

SANTA ROSA CITY SCHOOLS
STAFF REPORT ON PIVOT CHARTER SCHOOL NORTH BAY
CHARTER RENEWAL PETITION

Date Posted: December 2, 2025

The following provides a summary of the Santa Rosa City Schools (“District”) staff renewal report, including its findings of fact and recommendation, concerning the Pivot Charter School North Bay (“Pivot”) renewal petition (“Renewal Petition” or “Petition”).

Introduction and Procedural Background

Pivot has operated as a nonclassroom-based charter school under the authorization of Oak Grove Union Elementary School District since 2010. However, because Pivot operates facilities within the boundaries of Santa Rosa City Schools, it was required to either obtain advance approval from Santa Rosa City Schools to continue operating a facility within this District’s boundaries prior to submitting a renewal petition to its current authorizer, or submit a renewal petition to this District as a “continuing” charter school for review and consideration. (See Educ. Code § 47605(c)(5)).

Pivot was established as a charter school to serve at-promise students who are “slipping through the cracks” in a traditional educational program, students who have not been successful in a traditional school environment, and students who need more support to perform to their potential. With this stated mission, Pivot serves students with very low academic self-confidence, low test scores, low motivation, or a need for a small environment—all with the goal of helping them to “pivot” their attitudes toward school, learning, and their future. Pivot offers an individualized online curriculum coupled with personalized learning paths, communication, and oversight. Pivot currently serves a population of approximately 437 students in kindergarten (“K”) through twelfth grade, with the majority of its enrollment comprising high school-age students.

Since 2023, Pivot has participated in the Dashboard Alternative School Status (“DASS”) program, which holds alternative schools accountable for modified methods of measurement for accountability indicators, where applicable.

According to the most recent data available on the California School Dashboard (“Dashboard”), Pivot’s student population consists of 65.2% socioeconomically-disadvantaged students, 13% English Learners, 26.3% students with disabilities, and 1.4% foster youth. Pivot’s current charter term expires on June 30, 2026, and it is seeking a five-year renewal term commencing on July 1, 2026 and ending on June 30, 2031.

On September 24, 2025, the District received a copy of Pivot’s Renewal Petition, along with a signed certification from Jayna Gaskell, Lead Petitioner and Executive Director of the Roads Education Organization (the nonprofit public benefit corporation that operates

Pivot), deeming the Renewal Petition to be complete. Therefore, the District commenced the timelines under Education Code section 47605(b) based on this date.

On October 22, 2025, the District's Governing Board ("Board") held a public hearing to determine the level of support for the Renewal Petition by teachers, other District employees, and parents/guardians.

On December 17, 2025, the District's Board will hold a public hearing during which the Board will consider the admissions preferences included in the Renewal Petition and take action to either grant or deny the Renewal Petition.

As discussed in further detail below, District staff, in consultation with legal counsel, has conducted a comprehensive review of the Renewal Petition and Pivot's student academic achievement and performance utilizing the charter renewal criteria under Assembly Bill 1505 and codified in Education Code sections 47607 and 47607.2, including the alternative metrics developed by Pivot and its current district authorizer. Based on that review, District staff finds that Pivot qualifies for renewal for its proposed five-year charter term.

Charter Renewal Criteria and Findings of Fact

The consideration of a renewal petition requires the District to (1) determine whether the charter school meets applicable eligibility requirements using the accountability criteria under Assembly Bill 1505 (codified in Education Code sections 47607 and 47607.2) and reflected in the Dashboard, and (2) evaluate whether the renewal petition meets the standards and criteria set forth in Education Code section 47605. An analysis of these two components of the charter renewal process are addressed in detail below and include District staff's corresponding findings of fact.

1. Pivot Charter School North Bay's Eligibility for Renewal Based on Accountability Criteria / Findings of Fact

Education Code section 47607 provides that a "chartering authority may grant one or more subsequent renewals pursuant to subdivisions (b) and (c) and Section 47607.2." These provisions detail a three-tiered system that categorizes a charter school as a high-performing, middle-performing, or low-performing charter school. These classifications, however, do not apply to a charter school that qualifies under DASS.

The DASS program replaces the previously-administered Alternative Schools Accountability Model ("ASAM"). Under DASS, qualifying alternative schools are held accountable based on modified methods of measurement for the accountability indicators. The State Board of Education ("SBE") has approved a DASS one-year graduation rate indicator, which is based on the percent of students who attend an alternative high school, are enrolled in twelfth grade, and meet enrollment requirements.

Other than the graduation rate indicator, however, the SBE has not yet adopted or incorporated additional modified methods in the Dashboard for DASS schools.

To meet the eligibility criteria to participate in the DASS program, a charter school must have an unduplicated count of at least 70 percent of the charter school's total enrollment upon first entering that is comprised of high-risk student groups. These include students who are expelled, suspended more than 10 days in a school year, recovered dropouts, credit deficient, habitually truant, credit-deficient, foster and homeless youth, etc. Since 2023, Pivot has met this eligibility criteria to qualify as a DASS alternative school.

As a DASS alternative school, and for purposes of determining whether Pivot is eligible for renewal based on this designation, the District must consider Pivot's performance on:

- State and local indicators on the California School Dashboard, and
- Alternative metrics based on the student population served by Pivot

(See Education Code section 47607(c)(7).)

The charter authorizer may deny a charter school's renewal petition pursuant to Education Code section 47607(c)(7) only upon making written findings that set forth specific facts to support the findings and determination that the closure of the charter school is in the best interest of students.

b. Findings of Fact

The following include District staff's findings of fact concerning Pivot's designation as a DASS charter school.

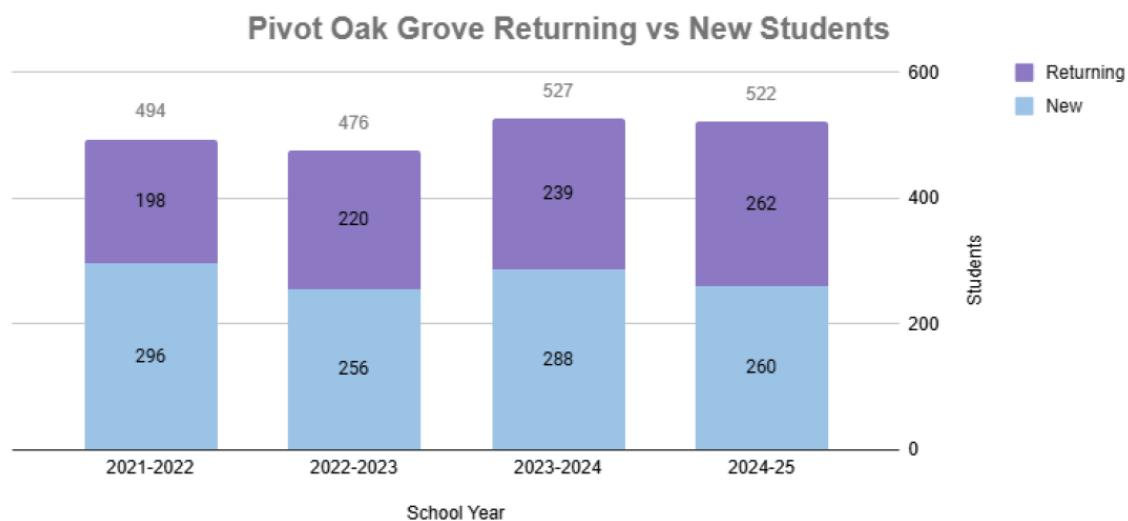
Finding of Fact No. 1: Pivot's performance on state and local indicators demonstrates overall that it is performing comparably and/or better than other DASS-qualifying schools serving a similar student population within the geographic region both schoolwide and among most student group populations.

