students perform relative to ACA.

ACA Students Attendance Areas

Students attending ACA in 2024-25 lived in 21 different OUSD attendance areas. Additionally, 13 of its students reside outside of Oakland. The figure below shows all Elementary School Attendance Areas where at least 5% ACA of students lived.

Figure 43: 2024-25 Charter School Enrollment by Attendance Area and Grade Span

Attendance Area Grade Level	Attendance Area	Number of ACA Students Living in Attendance Area (Percent of Total Enrollment)
Elementary	PRIDE	85 (43.8%)
	MARKHAM	24 (12.4%)
	REACH	14 (7.2%)
	GREENLEAF	10 (5.2%)

Source: OUSD Department of Research, Assessment, and Data Live/Go Dashboard

²⁴ Ed Code 47607.2(b)(6)

Performance Comparison with Nearby Schools/Target Student Population Area

In order to evaluate the performance of ACA relative to other public-school options available to the Charter School's current students, the following list of comparison schools was created to include (A) any schools serving similar grade spans within the Elementary Attendance Area(s) for which at least 5% of students currently live and (B) any schools serving similar grade spans within the Elementary School Attendance Area (ESAA) for which the school is located. The figure below summarizes 2023-24 State test outcomes in terms of Distance from Standard (DFS), comparing outcomes to ACA. The figure also includes some demographic information from that same year for additional context. As shown in Figure 44:

- **ELA:** ACA had a DFS which was greater than 4 of 6 comparison schools.
- **Math:** ACA had a DFS which was greater than 5 of 6 comparison schools.

Figure 44: 2023-24 Performance Comparison of Nearby Schools

ESAA (Percent of Total Enrollment)	School	Grade Span	% SED	% EL	% SWD	ELA DFS	Math DFS
Pride (43.8%)	Aspire College Academy	K-5	93%	51%	13%	-68.8	-58.9
	East Oakland Pride	K-5	99%	60%	16%	-112.4	-125.3
Greenleaf (12.4%)	Greenleaf	K-8	96%	63%	11%	-75.5	-89.3
Markham (7.2%)	Markham Elementary	K-5	100%	61%	12%	-144.6	-140.1
Reach (5.2%)	Aspire Monarch Academy	K-5	85%	65%	14%	-66	-74.9
	Cox Academy	K-5	90%	55%	9%	-68	-53.5
	Reach Academy Elementary	K-5	100%	49%	10%	-83.4	-90.1

Source: English Learners – CDE Downloadable Data Files (School Enrollment, English Learners); Socioeconomically Disadvantaged/Special Education – CDE DataQuest School Enrollment by Subgroup Report; OUSD Special Education/Distance From Standard/CORE Growth Percentile – OUSD Department of Research, Assessment, and Data

F. Recommendation

Based on the analysis outlined therein, Staff recommends approval of the renewal petition for Aspire College Academy for 5 years, beginning July 1, 2026, until June 30, 2031), to serve students in Grades TK-5. In particular, the analysis in this report finds that the charter school has sufficiently met the requirements and criteria established in the California Charter Schools Act, which governs charter school renewals. If approved, staff additionally recommends the following as a benchmark for the OUSD Board to monitor progress on the challenges referenced:

- *If any Material Weakness is identified in ACA's or Aspire's annual audit report during the new charter term, the Charter School's governing board shall: a) provide a written remediation plan to the OUSD Board addressing the root cause of the finding, b) Upon completing the remediation plan, provide a written report to the OUSD Board documenting the implementation. At the discretion of OUSD Board leadership, verbal reports on these items may be scheduled to the OUSD Board.*

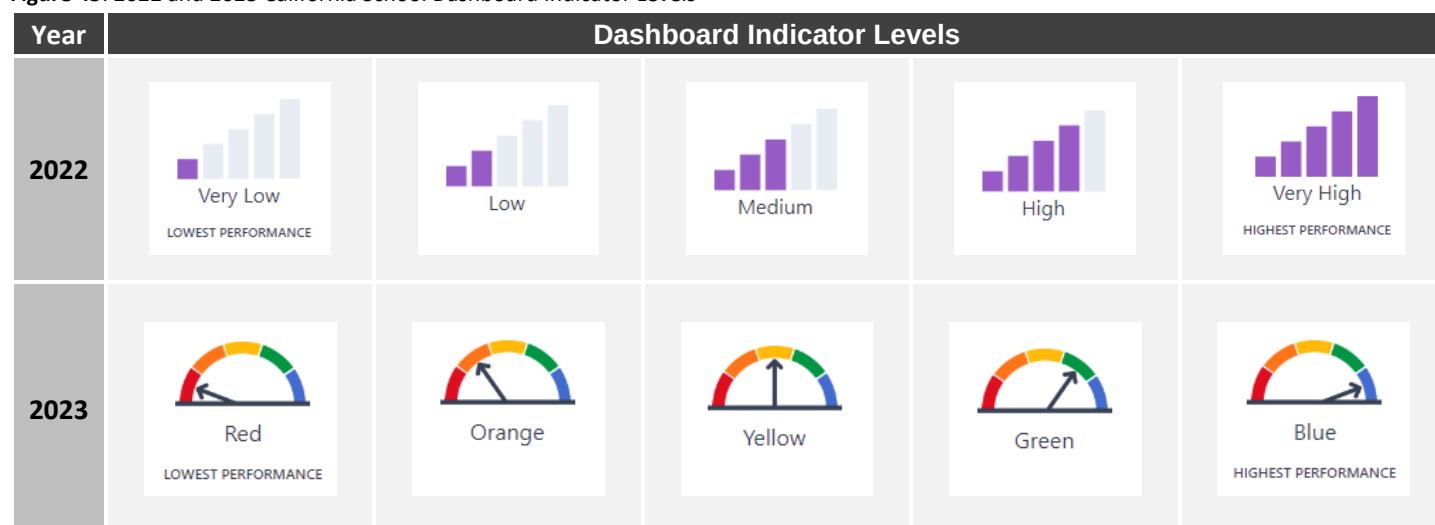
VI. Appendices

Appendix A. Additional California School Dashboard Analyses – including Local Indicators

Impact of COVID-19 Pandemic on California School Dashboard Indicators

Typically, the California School Dashboard displays colors for each indicator (see below) which are assigned based on two factors: the current year’s data and the difference between the current year’s data and the prior year’s data, or “Change”. Due to the impacts of the COVID-19 pandemic on statewide testing and accountability systems, there was insufficient data to calculate “Change” for the 2022 California School Dashboard, and thus the 2022 California School Dashboard displayed “Status levels” (Very High, High, Medium, Low, and Very Low) in place of colors. For purposes of the Renewal Tier Analysis and the School Performance Analysis, these Status Levels were used as proxies for color as shown below.