The District has considered Pivot's performance on a schoolwide basis and among all student groups served by the charter school as identified on the Dashboard. District staff has determined that Pivot meets the minimum requirements to qualify for renewal as a DASS middle-performing charter school.

As indicated throughout the Renewal Petition, Pivot serves largely at-promise students who enroll in Pivot with very low academic self-confidence, low test scores, low motivation, or a need for a small environment. Moreover, Pivot recognizes that these students often require additional resources and support so that they can return to, and experience greater educational success in, a traditional school environment. According

to the Renewal Petition, Pivot serves a highly transient student population in which few students remain continuously enrolled at Pivot. More specifically, approximately one half of each school year's enrollment is comprised of new students. As a DASS school, and given the transiency and general makeup of its student population, Pivot subscribes to the belief that alternative metrics are necessary in measuring the academic growth of underserved students.

The chart below provides a comparison of the proportion of Pivot's returning students to new enrollees during each school year of its previous charter term. In the 2023-24 school year, approximately 55% of Pivot's students were new enrollees. Similarly, in the 2024-25 school year, approximately 50% of Pivot's population were new students. Pivot explained that the number of new enrollees each year heavily influences its charter school's academic renewal data and makes it difficult to evaluate sustained year-to-year improvements or declines, as further expressed in the analysis below.



With respect to student academic outcomes, Pivot's schoolwide performance in English Language Arts ("ELA") and Mathematics falls well below the state averages. Pivot's graduation rate and college/career indicator also remain well below the state averages, while its chronic absenteeism rate is far in excess of the state average. However, when comparing Pivot's state assessment scores with other DASS schools in Sonoma County in 2023-24, Pivot has demonstrated growth in both ELA and Math performance. Pivot outperformed half of the Sonoma County-based DASS schools in ELA (many of which also showed a decline in ELA scores). Additionally, in Math, Pivot surpassed the performance of most of the comparative DASS schools. Pivot also demonstrated gains in both career readiness and graduation rates during the 2023-24 school year, surpassing many DASS schools. (See Renewal Petition p. 22-26.)

On the most recent 2025 Dashboard, data shows that Pivot received the following performance levels on a schoolwide basis:

- English-Language Arts (“ELA”): **Red** (79.3 points below standard, with a decline of 14.5 points).
- Mathematics: **Red** (158.8 points below standard, with a decline of 17.1 points).
- English Learner Progress: **Red** (32% making progress, with a decline of 2.5%).
- Chronic Absenteeism: **Red** (42.7% chronically absent, with a maintain of .4%)
- Suspension Rate: **Blue** (.9% suspended at least once, with a decline of .8%)
- Graduation Rate: **Red** (54.5% graduated, maintained at -.3%)
- College/Career Indicator: **Orange** (12.8% prepared, maintained at 1%)

English Language Arts.

Pivot has shown a recent decline on a schoolwide basis in ELA, dropping from the “yellow” category to the “red” category between 2024 and 2025, respectively. When compared to its scores on the 2022 Dashboard—which did not receive performance colors due to the suspension of the California Assessment of Student Performance and Progress (“CAASPP”) and the lack of performance data for the 2019-2020 and 2020-2021 school years—Pivot experienced a decline in student academic achievement and performance in 2023, a slight increase in 2024, and then Pivot decreased to a new low in 2025.

The following chart shows Pivot’s performance on the 2022, 2023, 2024, and 2025 Dashboards in ELA both schoolwide and among its significant student group populations utilizing the “distance from standard” (or “DFS”) metric. This metric evaluates how far, on average, students are from the lowest possible score for meeting standards.

Student Group	2022 DFS ELA	2023 DFS ELA	2024 DFS ELA	2025 DFS ELA
All Students	-35.2 (Low)	-72.7	-64.8	-79.3
Hispanic	-70.5 (Very Low)	-72.6	-82.5	-85.9
White	-1.8 (Medium)	-66.3	-60	-95.8
Two+ Races	N/A	-124.2	N/A	-47.3
English Learners	N/A	-113.7	-118.7	-128.2
Socioeconomically Disadvantaged	-77.8 (Very Low)	-96.1	-73.7	-67.3
Students with Disabilities	-81.5 (N/A)	-137.6	-115.3	-111
Long-Term English Learners	N/A	N/A	-120	-161.1

As reflected above, student performance declined in almost all categories between the 2024 and 2025 ELA administrations of the CAASPP, which is concerning. However, Pivot experienced moderate gains in the Socioeconomically Disadvantaged and Students with Disabilities groups, which is promising—especially given that 65.2% of

Pivot's students are socioeconomically-disadvantaged and 26.3% of Pivot's students have disabilities.

The following chart provides an additional snapshot of Pivot's performance over the 2023-24 school year compared to other DASS schools in Sonoma County. Pivot experienced a +7.9 point improvement, outperforming most County DASS schools.

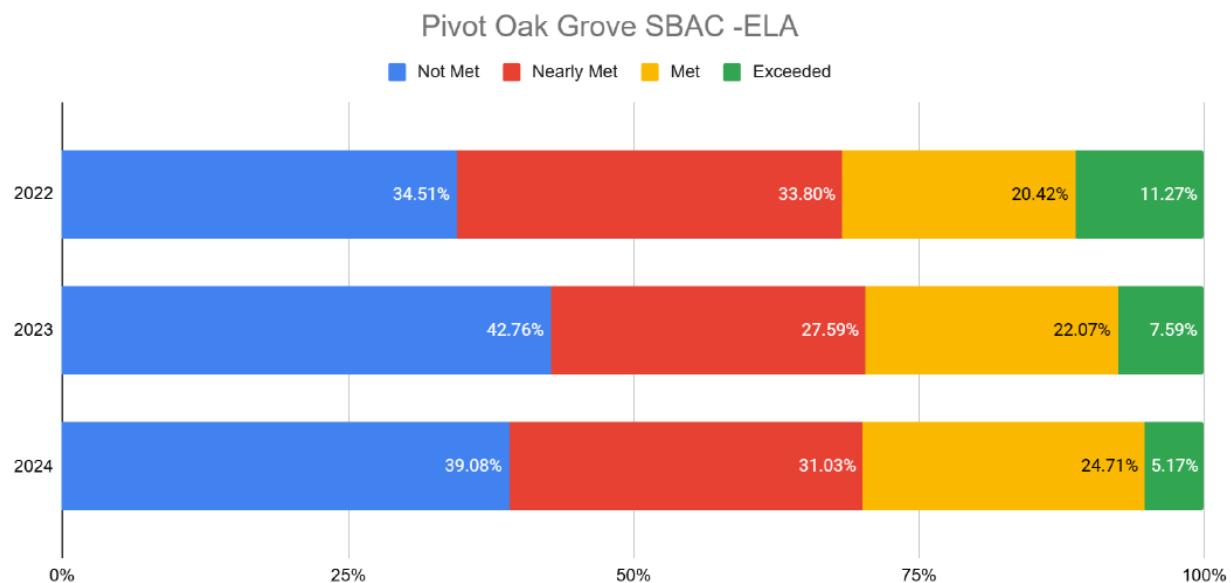
School	ELA 2023-24 (Points below standard)	Change in Points
Buena Vista High	130.9	+51
Carpe Diem High (Continuation)	69.4	-83.2
Creekside High	206.5	+45
El Camino High	No data	
Johanna Echols-Hansen High (Continuation)	No data	
Laguna High	240.5	-79.1
Marce Becerra Academy	223.2	-29.4
Pivot Oak Grove	64.8	+7.9
Ridgway High (Continuation)	201	-12.5
Rincon Valley Partnership	155.2	-102.5
San Antonio High (Continuation)	87.7	+28.1
Santa Rosa City Schools	45.8	+8
Sonoma County Alternative Education Programs	196.3	+28.9
Sonoma County Court	No data	
Sonoma County Special Education	264.8	-9.3
Sonoma Mountain High (Continuation)	No data	
West Sonoma County Consortium	21.1 above	+29.9
Windsor Oaks Academy	215.9	

When comparing Pivot's performance against the state averages on the 2025 ELA portion of the CAASPP, Pivot scored well below the state average in every student group. However, the District recognizes that these scores do not take into account Pivot's alternative school status.

Student Group	2025 DFS ELA (State)	2025 DFS ELA (Pivot)
All Students	-8.1	-79.3
Hispanic	-33.7	-85.9
White	23.8	-95.8
Two+ Races	29.4	-47.3
English Learners	-59.9	-128.2
Socioeconomically Disadvantaged	-35.3	-67.3
Students with Disabilities	-89.4	-111
Long-Term English Learners	-104.5	-161.1

As shown in the graph below, Pivot's ELA performance also demonstrated a slight increase in students who met or exceeded standards from 2023 to 2024, rising from

29.66% to 29.88%. However, it should be noted that only 138 Pivot students took the ELA portion of the CAASPP in 2024, given that the majority of Pivot's students are in high school and the ELA portion is only administered in grades 3-8 and 11.



While the District recognizes the contributing factor of Pivot's high transiency and turnover rate among students enrolled in the charter school from year to year, the District expects Pivot to continue to review, evaluate, and refine its strategies, supports, and other resources to improve student outcomes in ELA and surpass its 2022 scores.

Mathematics

Pivot has also shown a recent decline on a schoolwide basis in Mathematics. When compared to its scores on the 2023 Dashboard, Pivot experienced an increase in student academic achievement and performance in 2024 to the "orange" category, before dropping back to the "red" category in 2025. However, many student groups experienced increases between the 2024 and 2025 administrations of the Mathematics portion of the CAASPP, including the Hispanic, English Learners, Socioeconomically Disadvantaged, and Long-Term English Learners. Pivot, however, experienced significant declines among the White student group, dropping over 60 points between the 2024 and 2025 test administrations.

The following chart shows Pivot's performance on the 2022, 2023, 2024, and 2025 Dashboards in Mathematics both schoolwide and among its significant student group populations utilizing the "DFS" metric.

Student Group	2022 DFS Math	2023 DFS Math	2024 DFS Math	2025 DFS Math
All Students	-124 (Very Low)	-165.8	-141.7	-158.8

Hispanic	-158.1 (Very Low)	-171.1	-182.1	-173.5
White	-102.6 (Very Low)	-158.2	-103.1	-165.8
Two+ Races	N/A	-184.9	N/A	-126
English Learners	N/A	-211.5	-250.3	-214.3
Socioeconomically Disadvantaged	-144 (Very Low)	-184.9	-164.5	-162.6
Students with Disabilities	-161.1	-201.6	-185.6	-186.3
Long-Term English Learners	N/A	N/A	-241.5	-223.5

As reflected above, student performance declined among students schoolwide between the 2024 and 2025 ELA administrations of the CAASPP, and significantly declined among the White student group, which is problematic. However, Pivot experienced small gains among the Socioeconomically Disadvantaged, Hispanic, English Learner, and Long-Term English Learner groups, which is promising. Additionally, while Pivot showed a decline in its Student with Disabilities group, it was only slight.

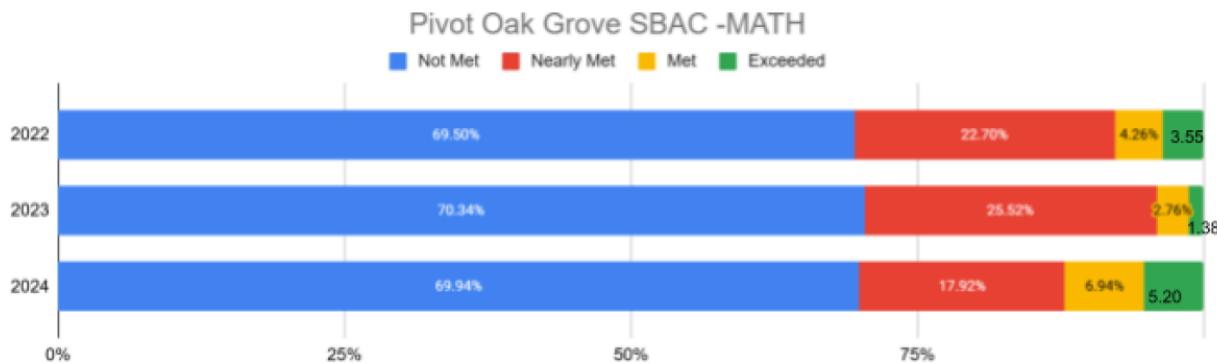
The following chart, also included for references purposes above, provides an additional snapshot of Pivot's Math performance over the 2023-24 school year compared to other DASS schools in Sonoma County. Pivot experienced a +24.1 point improvement on the Math portion of the CAASPP, outperforming many other County DASS schools.

School	ELA 2023-24 (Points below standard)	Change in Points	MATH 2023-24 (Points below standard)	Change in Points
Buena Vista High	130.9	+51	251.2	+0.8
Carpe Diem High (Continuation)	69.4	-83.2	164.4	-58.9
Creekside High	206.5	+45	241.9	+27.9
El Camino High	No data			
Johanna Echols-Hansen High (Continuation)	No data			
Laguna High	240.5	-79.1	273.2	-19.7
Marce Becerra Academy	223.2	-29.4	300.3	-65.2
Pivot Oak Grove	64.8	+7.9	141.7	+24.1
Ridgway High (Continuation)	201	-12.5	287.3	-29
Rincon Valley Partnership	155.2	-102.5	195.8	-99.7
San Antonio High (Continuation)	87.7	+28.1	243.2	-31.4
Santa Rosa City Schools	45.8	+8	89.1	+13.5
Sonoma County Alternative Education Programs	196.3	+28.9	222.2	+85.5
Sonoma County Court	No data			
Sonoma County Special Education	264.8	-9.3	288.5	-2.6
Sonoma Mountain High (Continuation)	No data			
West Sonoma County Consortium	21.1 above	+29.9	66.3	-41.1
Windsor Oaks Academy	215.9		239.1	

When comparing Pivot's performance against the state averages on the 2025 Math portion of the CAASPP, Pivot scored significantly below the state average in every student group. Again, the District recognizes that this does not account for Pivot's alternative school status.