Figure 45: 2022 and 2023 California School Dashboard Indicator Levels



Source: California School Dashboard

The only exceptions to the categorization rules above are the Chronic Absenteeism and Suspension Indicators for which the 2022 scale is reversed such that “Very High” corresponds to the lowest performance, or the “Red” color. Additionally, there was insufficient data to assign a status level to the College and Career Readiness indicator for the 2022 California School Dashboard, so the indicator is not available for the 2022 California School Dashboard and is categorized using a status level, not a color, for the 2023 California School Dashboard. For more information about the California School Dashboard, please visit the CDE’s support page at www.cde.ca.gov/ta/ac/cm/index.asp.

California School Dashboard Local Indicators

Charter schools are required to report annually on five State Board of Education (SBE)-approved local indicators aligned to State priority areas where other State data is not available. In order to meet each local indicator, the SBE requires charter schools to (1) annually measure their progress based on locally available data, (2) report the results at a public charter school board meeting, and (3) report the results to the public through the California School Dashboard. The school uses self-reflection tools included within the California School Dashboard to report its progress on the local indicators. If a charter school does not submit results to the California School Dashboard by the given deadline, including completing the self-reflection tool, the school's California School Dashboard will reflect *Not Met* for the indicator by default. Earning a performance level of *Not Met* for two or more years for a given local indicator may be a factor in being identified for differentiated assistance, provided by an outside agency (typically the county office of education) as required by State law.²⁵

Figure 46: California School Dashboard Local Indicators

Local Indicator	2018	2019	2022	2023	2024
Basics: Teachers, Instructional Materials, Facilities	Met	Met	Not Met	Met	Met
Implementation of Academic Standards	Met	Met	Not Met	Met	Met
Parent and Family Engagement	Met	Met	Not Met	Met	Met
Local Climate Survey	Met	Met	Not Met	Met	Met
Access to a Broad Course of Study	Met	Met	Not Met	Met	Met

Source: California School Dashboard

2023-24 California School Dashboard Indicators Determined for “Informational Purposes Only”

The 2023-24 California School Dashboard included three additional Indicators which are to be used for “informational purposes only”. While OCS Staff did not consider these indicators as part of the analysis to determine the renewal recommendation included in this report, the results have been included below for informational purposes only.

Figure 47: California School Dashboard Indicators – “Informational Purposes Only”

ELA Growth	Math Growth	Science
 Students at ACA generally scored 5 points below the typical growth of students with similar test scores in the previous grade level.	 Students at ACA generally scored 3 points below the typical growth of students with similar test scores in the previous grade level.	 Students at ACA had an average DFS of 29.1 points below standard, a 1 point decrease from the prior year, on the California Science Test.

Source: California School Dashboard

²⁵ Detailed criteria for differentiated assistance can be found at <https://www.cde.ca.gov/ta/ac/cm/leaproposedcrit.asp>.

Appendix B. Additional Program Implementation Information

Proposed Charter School Projected Student Enrollment and Grade Levels Served (as outlined in petition)

In its renewal petition (pg. 32), ACA is proposing to serve a projected student enrollment at each grade level, and at all grade levels combined, in each of the years of the term of the Charter as follows:

Figure 48: Projected Enrollment

Projected Student Enrollment for Each Year by Grade Level and Total Enrollment					
Grade Level	Year 1	Year 2	Year 3	Year 4	Year 5
TK	20	20	20	20	40
K	48	48	48	24	24
1	26	52	52	52	26
2	28	28	56	56	56
3	30	30	30	60	60
4	60	30	30	30	60
5	30	60	30	30	30
Total	242	268	266	272	296

Source: ACA renewal petition

Admissions Preferences

In the event of a public random drawing, the ACA admissions preferences are as shown below:

Figure 49: ACA Admissions Preferences

#	Admissions Preference
1	All students who seek to continue their preparation and readiness for college from other Aspire schools.
2	Children of Aspire Regular, Full-time employees.
3	Siblings of students already admitted to the Charter School.
4	Children of founding families of the Charter School.
5	Children residing within the District.
6	All other students who reside in the state of California.

Source: ACA renewal petition

Charter School Enrollment Demographics Over Time

Figure 50: ACA Enrollment Demographics

Student Group Type	Student Group	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Ethnicity	Hispanic/Latino	65.7%	63.8%	66.1%	67.4%	69.2%	68.5%	66.5%
	Black/African American	26.9%	29.0%	27.3%	25.8%	22.9%	23.2%	21.8%
	Asian	0%	0.3%	0.4%	0.4%	0.5%	0.5%	0.5%
	White	0%	0%	0%	0%	0%	0%	0%
	Two or More Races	1.7%	3.1%	2.6%	3.0%	2.5%	2.5%	2.4%
	Other Race/Ethnicity	0.7%	1.0%	1.1%	0.4%	1.0%	1.9%	1.9%
	Not Reported	4.9%	2.7%	2.6%	3.0%	4.5%	4.4%	6.8%

Other Student Groups	Socioeconomically Disadvantaged	88.5%	87.7%	85.6%	79.4%	92.5%	93.1%	96.1%
	Homeless Youth	0.0%	0.0%	0.0%	0.0%	0.0%	3.4%	3.4%
	Foster Youth	1.7%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	English Learners	32.9%	34.5%	34.7%	37.3%	53.2%	50.7%	45.6%
	Special Education	10.8%	11.3%	11.8%	12.9%	13.9%	13.3%	14.6%

Source: ETHNICITY/SOCIOECONOMICALLY DISADVANTAGED/ENGLISH LEARNERS/SPECIAL EDUCATION – CDE Dataquest (School Enrollment by Subgroup Report)

Stability Rate

The figure below shows the Charter School’s stability rate as reported by the California Department of Education. For this metric, students are determined to have a “stable” enrollment during the academic year if the enrollment record is a minimum of 245 consecutive calendar days at the same school without a disqualifying exit.