Student Group	2025 DFS Math (State)	2025 DFS Math (Pivot)
All Students	-42.4	-158.8
Hispanic	-73.6	-173.5
White	-6.2	-165.8
Two+ Races	-.7	-126
English Learners	-86.1	-214.3
Socioeconomically Disadvantaged	-72.9	-162.6
Students with Disabilities	-120.7	-186.3
Long-Term English Learners	-158.9	-223.5

Additionally, as shown in the graph below, Pivot showed an increase in students who met or exceeded standards on the Math portion of the CAASPP from 2023 to 2024, rising from 4.14% to 12.14%. As addressed above, although this increase is commendable, it still represents a small percentage of students meeting or exceeding standards. However, the District acknowledges that this is attributable, in part, to the low percentage of students who participated in state testing, considering that the majority of Pivot's students are in high school and the Math portion of the CAASPP is only administered in grades 3-8 and 11.



While District staff, again, recognizes Pivot's high transiency and turnover rate among Pivot's student population from year to year as a contributing factor, performance in Math remains an area of concern and needed improvement. As with its ELA performance, the District expects Pivot to devote the necessary attention, resources, and time to develop focused strategies and interventions that are specifically designed to improve student outcomes in Math if its Renewal Petition is approved.

English Learner Progress Indicator.

Pivot received a “red” performance color designation for the English Learner Progress indicator, with 32.6% of English Learners making progress. This reflects a decline of 2.5% from the previous school year, and its score of 13.6% is below the state average. Pivot's English Learner population increased from 9.5% in 2024 to 13% in 2025. Given the relatively small student group, District staff recognizes that student performance can result in more significant fluctuations on this indicator. Nevertheless, the District expects that Pivot will implement a robust English Language Development curriculum and instructional practices and strategies that will promote meaningful progress toward English language proficiency and improved outcomes among this student group.

The Renewal Petition identifies various measures that Pivot has initiated, including parent support sessions, an increase in the number of Spanish-speaking staff, and the creation of new English Learner workshops to support students, among others. If its Renewal Petition is approved, Pivot must continue to develop resources and implement targeted interventions to support this critical student population.

Science.

The Science Indicator was introduced as part of the Dashboard in 2024, which draws data from student performance on either the California Science Test (“CAST”) or the California Alternate Assessment for Science. These assessments are administered annually to students in grades 5 and 8, as well as once during high school. The Science Indicator is currently only identified on the Dashboard for informational purposes, but Pivot received a “yellow” performance designation, with a score of 42.7 points. Pivot was outperformed by the state by about 10 points, but increased its performance by 5 points from the previous year, which is promising.

Chronic Absenteeism.

Pivot was designated in the “red” category for chronic absenteeism with 42.7% of students reported as chronically absent. Pivot maintained its score from the prior year (.4%), but was outperformed by the state by around 30%. The District remains concerned with Pivot’s high chronic absenteeism rate, while also taking into account that it serves at-promise students, many of whom are at risk of dropping out or have previously dropped out and returned to school. The District encourages Pivot to continue to make focused efforts to reengage and motivate students to boost attendance through one-on-one support, counseling, flexible learning options, and other resources.

Suspension Rate.

Pivot was assigned a “blue” designation due to a suspension rate of .9%. This extremely low suspension rate outperformed the state by 2%, and is commendable.

Graduation Rate.

On the 2025 Dashboard, Pivot was designated in the “red” category for its graduation rate, with 54.5% of students who graduated. This figure indicates that Pivot maintained its status at -.3%, but its graduation rate still remains well below the state’s average of 87.8%.

Pivot has shared that, each year, it serves students in 10th, 11th, and 12th grade who have earned no credits toward graduation. In addition, Pivot enrolls students in their fifth year of high school. As a DASS school, Pivot is eligible for the alternative one-year graduation rate indicator, which is reflected on the Dashboard. The 2024 DASS one-year graduation rate for Pivot was 62.2%--which Pivot expressed was nearly 8% higher than its five-year graduation rate.

The following chart provides an additional snapshot of Pivot's graduation rate over the 2023-24 school year, compared with other DASS schools in Sonoma County. Pivot experienced a +8.70 % improvement, where more than half of DASS schools experienced a decline in their year-over-year performance outcome for this indicator.

School	Career Readiness	Change	Graduation Rate	Change
Buena Vista High	5.90%	0%	68.60%	-11.9%
Carpe Diem High (Continuation)	7.70%	0%	92.30%	-7.70%
Creekside High	0%	0%	79.10%	+4.10%
El Camino High	10.80%	+7.50%	70.80%	-11.20%
Johanna Echols-Hansen High (Continuation)	0%	0.00%	56.30%	-43.80%
Laguna High	0%	-2.40%	86.70%	+8.10%
Marce Becerra Academy	0%	-4.50%	88.90%	-2.00%
Pivot Oak Grove	11.10%	+3.50%	54.80%	+8.70%
Ridgway High (Continuation)	0.90%	+0.30%	90.50%	+7.80%
Rincon Valley Partnership	Serves P-6		Serves P-6	
San Antonio High (Continuation)	0%	0%	43.30%	-7.80%
Santa Rosa City Schools	29.50%	+2.20%	86.50%	+3.80%
Sonoma County Alternative Education Programs	0%	0%	22.7 %	-23.90%
Sonoma County Court	0%	0%	50%	-3.80%
Sonoma County Special Education	No data		No data	
Sonoma Mountain High (Continuation)	No data		No data	
West Sonoma County Consortium	Serves P-8		Serves P-8	
Windsor Oaks Academy	0%	0%	60.90%	-16.40%

Pivot's Renewal Petition presents a new "Graduation Track Program" designed to boost the graduation rate for its at-promise students. According to the Renewal Petition, this initiative is focused on providing "fast-track prescriptive courses, intensified individual support, community-building activities, credit recovery and acceleration programs, and personalized student monitoring to eliminate barriers to graduation. By providing connections to job mentors, counseling, county programs, and real-world experiences, along with alternative curricula, in-person classes, and summer school opportunities, the program reinforces [Pivot's] commitment to fostering academic success and empowering every student to earn their diploma, building on [Pivot's] proven progress in improving graduation rates."

If Pivot's Renewal Petition is approved, this will be an area of focused monitoring to ensure that the program is being implemented with fidelity and in a manner that shows demonstrated progress on this graduation rate metric for students enrolled in the charter school.

College/Career Indicator.

Pivot was assigned a performance color of "orange" on the College and Career Indicator for the 2025 Dashboard, with 12.8% of its students considered prepared. Pivot's performance on this metric is an area of concern for the District, as it is almost 40 points below the state average of 51.7%. The District recognizes, however, that Pivot's career readiness rate increased by 3.5% during the 2023-24 school year, which surpassed most DASS schools. Pivot also maintained this rate at 12.8% on the 2025 Dashboard.