Figure 51: Annual Student Stability Rate

	2019-20		2020-21		2021-22		2022-23		2023-24	
	Stability Count	Stability Rate	Stability Count	Stability Rate	Stability Count	Stability Rate	Stability Count	Stability Rate	Stability Count	Stability Rate
Schoolwide	286	93.2%	265	97.1%	215	85.0%	197	84.5%	188	76.7%
African American	81	92.0%	74	98.7%	56	91.8%	45	86.5%	43	71.7%
Hispanic or Latino	187	94.4%	173	96.1%	143	83.1%	136	84.0%	127	77.4%
English Learners	101	92.7%	100	96.2%	101	84.9%	105	83.3%	96	76.2%
Students with Disabilities	39	97.5%	37	97.4%	39	95.1%	40	95.2%	33	80.5%
Socioeconomically Disadvantaged	256	95.5%	230	97.5%	172	86.9%	184	86.8%	176	78.9%

Source: CDE DataQuest

Charter School Educator Credentials

Figure 52: Educator Credentials by Type Over Time

	2021-22	2022-23
Clear <i>Authorized by clear or preliminary credential or by local assignment option</i>	65.2%	55.6%
Intern <i>Authorized by intern credential</i>	8.7%	11.1%
Out-of-Field <i>Authorized by GELAP, SELAP, short-term waiver, emergency EL permit, or Local Assignment Option</i>	0.0%	0.0%
Ineffective <i>No legal authorization or authorized by emergency credential (PIP, STSP), variable term waivers, or substitute permits</i>	26.1%	33.3%
Incomplete <i>Missing or incorrect information was reported to CALPADS about the assignment</i>	0.0%	0.0%

Source: CDE DataQuest

2025-26 Charter School Educator Demographics

Figure 53: 2025-26 Educator Demographics

Race / Ethnicity	2025-26
Hispanic/Latino	33%
Black/African American	33%
Asian	8%
White	25%
Other Race/Ethnicity	0%

Source: Charter School Performance Report

Charter School Complaints to OUSD

The OUSD Office of Charter Schools logs the complaints it receives for OUSD-authorized charter schools. However, unless the allegations identify a potential violation of their charter petition or of local, state, or federal law, the Office of Charter Schools typically refers the complainant to school leadership, who is ultimately responsible for addressing the complaint in compliance with its adopted complaint policy. Therefore, complaints included in the table below may not necessarily have been substantiated. Instead, the table is a record of what has been reported to the Office of Charter Schools staff. Additionally, some complainants may not know that they can submit complaints to the Office of Charter Schools. Therefore, the absence (or a low number) of complaints does not necessarily mean that other complaints were not reported directly to the school or charter management organization.

During the current seven-year charter term, the Office of Charter Schools received 3 complaints regarding ACA and 0 complaints regarding the charter school's CMO.

Figure 54: ACA Complaints to OUSD

School Year	Complaints	Areas of Concern
2018-19	0	
2019-20	1	Disenrollment (<i>Not substantiated</i>)
2020-21	0	
2021-22	1	Covid, Student Health and Safety
2022-23	0	-
2023-24	1	Student Health and Safety
2024-25	0	-
2025-26	0	-

Source: OUSD Office of Charter Schools Complaint Records as of August 1, 2025

*Complaint was substantiated by the Office of Charter Schools and led to the issuance of a Notice of Concern

Charter School English Learners by Language

Figure 55: 2024-25 Language Group Data

Language	English Learners (EL)	Fluent English Proficient (FEP) Students	Percent of Total Enrollment that is EL and FEP
Spanish; Castilian	86	19	50.97%
Uncoded languages	3	2	2.43%
Mayan languages	4	0	1.94%
Arabic	1	0	0.49%

Source: CDE Dataquest

Appendix C. Charter Management Organization's Key Fiscal Indicators

Financial Indicator	2018-19 Audited	2019-20 Audited	2020-21 Audited	2021-22 Audited	2022-23 Audited	2023-24 Audited
Annual Net Surplus or (Deficit) <i>Indicates whether the school spent more or less than it received in revenue during the year. Deficits are shown in parentheses.</i>	(10,014,593)	(9,731,501)	33,256,941	4,962,938	35,033,374	(18,965,452)
Ending Fund Balance <i>Typically represents unrestricted funds, although in some cases, restricted funds that were not fully spent in previous years may be included.</i>	84,871,238	75,139,737	108,396,678	113,359,616	148,392,990	129,427,538
Debt Ratio <i>A ratio less than 1 indicates the school has lower debts than assets, representing a lower level of financial risk.</i>	0.68	0.71	0.69	0.73	0.68	0.70
Budgetary Reserve <i>Given the school's ADA, FCMAT prescribes a minimum 4% reserve (calculated as Unrestricted Net Assets / Total Expenditures) as a set aside to prepare for potential liabilities. Reserve rates below this rate indicates poor financial condition.</i>	31%	28%	45%	37%	32%	27%
Cash Reserve <i>FCMAT recommends 5%+ cash reserve of the total of all budgeted expenditures (calculated as Unrestricted Cash / Total Expenditures). Below 5% is indicative of a poor financial condition.</i>	16%	11%	16%	21%	34%	25%

Source: 2018-19 through 2023-24 Annual Audit Reports

Appendix D. Charter School Response to Notice of Concern re: 2023-24 Audit Findings

Please see following page.



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www.aspirepublicschools.org

March 13th, 2025

To Whom it May Concern:

On behalf of Aspire Board President Beth Hunkapiller, we write to respond to the attached "Notice of Concern" that was sent to us on February 14th, 2025 related to Audit Finding #2024--001.

As an initial matter, we wish to reiterate that Aspire Public Schools ("Aspire") takes seriously its responsibility to meet and exceed all laws and best practices when it comes to financial controls and reporting. Aspire has been operating charter schools for 25+ years, and during that time has proudly earned a reputation for the strength and integrity of its Fiscal Operations. We appreciate your questions in this regard and welcome the opportunity to share how we are addressing these concerns in an effort to continuously improve our systems.