Poor performance on this indicator demonstrates that its high school students are not prepared for post-secondary college and career life. If granted renewal, the District recommends that the Pivot develop a focused and measurable action plan to improve upon this metric.

Local Indicators

According to the 2023, 2024, and 2025 Dashboard results, Pivot has met all standards on the local indicators, including teachers, instructional materials and facilities; implementation of academic standards; parent and family engagement; local climate survey; and access to a broad course of study.

District staff understands that approximately 65.2% of Pivot's students are socioeconomically-disadvantaged, 13% are English Learners, and 26.3% are Students with Disabilities, and it acknowledges the challenges presented by serving at-promise students. However, the District remains concerned with Pivot's very low academic performance and recent declines during the 2024-25 school year based on the recently-published Dashboard results.

Overall, based on the above data and other related information, the District has determined that while Pivot's academic performance has declined schoolwide and among most student groups based on the state and local indicators, it has performed comparably and/or better than other DASS-qualifying schools serving a similar student population within the geographic region. Thus, in light of Pivot's alternative school status and comparative performance, District staff finds that Pivot is eligible for a five-year renewal of its charter. Nevertheless, given the declines on key academic indicators, Pivot must engage in ongoing efforts to boost student academic performance and achievement in these areas.

Finding of Fact No. 2: Pivot has demonstrated improved student outcomes based on the alternative metrics implemented during the most recent charter term.

Because Pivot is a DASS-qualifying school that represents at-promise students who often lack foundational grade level skills needed to be successful, formal assessments alone do not always accurately indicate student growth or potential. Thus, Pivot utilizes alternative metrics to measure the academic growth of underserved students.

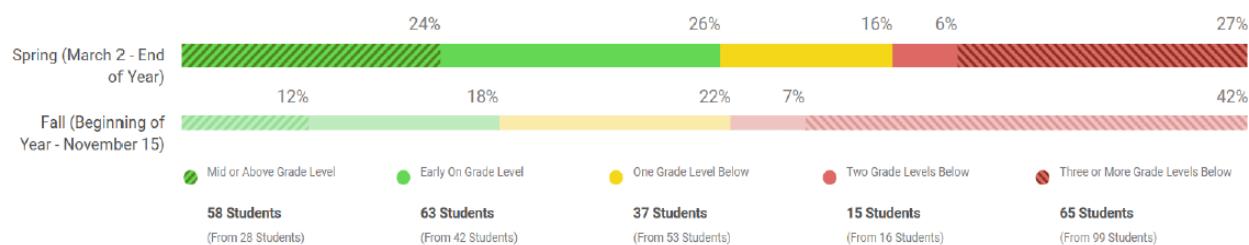
As discussed below and throughout this report, Pivot is held to alternative measurements for accountability. Specifically, Pivot uses iReady assessments in Reading and Mathematics to gather critical information on student readiness to drive programmatic decisions and track student achievement. Students take diagnostic tests in both reading and math up to three times per year, which results allow Pivot to work closely with families and students to place the students in the appropriate courses and programs to increase their academic success.

iReady Reading Assessment Data

The following bar graphs provide a snapshot of improvements and trends among all students, as well as major student groups in Reading for Pivot's most recent term, based on the iReady assessment.

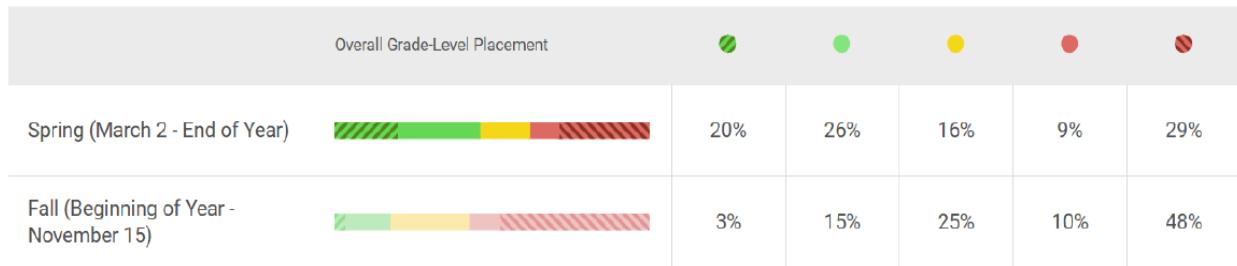
Specifically, the graph below indicates that for all students in the 2024-25 school year, 30% of Pivot students were identified as at or above grade level in Reading for the fall, which grew to 50% of students at or above grade level in Reading during the spring.

2024-2025 i-Ready Reading Growth



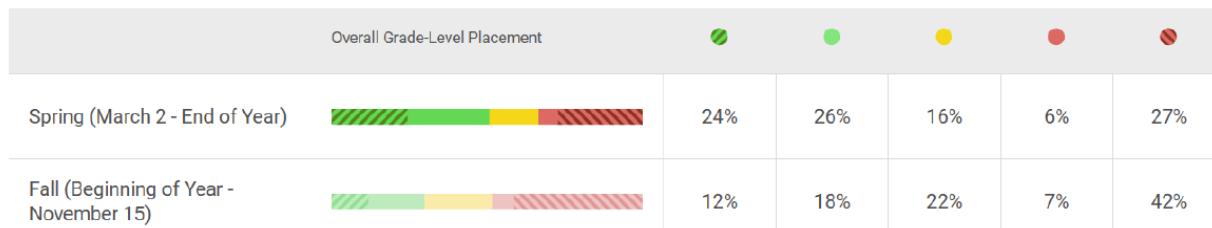
Additionally, the graph below indicates that 18% of Hispanic/Latino students were at or above grade level in Reading following the Fall 2024-25 iReady assessments, which grew to 46% at or above grade level after the Spring 2024-25 iReady assessments.

2024-25 i-Ready Reading Growth (Hispanic or Latino)



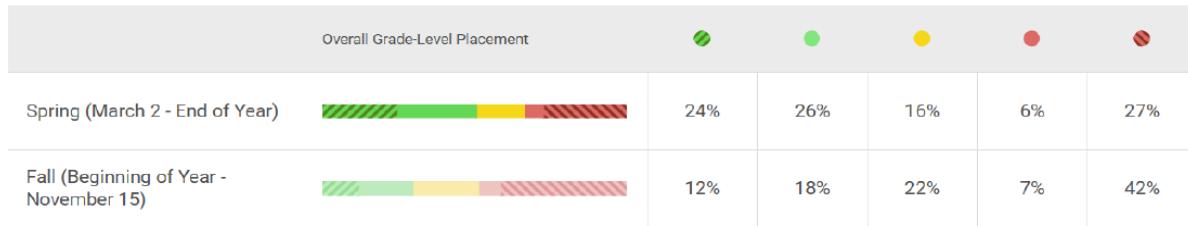
Similarly, the graph below demonstrates that 30% of students in the Students with Disabilities group were at or above grade level in Reading following the Fall 2024-25 iReady assessments, which grew to 50% at or above grade level after the Spring 2024-25 iReady assessments.

2024-25 i-Ready Reading Growth (Students with Disabilities)



Further, the graph below indicates that 30% of students in the Economically Disadvantaged group were at or above grade level in Reading following the Fall 2024-25 iReady assessments, which grew to 50% at or above grade level after the Spring 2024-25 iReady assessments.

2024-25 i-Ready Reading Growth (Economically Disadvantaged)

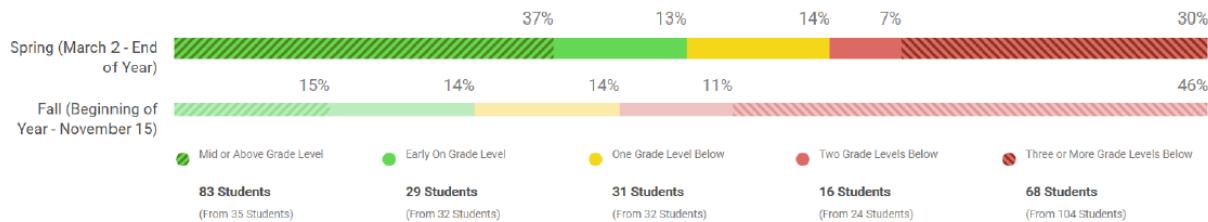


iReady Math Assessment Data

The following bar graphs provide an additional snapshot of improvements and trends among all students, as well as major student groups in Math for the 2024-25 school year, based on the iReady assessment.

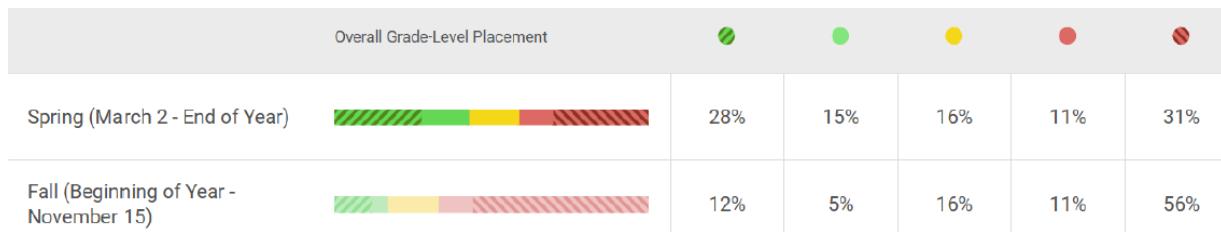
Specifically, the graph below indicates that for all students in the 2024-25 school year, 29% of Pivot students were identified as at or above grade level in Math for the fall, which grew to 50% of students at or above grade level in Math during the spring.

2024-2025 i-Ready Math Growth



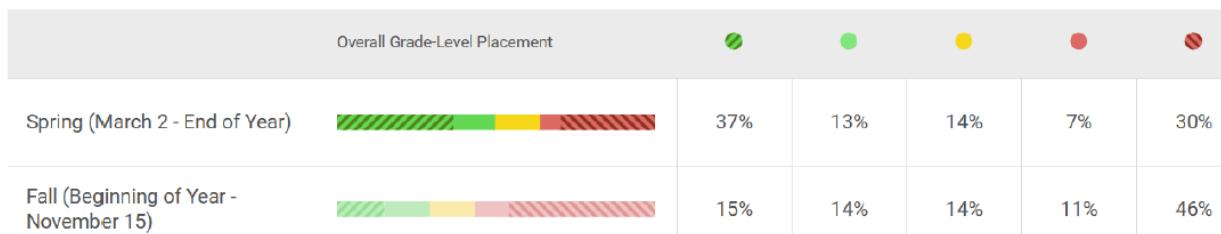
Additionally, the graph below indicates that only 17% of Hispanic/Latino students were at or above grade level in Math following the Fall 2024-25 iReady assessments, which grew significantly to 43% at or above grade level after the Spring 2024-25 iReady assessments.

2024-2025 i-Ready Math Growth (Hispanic or Latino)



Similarly, the graph below demonstrates that 29% of students in the Students with Disabilities group were at or above grade level in Math following the Fall 2024-25 iReady assessments, which grew to 50% at or above grade level after the Spring 2024-25 iReady assessments.

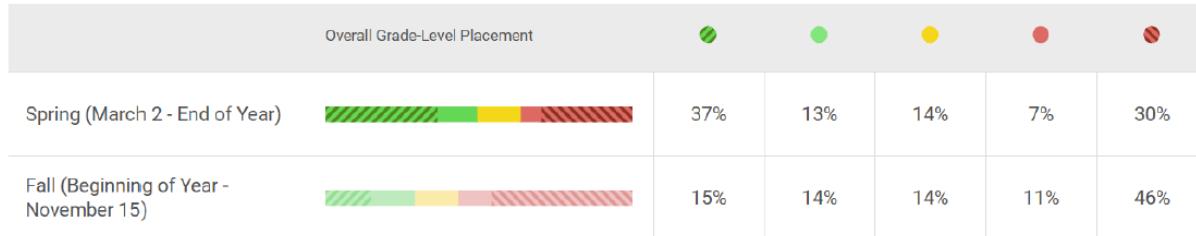
2024-25 i-Ready Math Growth (Students with Disabilities)



Finally, the graph below indicates that 29% of students in the Economically Disadvantaged group were at or above grade level in Reading following the Fall

2024-25 iReady assessments, which grew to 50% at or above grade level after the Spring 2024-25 iReady assessments.

2024-25 i-Ready Math Growth (Economically Disadvantaged)



Performance on these alternative metrics appears to reflect noteworthy progress among these student groups in both Reading and Math.

Credit Recovery and Completion

The District also recognizes that credit recovery and completion was utilized as an alternative metric by the charter school. With respect to credit recovery, Pivot reported that of the students enrolled for the full 2024-25 school year, 66.7% earned more credits per semester than at their previous school. Pivot also indicates that it has experienced an increase of 10% in credit completion since qualifying as a DASS school, which it attributes to individualized scheduling and graduation plans, more course options, and use of iReady data for course placement.

2. Charter Petition Renewal Criteria Under Education Code Section 47605/Findings of Fact

Education Code section 47607 provides that charter renewals are governed by the standards and criteria set forth in Education Code section 47605 and must include, but not be limited to, a reasonable comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed.

a. Grounds for Denial

The governing board of a school district shall not deny a petition unless it makes written factual findings specific to the particular petition, setting forth specific facts to support one or more of the following findings:

1. The charter school presents an unsound educational program for the students to be enrolled in the charter school.
2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.

3. The petition does not contain the number of signatures required by subdivision (a) of Education Code section 47605. (*The signature requirement is not applicable to a renewal petition.*)
4. The petition does not contain an affirmation of each of the required conditions.
5. The petition does not contain reasonably comprehensive descriptions of all required elements.
6. The petition does not contain a declaration of whether or not the charter school shall be deemed the exclusive public school employer of the employees of the charter school for purposes of the Educational Employment Relations Act.
7. The charter school is demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate. (*This finding is not applicable to a renewal petition.*)
8. The school district is not positioned to absorb the fiscal impact of the proposed charter school. (*This finding is not applicable to a renewal petition.*)

The following provides an executive summary of the District's evaluation of the 15 required elements described in the Renewal Petition.