Corrective Action Plan ("Title 2 CFR Section 200.302"): This pertains to an accidental recognition of a prepaid expense, which was offset by a mirrored line item in our Accounts Payable. This error had an immaterial impact on Aspire's overall financial statements, and net asset balance (~\$24k net asset impact, which equates to less than 0.02% of Aspire's total net assets as of 6/30/2024). To prevent a reoccurrence of this error, we have instituted an additional check and review step to our regular prepaid expense review process, which will ensure that we correctly account for the timing of prepaid expenses entries, especially as it pertains to year-end timing. We are confident that this systemic corrective measure fully addresses this concern.

Corrective Action Plan ("Title 2 CFR Section 200.510(b)"): This pertains to an accidental misclassification of a funding source between federal and state funding when manually preparing the Schedule of Federal Awards. Please note that expenses were properly coded and allocated in our system of record at a resource code/funding source level, as well as at a State and Federal level. As a result, there was no impact to Aspire's overall financial statements. In order to prevent a reoccurrence of this error, going forward Aspire will clearly tag the funding source of resources codes in its financial system of record in a way that allows automated reporting to produce the Schedule, which will reduce the risk of human/manual error. We are confident that this systemic corrective measure fully addresses this concern.

Thank you again for the opportunity to provide the explanations and solutions outlined above. We welcome the opportunity to answer any further questions you may have regarding the above.

Sincerely,

DocuSigned by:

E449FDCC53B647D...

Michael Wimbish

Chief Financial Officer, Aspire Public Schools



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June 19th, 2025

VIA EMAIL:

timothy.ryan@ousd.org
kelly.kragarnold@ousd.org

Timothy Ryan-Conner, Accounting Manager
Oakland Unified School District
1011 Union Street, Site #947

Oakland, California 94607

Dear Mr. Ryan-Conner:

Aspire Public Schools ("Aspire") submits this response to the Oakland Unified School District's ("OUSD's") letter dated May 20, 2025 (the "May Letter"), which includes "follow-up inquiries and commentary" concerning Aspire's March 13, 2025 response (the "Aspire Response") to OUSD's Notice of Concern dated February 14, 2025 (the "Notice."). For reference, the May Letter, Aspire Response, and Notice are attached as Exhibits A, B, and C, respectively. The Notice and May Letter relate to Aspire Audit Findings #2024-001 and #2024-002.

Aspire remains committed to promptly and fully responding to all reasonable inquiries from OUSD, including those regarding its financial records, consistent with Education Code Section 47604.3. We emphasize that independent audits—such as those conducted for both Aspire and OUSD—are essential tools in identifying and correcting financial reporting issues. In Aspire's case, these audits have effectively led to meaningful corrective actions recommended by our independent auditors, which Aspire has consistently implemented.

That said, we are concerned by certain aspects of the May Letter, particularly the inclusion of unsubstantiated commentary. For example, the assertion that Aspire's audit findings "cast doubt over Aspire's ability to prevent fraudulent reporting and misappropriation of assets" is not only inconsistent with the Independent Auditor's report, but also excessive.

Such commentary contradicts the professional assessment of Aspire's independent auditor, who is best positioned to evaluate the significance of audit findings. If OUSD's position is that the existence of a material weakness automatically implies an inability to prevent fraud or misappropriation, that logic would appear to apply equally to OUSD's own repeated findings, as well as to those of other LEAs. This conclusion is neither accurate nor reasonable. Furthermore, it is unclear how Aspire could reasonably refute a conclusion that is stated as a subjective perception of doubt.

We are also concerned about the potential implications of the Notice of Concern in the context of upcoming charter renewal proceedings. As explained in further detail below, whether Aspire's audit findings raise doubt



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about future financial reporting is a matter for the qualified auditors to determine. We strongly object to the use of unsupported and alarming terms such as “fraudulent financial reporting” or “misappropriation of assets” in connection with Aspire’s schools when there is no basis for use of that terminology, especially given that the audit findings at issue are similar to those found in OUSD’s own audits.

To be clear, Aspire’s independent auditor has not concluded, suggested, or implied that Audit Findings #2024-001 and #2024-002 jeopardize the fiscal health of Aspire’s charter schools or rise to the level of a substantial fiscal factor. If OUSD intends to characterize them as such, now or at any time in the future, we respectfully request a meeting before July 11th so our respective financial teams can review the findings together, discuss the corrective measures Aspire has implemented in partnership with our auditor, and place these findings in context with those commonly observed in OUSD and other LEAs. This collaborative review will help ensure a shared understanding of the nature and implications of the findings going forward.

Resolving these issues before charter renewal is essential, given the high stakes for Oakland families who deserve to choose the schools that best serve their children. If OUSD believes this response does not fully address the concerns raised in the Notice and the May Letter, please inform us as soon as possible, so we may collaboratively address any remaining issues in a timely and transparent manner.

Additional Responses to Statements and Inquiries in the OUSD May Letter

Concerning Title 2 CFR Section 200.302:

OUSD Statement: GAAP prohibits the netting of assets and liabilities.

Aspire Response: Aspire’s financial statements plainly do not net assets and liabilities in violation of GAAP. The Aspire Response merely described the negligible *net financial effect* of a one-time accidental error in order to provide context and perspective essential to a fair understanding of the facts.

OUSD Inquiry #1: What is the nature and extent of the incremental, and/or modified, control attributes reviewer(s) now perform to detect balance sheet gross-ups in Aspire’s accounts payable and prepaid expenses?

Aspire Response to OUSD Inquiry #1: This inquiry relates to Aspire’s internal control attributes instituted to prevent the accidental overstatement of balance sheet accounts, specifically in relation to accounts payable and prepaid expenses. As detailed in the Aspire Response, this issue involved the inadvertent recognition of a prepaid expense due to incorrect payment date information—a timing issue. In response, Aspire has implemented incremental and modified control attributes designed to strengthen the detection and prevention of such misstatements:

- **Layered Review of Prepaid Expense Entries.** Aspire has instituted an additional check-and-review control step within its prepaid expense recognition process. Once initial invoice reviews are completed and a determination has been made regarding prepaid treatment, the Assistant Controller is now required to perform a secondary review specifically focused on verifying the actual payment date associated with



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each prepaid item. This step is designed to detect misalignments between the payment date and the accounting period of expense recognition.

Following this, the Controller independently reviews and confirms the Assistant Controller's entries as part of a second-level control. This two-tiered review structure ensures that no prepaid item is inappropriately classified based on incorrect timing assumptions.