Executive Summary

Element No. / Category	Element / Category	Does the Petition include a reasonably comprehensive description of the element?
1	Description of Educational Program	Yes, except as noted.
2	Measurable Student Outcomes	Yes, except as noted.
3	Methods for Measuring Student Progress	Yes.
4	Governance Structure	Yes.
5	Employee Qualifications	Yes.
6	Health and Safety Procedures	Yes.
7	Balance of Students from Different Student Groups	Yes.
8	Admissions & Lottery Procedures	Yes.

9	Annual Independent Financial Audits	Yes.
10	Student Discipline Procedures	Yes.
11	Retirement Systems	Yes.
12	Public School Attendance Alternatives	Yes.
13	Post-Employment Rights of Employees	Yes.
14	Dispute Resolution Procedures	Yes.
15	Closure Procedures	Yes.

b. Findings of Fact

The District conducted a comprehensive review of Pivot's Renewal Petition, which included a detailed analysis of its educational program, measurable student outcomes and methods for measuring student progress, fiscal and governance structures, student admissions and discipline, labor and personnel issues, facilities and operations, and legal issues. Overall, as detailed below, the Renewal Petition included reasonably comprehensive descriptions of the required legal elements. District staff identified some items of concern, however, specifically regarding Pivot's special education program. If Pivot's charter is renewed for an additional term, these items will need to be addressed as part of the ongoing annual charter oversight process, an updated memorandum of understanding ("MOU") negotiated by the parties and approved by their respective governing boards, and/or as conditions that the District's Board may direct Pivot to satisfy within a specified time period.

Below, District staff presents its findings of fact addressing the general categories of review.

Finding of Fact No. 3: The Renewal Petition generally presents a sound educational program for the students enrolled in the charter school.

Pivot's Renewal Petition, as written, generally reflects a program that is consistent with sound educational practice.

Pivot's Renewal Petition includes a comprehensive description of the educational program and offerings for the students enrolled in its charter school. Pivot offers a nonclassroom-based charter school program where students utilize an independent study model that emphasizes personalization and teacher support. Pivot's focus is on cultivating a small, hands-on learning community that does not compete with traditional schools, but rather, offers a meaningful alternative.

Pivot employs a variety of instructional strategies to create an effective learning environment, including a robust virtual program as well as a blended/hybrid learning program with a variety of opportunities offered on-site at Pivot's resource center. Approximately 40% of Pivot students utilize its resource center for tutoring, meeting with teachers, and/or to attend the structured programs offered each week. Additionally, Pivot's blended/hybrid model offers daily learning labs where students can get help with their online coursework and attend live classes. Pivot also offers excursions and events organized at least twice a month to foster a school community and to provide time for students to socialize and connect with one another. Students may access the resource center from one to five school days per week, or remain completely virtual—completing all on-line coursework at home. (See Renewal Petition, p. 57).

The Renewal Petition details the manner in which Pivot addresses the needs of its students who are academically low achieving. Pivot employs small group instruction, tutoring, subject-specific support courses and tutorials, and iReady instructional plans.

District staff notes that the Renewal Petition's description of how Pivot will identify, address, and meet the needs of its students with disabilities is lacking important details and is not fully developed. This is particularly concerning given that students with disabilities comprise approximately 26.3% of Pivot's student population. Further detail on this category of review is included below.

Overall, the instructional program, if implemented with fidelity and in alignment with the Renewal Petition, appears to be consistent with sound education practice and designed in a manner to address the needs of Pivot's identified student groups. The District emphasizes, however, the importance providing its at-promise students with a high quality, rigorous instructional program and other critical resources specifically tailored to reengage and motivate them in their learning and to help pave a pathway toward graduation and post-secondary success.

Finding of Fact No. 4: The Petitioners are demonstrably likely to successfully implement the program, but the District notes it concerns below.

Pivot has been operating as a charter school under the authorization of Oak Grove Union Elementary School District since 2010. Pivot's governance and leadership teams appear to have background and experience in key areas needed for successful charter school operations.

The District conducted a review of various financial documents provided with the Renewal Petition, including its multi-year projections, cash flow documentation, and budget assumptions addressing enrollment, average daily attendance ("ADA"), unduplicated counts, revenues, and expenditures. The following includes the District's analysis of those documents.

Attendance and Enrollment

The most significant portion of a charter school's funding is based on ADA. The Renewal Petition assumes steady enrollment of 490 students for each of the five years of the proposed renewal term. (See Renewal Petition, p. 59.) However, there is no clear explanation as to how this enrollment figure was derived, especially when considering historical enrollment trends for the charter school and its significant attrition rate. According to information gleaned from the California Department of Education's DataQuest system, Pivot's average enrollment over the last seven (7) years was 414 students—with the highest enrollment reaching 468 students in the 2019-2020 school year. Given that Pivot's projections for the renewal term are 22 students greater than its highest enrollment over a seven-year span, these figures do not appear to be grounded upon reasonable assumptions. An overstatement of revenue could compromise Pivot's fiscal position if its anticipated enrollment is not realized. This concern is further compounded by Pivot's high chronic absenteeism rate, which directly impacts funding. The District expects Pivot to reevaluate its revenue assumptions to ensure accuracy and avoid overstating revenues based on enrollment and attendance projections.

Reserve for Economic Uncertainties

A reserve for economic uncertainties ("REU") is the Unrestricted Ending Fund Balance divided by total expenditures. Public education industry standards recommend that an LEA of similar enrollment size maintain an REU equal to 3% of expenditures. Pivot has projected that it will maintain an REU well above 3%, with a fund balance in excess of 50%. There is no clear explanation supporting why Pivot maintains such a high fund balance, and it causes the District to question whether it is dedicating sufficient funds to support a robust and effective instructional program for the students enrolled in the charter school. If the Renewal Petition is approved, District staff will need a detailed explanation addressing the high fund balance.

Budget / MYP / Cash Flow

In reviewing Pivot's MYP, the District observed that the projected expenditures appear sufficient for employee salaries and benefits, instructional materials, equipment and supplies, facilities and utilities costs, technology, professional development and training, legal services, other outside contractors (e.g., back office), insurance, special education, oversight fees, and meal service. However, some of the budget items by object code are flat across the projection years with no explanation, including utilities (5510), janitorial and gardening (5515), waste (5525), water (5530), communications (5910), etc. In addition, business services (5812) is flat from fiscal year 2027 through 2030, but then it increases by 34%. Further, the budget item for special education contract instructors decreases by 27% from fiscal year 2027 to 2028 without explanation. The District seeks clarification regarding these inconsistencies from Pivot.

Based on a review of the cash flow documentation, Pivot's monthly projection of revenue receipt aligns with local, state, and federal disbursements. In addition, Pivot's expenditures are projected by month and correspond with reasonable schedules. Finally, Pivot projects that it will maintain a positive cash balance each month.

Other than the identified concerns described above, it appears that Pivot's program, fiscal condition and practices, and operations demonstrate that it is likely to be successful.

Finding of Fact No. 5: The Renewal Petition contains all of the affirmations of the required conditions.

The Renewal Petition includes all required affirmations and assurances.