Aspire has already implemented this new process, as described in the January 13th, 2025 Accounting Team Check Meeting Notes attached as Exhibit D.

- **Enhanced Reconciliation and Tracking Tool.** Aspire now utilizes an updated Prepaid Expense Reconciliation Document, including tracking of the timing of recognition of each pre-paid expense. This tool enables reviewers to easily compare recognition periods and confirm the accuracy of classification. By making the recognition timeline more transparent and traceable, the tool reduces the risk of duplicate entries or erroneous balance sheet impact. The updated reconciliation format is already in use and is included as Exhibit E.
- **Targeted Focus on Gross-Up Risk.** The revised control activities were developed with the specific risk of "gross-up" in mind, i.e., the risk that both accounts payable and prepaid expense accounts reflect the same obligation, thereby overstating liabilities and assets. The new procedures are designed to flag this scenario and require reconciliation prior to close, ensuring accurate financial statement presentation.

Concerning Title 2 CFR Section 200.510(b):

OUSD Inquiry #2: What control activities has Aspire implemented or modified to ensure that all resource codes are tagged with the funding sources and that the tagging is accurate and appropriate?

Aspire Response to OUSD Inquiry #2: This inquiry pertains to an inadvertent misclassification of a funding source during the manual preparation of the Schedule of Federal Awards. As detailed in the Aspire Response, Aspire has instituted the following:

- **System-Based Tagging Controls.** Aspire has fully transitioned to a system-generated Schedule of Federal Awards. All resource codes within Aspire's financial system of record are now configured with mandatory tags that classify each resource as either State or Federal. These tags are based on the applicable audit guide, and cannot be overridden manually without administrator review.
- **Validation and Reporting Logic.** The financial system now includes validation logic that cross-checks resource codes against predefined federal and state program lists and based on the audit guide. This allows for checks for inconsistencies prior to finalization of the Schedule. This ensures both completeness and appropriateness in classification.
- **Staff Training and Accountability.** To support successful implementation of these system enhancements, Aspire conducted targeted training for relevant accounting personnel on the updated tagging and



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reporting procedures during the Accounting Team Check meeting held on January 13th, 2025. (See Exhibit D.) This training emphasized proper use of tagging functionalities, the critical importance of accurate classification, and how to use built-in system prompts and reports to verify data integrity.

- **Audit Trail and Review.** The automated process now generates an audit trail documenting all resource code assignments and any modifications. Aspire’s financial leadership reviews these audit logs periodically to ensure continued compliance and to identify any anomalies that may warrant follow-up.
- **Sample.** A sample screenshot from our accounting system is included below to illustrate this functionality. Aspire’s financial system uses coded indicators—such as “(F)” for Federal—to clearly identify funding sources at the resource code level. In the example provided, the “(F)” next to Title I confirms its proper designation as a federal funding source.

A screenshot of a web-based accounting system form. The form has a white background with a thin border. It contains four fields: "Segment:" with a dropdown menu showing "Resource", "Code:" with a dropdown menu showing "3010", "Title:" with a text box containing "(F)IASA:Title I Basic Grants Low-Income an", and "Short Title:" with an empty text box. The form is centered on a black background.

Segment:	Resource	Code:	3010
Title:	(F)IASA:Title I Basic Grants Low-Income an		
Short Title:			

Through these layered controls—system enhancements, process validations, team training, and oversight—Aspire has taken a comprehensive approach to ensure compliance, accuracy, and reliability in its reporting of funding classifications.

OUSD Inquiry #3: What control activities has Aspire implemented or modified to ensure that the financial statement reviewer(s) confirms the completeness, accuracy, and appropriateness of the report parameters or database queries used to generate automated reports that underlie the footnotes and supplemental schedules accompanying the financial statements?



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Aspire Response to OUSD Inquiry #3: This inquiry likewise concerns the accidental funding source misclassification addressed in OUSD Inquiry #2 above. In response to that issue, Aspire has implemented targeted control activities to ensure that the parameters and queries used to generate automated reports, particularly those that inform the footnotes and supplemental schedules accompanying the financial statements, are complete, accurate, and appropriate.

- **Development and Use of Standardized Report Protocols.** Aspire has created an instructional guide that specifies the correct reports, data sources, filters, and parameters to be used when compiling financial statement data. This instructional guide (attached as Exhibit F), establishes uniform protocols for generating automated reports and minimizes the risk of variation or human error during data extraction. Additionally, all financial disclosures and footnotes are reviewed by the Controller and Chief Financial Officer for accuracy and completeness.
- **Required Review of Report Parameters and Query Criteria.** Prior to the inclusion of any report data in financial statements, Aspire's financial reviewers must now perform a parameter and query review to verify the completeness and appropriateness of the data sets used. Reviewers confirm that the correct codes, timeframes, funding classifications, and report settings are applied, with cross-references to the standardized guides and checklist. This step ensures that automated reports reflect the intended data scope and structure, and that nothing is inadvertently omitted or misclassified.
- **Training and Internal Communication.** Aspire's finance and accounting teams have been trained on these protocols and the importance of report parameter verification as part of Aspire's internal training processes, with reinforcement during ongoing accounting team meetings. Reviewers understand that confirming the accuracy of database queries is a required control step—not a discretionary task.

These enhancements were specifically designed to address the risk of data misclassification or omission at the report generation stage. By standardizing report procedures, assigning clear review responsibilities, and documenting completion, Aspire ensures that the financial disclosures are based on data that is not only accurate, but also appropriately derived and fully supportable.

OUSD Inquiry #4: What control activities has Aspire implemented, or modified, to ensure that manual manipulation procedures of data sourced ERP system reports for the presentation of financial reporting is appropriate and accurate.

Aspire Response to OUSD Inquiry #4: This inquiry pertains to the same issue addressed in OUSD Inquiry #2—an isolated, unintentional misclassification of funding source data arising during manual handling of financial information. In response, Aspire has implemented a series of targeted control activities:

- **Restriction of Manual Manipulation to Formatting Only.** As set forth in the checklist and instructional guides, Aspire has instituted a policy limiting manual edits of ERP-exported data to formatting and presentation adjustments only (e.g., column alignment, font consistency, visual layout). No manual reclassification, reallocation, or recalculation of data is permitted outside the ERP system.



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- Side-by-Side Data Comparison and Totals Reconciliation. As part of the review process, preparers are required to retain a copy of the original ERP system report and compare it side-by-side with the formatted version used in the financial statements. Totals, subtotals, and key line items are checked to confirm they match exactly, ensuring the integrity of the underlying data remains intact. This reconciliation is now a required step in Aspire's reporting workflow.
- Reviewer Training and Oversight Emphasis. Aspire has emphasized this control during internal trainings, reinforcing that manual edits are not to be used for data manipulation, and that all financial reporting data must originate from source systems unless formally adjusted and documented through approved journal entries within the ERP.

These safeguards ensure that manual handling of financial statement components does not introduce errors or distortions into Aspire's financial disclosures. Aspire's control structure now provides clear boundaries on acceptable manual actions, mandates verification of data integrity, and documents each step of the process for accountability.

OUSD Statement: A material weakness of this nature (i.e., raised by a lapse in the segregation of duties) casts doubt over the Aspire's ability to prevent fraudulent financial reporting and misappropriation of assets and the sufficiency of financial management's oversight.

Aspire Response: Aspire respectfully disagrees with OUSD's commentary and choice of charged words. This statement is both inconsistent with the independent auditor's findings and conclusions, and mischaracterizes the nature of the audit findings. The terms "fraud" and "misappropriation" are very serious, and this type of loaded phrasing introduces unnecessary alarm without any evidentiary support.

- No Finding of Lapse in Segregation of Duties. Contrary to OUSD's assertion, neither Audit Finding #2024-001 nor #2024-002 concluded that there was a lapse in the segregation of duties. The independent auditor did not raise any concerns about management override or internal collusion. Rather, the finding stemmed from the absence of documented review by someone not involved in the preparation of the schedule. This error was promptly corrected prior to the final submission of the audit to applicable authorities.

Importantly, the final independent audit includes Aspire's implementation of the corrective actions recommended by the auditor. These actions, as described in both Aspire's formal response and this letter, have been put in place to prevent recurrence and strengthen review procedures.

- The Auditor's Characterization of the Finding. As clearly stated in the independent auditor's report:

"In planning and performing our audit of the financial statements, we considered Aspire's internal control over financial reporting...but not for the purpose of expressing an opinion on the effectiveness of Aspire's internal control. Accordingly, *we do not express an opinion on the effectiveness of Aspire's internal control.*" (emphasis added)



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The report further explains that a “material weakness” represents a situation where there is a reasonable possibility that a material misstatement might not be prevented or detected in a timely manner. It does not constitute a conclusion that fraud or misappropriation has occurred, is likely to occur, or that Aspire lacks effective financial oversight.

- OUSD’s Commentary Is Unsupported and Misleading. Aspire acknowledges that oversight bodies, such as OUSD, may reasonably rely on audit findings to guide future monitoring. However, that reliance must be rooted in the actual content of the audit, not in speculative or conclusory interpretations that extend beyond the auditor’s own language.

OUSD’s characterization of the material weakness as suggestive of Aspire’s inability to prevent fraud or misappropriation is not only unsupported by the audit itself, it also fails to acknowledge the corrective measures Aspire has implemented. Notably, the audit report does not question Aspire’s present ability to produce accurate financial statements after implementing these reforms. Rather than objectively assessing those measures, OUSD has issued a public-facing statement that casts unwarranted doubt on Aspire’s financial integrity, without additional evidence or auditor corroboration.

- Bond Market Context. Aspire is particularly concerned that OUSD’s statement, omitting reference to the corrective actions already taken, could mislead municipal bond investors. Aspire participates in the same public financing markets as OUSD, and statements of this nature can reasonably be expected to influence the judgment of current and prospective bondholders.

We would expect OUSD to understand, in light of its own obligations under Securities and Exchange Commission Rules 10b-5 and 15c2-12, that accurate, balanced, and complete statements are critical for market integrity. Because authorizer Notices and school responses can be expected to reach bond investors, we have a duty to be clear that we cannot acquiesce in OUSD’s provocative interpretation of the auditor’s findings. There is no aspect of the legitimate charter school oversight process that warrants such provocations.

- Comparison to OUSD’s Own Audit History. While Aspire does not seek to deflect responsibility by comparison, it is relevant that OUSD has experienced multiple and recurring material weaknesses in its own audits, including audit adjustments in the millions of dollars. For instance, OUSD’s 2021–2022 audit concluded that:

“Management personnel responsible for financial accounting and reporting did not consider all applicable accounting standards for governmental entities.”

This was repeated from finding 2020-006. Four out of OUSD’s five most recent years’ audits contain material weakness findings.

Aspire’s audit history, in contrast, reflects timely correction of a non-recurring issue and the absence of similar conclusions. Indeed, the most recent audit concluded:



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“In our opinion, Aspire complied, in all material respects, with the compliance requirements...that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2024.”

Once again, there is no basis for OUSD’s assertion that Aspire’s audit findings implicate fraud or misappropriation risk. No such findings or recommendations were made by the independent auditor, nor does the independent auditor’s report support such a perilous assertion. Aspire has responded diligently and transparently, implemented all corrective actions, and provided documentation to OUSD throughout this process.

OUSD Inquiry #5: What are the financial qualifications of the members serving on the Audit Committee?

Aspire Response to OUSD Inquiry #5: This inquiry requires some background and context. As a charitable organization operating primarily as an educational institution, Aspire is not required by law to have an audit committee. (Government Code, §§ 12583 and 12586(e)(2).) Nevertheless, consistent with our Bylaws, Aspire has voluntarily adopted and maintained an Audit Committee as part of its strong commitment to financial transparency, independent oversight, and governance best practices.

Even when an audit committee is legally required, there is no statutory mandate for a CPA or financial professional to serve on the audit committee. Rather, general financial literacy and/or a working understanding of financial reports is encouraged.