Finding of Fact No. 6: The Renewal Petition provides reasonably comprehensive descriptions of the required elements set forth in Education Code section 47605.

Based on an analysis of the Renewal Petition by the District's review team, the Renewal Petition generally provides reasonably comprehensive descriptions of the required elements set forth in Education Code section 47605 to support eligibility for the renewal of Pivot's charter. However, the review team has identified a few issues/concerns with certain elements described in the Renewal Petition, as detailed below. These issues can be addressed as part of the ongoing annual charter oversight process, in an MOU negotiated between the parties, or as specified conditions for the charter school to satisfy within a designated time period if the Renewal Petition is approved by the District's Board.

1. Special Education Program Description. Element 1 of the Renewal Petition is lacking detail in its description of the manner in which Pivot addresses the unique needs of students with disabilities. Specifically, while the Renewal Petition states that Pivot is a member of the El Dorado County Charter SELPA, it lacks documentation and references to specific SELPA policies and procedures. The Renewal Petition also does not include a reasonably comprehensive description of the continuum of placement options available to students with disabilities who cannot receive a free appropriate public education ("FAPE") in a nonclassroom-based setting.

Additionally, the Renewal Petition suggests that students within a 45-mile radius of the school's resource center receive services in person, while those living further away receive services virtually. However, use of this 45-mile distinction is improper. Whether a student participates virtually or in-person to receive special education services must be based on the student's unique educational needs and if such services can be appropriately accessed by the student. Further, this is a decision that must be determined by the student's individualized education program ("IEP") team and should not be treated as a standard policy or practice

implemented by the charter school. Virtual services may not be appropriate for some students, regardless of the proximity of their residence to the charter school's resource center.

Transportation is also a related service to be determined by an IEP team if it is required for the student to receive FAPE. The Renewal Petition states that students with "significant emotional challenges" living further than 45 miles away from the site would receive services virtually, which contradicts Pivot's assertion that such students would come in-person to the resource center.

The District would like to see additional detail regarding the following processes and procedures of Pivot's special education program: interim placement procedures; procedures for addressing out-of-compliance IEPs; specific policies for responding to parental concerns or complaints related to special education services; IEP meeting procedures and implementation processes; a description of how the school implements special education services, including placement and services for students with more significant needs; and the relevant assessment processes and procedures (including an affirmation that a parent or legal guardian can request an assessment).

The Renewal Petition also fails to specifically describe Pivot's service delivery model, and includes conflicting statements on how students are grouped. For example, the Renewal Petition states that groups are based on both primary disability and specific learning disability. However, any decisions concerning a student's placement, services, and supports should be based on the student's special education eligibility and unique educational needs—not general groupings of students with disabilities.

Additionally, the Petition does not include an adequate description of the appropriate procedures for child find activities. The Renewal Petition states that a student shall only be referred after general education resources have been considered, even though special education referrals and requests for assessment may come directly from teachers and parents without first exhausting general education interventions or supports. Pivot has a legal obligation to address and respond to referrals and requests for assessment accordingly under both federal and state law.

Moreover, the Renewal Petition does not include a reasonably comprehensive description of the essential components of a legally-compliant special education program under the Individuals with Disabilities Education Improvement Act of 2004 and related state law. Specifically, the Renewal Petition lacks a meaningful description of assessment procedures, the continuum of placement options to serve students in the least restrictive environment, the range of available services and supports, and parent engagement/participation in the development

of the student's program. Oddly, the Renewal Petition also states that it complies with "reasonable SELPA directives." However, as a local educational agency member of the SELPA, the District would expect Pivot to ensure compliance with all SELPA directives, without using this qualifier of "reasonable."

Given these omissions, District staff seeks additional data regarding the number of students within the various eligibility categories, as well as IEP timeline compliance data for the previous charter term. Further, the District requests additional clarity on Pivot's special education staffing. Specifically, Pivot states that it has three Education Specialists serving students at the resource center, but this does not indicate how students are served remotely (or whether these same Education Specialists provide virtual service delivery). While the Renewal Petition references services provided by outside vendors, it lacks detail on the types of services provided, as well as the processes and procedures for sharing student information with vendors.

2. **Measurable Student Outcomes.** The Renewal Petition does not include sufficient detail regarding Pivot's measurable student outcomes for students on both a schoolwide basis and for all significant student groups. Rather than integrate a detailed summary in the Renewal Petition of the charter school's annual goals, actions to achieve those goals, and measurable student outcomes, Pivot simply refers to its local control and accountability plan ("LCAP") for further information. District staff expected to see a thoughtful presentation and analysis of those measurable student outcomes in the Renewal Petition.
3. **Independent Study Requirements.** The Renewal Petition generally includes a reasonably comprehensive description of Pivot's understanding and application of the independent study requirements set forth in the Education Code. However, as a nonclassroom-based program that implements an independent study model, the Renewal Petition should have provided a more robust explanation of the policies, procedures, and practices that Pivot implements as part of this instructional model, in addition to a copy of Pivot's master independent study agreement.

Finding of Fact No. 7: The Renewal Petition includes a declaration of whether or not the charter school shall be deemed the exclusive public school employer of the employees of the charter school.

The Renewal Petition confirms that Roads Education Organization, the nonprofit public benefit corporation operating Pivot, shall serve as the exclusive public school employer of the employees of Pivot for purposes of the Educational Employment Relations Act.

Finding of Fact No. 8: The Renewal Petition satisfies other key areas related to the operations, facilities, and other potential effects of the charter school.

Overall, the Renewal Petition satisfies other key areas related to the operations, facilities, and other potential effects of Pivot. The District recognizes that Pivot utilizes a nonclassroom-based independent study instructional model and serves students at 2999 Cleveland Avenue, Suite D, Santa Rosa, California 95403.

Notably, the Renewal Petition states that Pivot utilizes multiple adjacent suites that add office space and classrooms for students. The District cautions Pivot against expanding its operations to one or more sites, which requires the submission of a material revision request and the approval of the charter authorizer prior to implementation pursuant to Education Code section 47605(a)(4).

Further, the District understands that Pivot contracts out for certain back office functions (including business and financial services) with EdTec. If the Renewal Petition is approved, District staff recommends that the parties negotiate and enter into an MOU that addresses the operational, fiscal, legal and other aspects of the charter school, and ensures that the District will have the right to inspect and/or access records concerning Pivot that are maintained by EdTec or any other back-office provider. In addition, the District expects that Pivot will ensure full cooperation by EdTec with any reasonable requests for information or records, pursuant to the District's oversight authority, related to the financial and other matters it administers, performs, or coordinates on behalf of the charter school.

District Staff Recommendation

Based on the District review team's analysis of the above-described criteria for renewal and the corresponding Findings of Fact Nos. 1-8, District staff has determined that Pivot qualifies for renewal for a five-year term beginning on July 1, 2026, and ending on June 30, 2031. The District, however, encourages Pivot to thoughtfully consider and address the concerns and items identified herein that are need of correction, clarification, or further detail. If the Renewal Petition is approved, these items will be the subject of focused monitoring by the District as part of its oversight role, as well as the development and negotiation of an MOU between the parties. The Board may also consider imposing conditions upon Pivot that must be met within a certain timeframe if its charter is approved.