Current members of the Audit Committee and a summary of their financial qualifications are as follows:

- Beth Hunkapiller, Board Chair – Ms. Hunkapiller is a seasoned educator and public school administrator. Her background includes nearly two decades of service on the San Carlos School District Board of Trustees and leadership positions within California’s charter school system, such as founding the San Carlos Charter Learning Center. Ms. Hunkapiller was the Director of the Charter Schools Division at the California Department of Education and served ten years on the California Advisory Commission on Charter Schools, including two years as chair. While she does not hold formal accounting or financial certifications, Ms. Hunkapiller’s long-standing oversight of public education budgets and her leadership roles in educational organizations and state agencies have provided her with substantial experience in financial governance of California LEAs. Her expertise aligns with nonprofit audit committee best practices, which emphasize the importance of members being financially literate and having a strong understanding of the organization’s operations and governance policies.
- Veleta Allen (Savannah) – Ms. Allen is a seasoned accounting professional who previously served as Aspire’s Controller from 2010 to 2013. Ms. Allen’s experience spans both public and private sectors. She currently serves as Vice President of Finance and Human Resources at CodePath.org, an organization that is reprogramming higher education to create the most diverse generation of engineers, CTOs, and founders. Ms. Allen serves as a voice for the underserved and to support financial literacy in marginalized communities. She brings deep familiarity with nonprofit financial management, fund accounting, and federal and state compliance standards.



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- Kevin Lowry – Mr. Lowry is an accounting professional at a Big Four accounting firm, serving as Director in Advisory, Regulatory & Compliance. Mr. Lowry's background includes financial risk management and audits. Mr. Lowry's expertise contributes to the Audit Committee's ability to oversee Aspire Public Schools' financial reporting and compliance processes effectively.

This committee structure reflects Aspire's proactive approach to audit oversight, bringing together individuals with both institutional knowledge and independent financial expertise. Aspire will continue to uphold a high standard of fiscal accountability through the active engagement of this committee and its alignment with best practices in nonprofit governance.

OUSD Inquiry #6: What policies, procedures, and/or actions is the Aspire Board taking to ensure that the Board is routinely exercising financial oversight of financial reporting management?

Aspire Response to OUSD Inquiry #6: Aspire's Board of Directors maintains robust financial oversight through multiple, formal mechanisms.

- Quarterly Reviews of Aspire's Consolidated Financial Statements. The full Board reviews Aspire's consolidated financial statements at least quarterly, including revenue and expense trends, balance sheet metrics, and budget-to-actual variances. These reviews include discussion with management and opportunities for Board questioning and follow-up, giving Board members the opportunity to assess financial reporting processes and challenge assumptions or variances when needed.
- Audit Committee. The Board appoints the independent Audit Committee, which has two Board member seats. The Audit Committee meets at least twice annually to review internal controls, external audit results, and financial compliance matters. The Audit Committee also confers with Aspire's finance leadership and external auditors to assess reporting accuracy, control effectiveness, and audit follow-up actions. The full Board receives summaries and recommendations from the Audit Committee.
- Standardized Financial Reporting Package. Reports are delivered in a consistent, comprehensive format designed to facilitate informed Board discussion and financial governance. This format supports informed analysis and allows the Board to monitor trends, detect anomalies, and evaluate financial reporting quality over time.
- Board Materials and Pre-Meeting Reviews. All Board members receive financial reports in advance of meetings, enabling thoughtful preparation and analysis. This practice reinforces Board accountability in reviewing and overseeing financial reporting. Financial reports are prepared and reviewed to ensure timely oversight aligned with budget adoption, interim financial reporting, annual audit cycle, and tax reporting compliance deadlines.
- Board Approvals. The Board formally reviews and approves Aspire's annual budget prior to the start of each fiscal year. It also reviews and approves Aspire's fiscal control policy, including internal controls, authorized approvers, and approval limits. The Board also approves Aspire's annual audit and tax filings



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(the IRS Form 990 and CA Form 199, each of which is also reviewed by the Audit Committee). Each of these is a foundational component of financial reporting and internal control oversight.

OUSD Inquiry #7: What control activities has Aspire implemented and/or modified to ensure the control environment is regularly assessed to detect gaps in the segregation of duties and to design and implement control activities to address such lapses?

Aspire Response to OUSD Inquiry #7: As explained above, it is important to clarify that the error mentioned in the audit was not caused by a lapse in the segregation of duties. Notwithstanding, Aspire has implemented a layered system of control activities designed to proactively assess the control environment and mitigate risks, including those related to segregation of duties. The organization continuously monitors for potential vulnerabilities and regularly enhances its internal controls in numerous ways.

- **Periodic Policy and Procedure Reviews.** Aspire's finance leadership team conducts periodic reviews of fiscal policies and procedures to evaluate whether financial controls remain robust and appropriately segregated, including those governing approval authority, financial reconciliations, and role assignments. These reviews include reassessment of staff roles as needed.
- **Codified Segregation of Duties Policy.** Aspire's Fiscal Control Policy & Procedures explicitly outlines segregation of duties as a foundational control principle. The policy prohibits any individual from initiating, approving, and reviewing the same transaction, and requires separation between accounting/reconciliation functions and asset custody functions. This principle is applied consistently across Aspire's financial processes.
- **Design Authority for Segregation of Duties.** The Chief Financial Officer and Controller are specifically responsible for designing and enforcing segregation of duties across departments. These leaders implement structural safeguards to separate incompatible functions and continuously assess whether changes in staffing, technology, or procedures affect those safeguards.
- **System Access and Role-Based Controls.** Aspire's financial systems (e.g., MIP, Coupa, and Ultipro) enforce role-based permissions and dual custody to ensure that no user has unilateral access to critical financial workflows, such as cash disbursements, payroll modifications, or bank transfers.
- **Internal Audit and Independent Review Functions.** Aspire maintains an internal audit function under the Director of Operations, who conducts periodic school-site audits and control testing. This function provides a feedback loop to management on the effectiveness of segregation and oversight controls, independent of daily financial operations.
- **ERP Access and Role-Based Controls.** Aspire enforces role-based access controls across its financial and HR systems (MIP, Coupa, and Ultipro), ensuring that users can access only the functionality necessary for their role. Aspire's finance and IT teams review system access permissions and approval workflow configurations periodically, including ensuring dual control for high-risk processes such as wire transfers,



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payroll approvals, and journal entry postings. These controls help preserve appropriate segregation of duties and system integrity.

- **Training and Reassignment When Risks Are Detected.** If a role conflict is identified—whether through internal review or staffing change—Aspire adjusts workflows or reassigns duties immediately to preserve control integrity. Such adjustments are reviewed by senior finance staff.

These control activities demonstrate Aspire’s proactive, system-wide approach to ensuring that segregation of duties is maintained and that the control environment is regularly evaluated and continuously strengthened.

OUSD Inquiry #8: What control activities has Aspire implemented and/or modified to ensure all footnotes and schedules accompanying the financial statements are within the scope of the financial statement reviewer’s review?

Aspire Response to OUSD Inquiry #8: Aspire has implemented layered control activities to ensure that all footnotes and supplemental schedules accompanying the financial statements are fully reviewed, verified, and fall within the scope of Aspire’s financial statement review protocols. These controls include:

- **Multi-Level Review by Key Financial Officers.** All financial statement footnotes and supplemental schedules are reviewed and approved by three senior finance officials:
 - The Chief Financial Officer,
 - The Controller, and
 - The Assistant Controller.

Each reviewer examines the materials independently for completeness, accuracy, and alignment with the underlying financial data.

- **Source Report Cross-Referencing.** Each footnote and schedule is supported by source documentation from Aspire’s ERP systems (e.g., MIP for accounting data), ensuring that reported figures are tied directly to system-generated financials. This includes reconciliations for items such as prepaid expenses, federal awards, and internal allocations.
- **Review Prior to Audit Submission.** Prior to submission to the auditor or chartering authorities, Aspire’s Chief Financial Officer and Controller perform a final scope review to ensure that all required footnotes and schedules—including those related to compliance, allocations, and organizational structure—are properly included and internally validated.
- **Audit Committee Oversight.** Aspire’s Audit Committee reviews the full audited financial statements, including footnotes and schedules, prior to approving submission.



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Together, these control activities ensure that Aspire's financial footnotes and supplemental schedules are consistently within the scope of formal financial review procedures, synced to Aspire's internal controls in our financial policies.

OUSD Inquiry #9: What control activities has Aspire implemented and/or modified to ensure the Schedule of Expenditures of Federal Awards is complete and accurate?

Aspire Response to OUSD Inquiry #9: In addition to the system-level enhancements and tagging controls described in Aspire's Response to OUSD Inquiry #2, above, Aspire has implemented a series of cross-check and reconciliation procedures designed to ensure the completeness and accuracy of the Schedule of Expenditures of Federal Awards (SEFA).

- **Automated SEFA Generation with Embedded Resource Tagging.** Aspire now uses its financial system (MIP) to automatically generate the SEFA using resource codes that are system-tagged as federal. This eliminates reliance on manual reporting and ensures that federal expenditures are pulled directly from the ledger using accurate parameters. These codes are aligned to the audit guide classifications, and tagging cannot be modified without elevated system access. (See Inquiry #2 for additional detail.)
- **Cross-Classification Reconciliation of Revenue and Expenditures.** As an additional layer of control, Aspire's finance team performs a cross-check of revenues and expenditures by funding classification—Federal, State, Local, and Other—against total recorded revenues and expenditures. This reconciliation ensures that all federal transactions are captured and appropriately classified in the SEFA. Discrepancies are investigated and corrected prior to submission.
- **Three-Level SEFA Review and Certification.** Aspire's Assistant Controller, Controller, and CFO participate in the preparation and review of the SEFA, ensuring consistency with general ledger data, proper classification of federal awards, and alignment with supporting documentation. Each reviewer contributes to confirming the SEFA's completeness and readiness for audit submission.
- **Quarterly Federal Grant Reconciliation Procedures.** As documented in the Time & Effort Policy and federal grant reconciliation procedures in Aspire's Fiscal Control Policy & Procedures, Aspire's finance team performs quarterly reconciliations of federal program expenditures, comparing the Personnel Activity Reports to the actual payroll expenditure ledger to confirm reported time activity agrees to the budgeted funding distribution. Reconciliation occurs quarterly in July, October, January and April, to coincide with each budget or actuals reporting period. Variances are flagged and corrected during quarterly reconciliation. These reconciliations ensure that grant expenditures align with allowable use categories and are properly reflected in financial reporting and SEFA preparation.

These control activities provide a layered system of automated data integrity, manual verification, and leadership review, ensuring the SEFA is both complete and audit-ready in alignment with federal reporting expectations.

OUSD Statement: Please note that failure to comply with the above remedies, or repeated violations of a similar nature, may result in the District issuing a Notice of Violation under Education Code § 47607(d) [sic].



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Aspire Response: Education Code Section 47607(d) is about aggregate pupil enrollment patterns at a charter school, and appears to be the wrong citation. We believe OUSD may have intended to cite Education Code section 47607(g) regarding revocation of a charter being preceded by a Notice of Violation. We respectfully remind OUSD that a charter may be revoked only if the chartering authority finds, through a showing of substantial evidence, that the charter school did any of the following: (1) committed a material violation of any of the conditions, standards, or procedures set forth in the charter; (2) failed to meet or pursue any of the pupil outcomes identified in the charter; (3) failed to meet generally accepted accounting principles, or engaged in fiscal mismanagement; (4) violated any law. None of these applies to Aspire's Audit Findings #2024-001 and #2024-002. Such findings plainly do not violate the charter or law and have no impact on pupil outcomes. As for meeting GAAP, notwithstanding the presence of audit findings, the Aspire audit report confirms that "[t]he accompanying consolidated financial statements (financial statements) have been prepared in accordance with accounting principals generally accepted in the United States of America (U.S. GAAP)." The auditor's report on whether the financial statements audited were prepared in accordance with GAAP was "Unmodified," with "No" noncompliance material to financial statements noted. The auditor did not identify any concerns of "fiscal mismanagement" whatsoever, instead recommending Aspire enhance its close process to ensure all transactions are accounted for and implement procedures to accurately capture all federal award expenditures expended during the audited period. Aspire has done so.

A Notice of Violation would be unwarranted, and Aspire will invoke its due process rights in the event Aspire receives a Notice of Violation.

Thank you again for the opportunity to provide the responses set forth above. We appreciate our collaborative relationship with OUSD and we welcome the opportunity to answer any further questions you may have regarding the above. We believe Aspire's response fully addresses your concerns. We will consider the statements and inquiries in the May Letter to be resolved unless we hear otherwise from your team before fiscal year-end.

Sincerely,

DocuSigned by:

Michael Wimbish

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Michael Wimbish

Chief Financial Officer, Aspire Public Schools