# ATTACHMENT “A”

## BUCKEYE UNION SCHOOL DISTRICT
*Staff Report Regarding*

## Renewal of The Cottonwood School

**Presented:**
**Governing Board Meeting**
**January 21, 2026**

# Table of Contents


School Overview ..... 4
Staff Recommendation ..... 4
I. Criteria for Evaluation and Procedural Background ..... 5
Criteria for Renewal ..... 5
Renewal Tier Analysis ..... 5
Figure 1: The Cottonwood School Tier Analysis ..... 5
Figure 2: Renewal Tier Additional Guidance ..... 6
Procedure ..... 6
II. Renewal Criteria I – Has the Charter School Presented a Sound Educational Program? ..... 7
A. School Performance Analysis ..... 7
Figure 3: School Performance Analysis Summary – 2023, 2024, 2025 ..... 7
B. Schoolwide Academic Performance ..... 9
C. Key Student Group Academic Performance ..... 14
Figure 4: Comparison of Academic Performance Analysis ..... 14
D. TCS' Dashboard Local Indicators 2024 & 2025 ..... 15
E. English Learner Progress ..... 15
Figure 5: 2022-23 Summative ELPAC Results Comparison ..... 16
Figure 6: 2023-24 Summative ELPAC Results Comparison ..... 16
Figure 6.1: 2024-2025 Summative ELPAC Results Comparison ..... 17
Figure 7: 2020-2021 through 2024-2025 English Learner Acquisition Status ..... 17
F. Verified Data ..... 17
Internal Assessment Data Analysis – Renaissance Star ..... 19
III. Renewal Criteria II – Is the Charter School Demonstrably Likely to Successfully Implement the Proposed Program? ..... 19
A. Enrollment ..... 19
Figure 8: 2024-2025 Current Student Population by Grade Level ..... 20
Figure 9: 2019-20 through 2023-24 Enrollment ..... 21
Figure 10: 2020-2021 through 2024-2025 Enrollment ..... 21
Figure 11: Projected Enrollment through 2030-2031 ..... 22
B. Financial Condition ..... 22
Figure 12: Financial Analysis ..... 22
Figure 13: 2026-2027 – 2030-2031 MYP ..... 23
C. Enrollment Demographics ..... 24
Figure 14: 2024-2025 Enrollment Demographics ..... 24
English Learner Enrollment ..... 24
Figure 15: 2024-2025 English Learner Proficiency ..... 25
Figure 16: 2024-2025 English Learner Comparison ..... 26
Special Education Enrollment ..... 26
Figure 17: 2024-2025 Students with Disabilities ELA Comparison ..... 26
Figure 18: 2024-2025 Students with Disabilities Math Comparison ..... 27
D. Notices of Concern and/or Notices to Cure and Correct ..... 27
Figure 19: Notices of Concern and/or Notices to Cure and Correct ..... 28
E. Board Health and Effectiveness ..... 28
F. Staffing and Teacher Credentialing ..... 28
Figure 20: 2020-21 through 2022-2023 Educator Credentials Report ..... 29
IV. Renewal Criteria III: Is the Petition Reasonably Comprehensive? ..... 31
A. The Required Fifteen Elements ..... 31
Figure 21: Petition Element Analysis ..... 31
B. Other Required Information ..... 31
Figure 22: Other Required Information Analysis ..... 31

V. Renewal Criteria IV: Is the Charter School Serving All Students Who Wish to Attend ..... 32
A. State Provided Enrollment Data ..... 32
Figure 25: State Data Report ..... 33
B. Substantiated Complaints and Notices of Concern Related to Non-Compliance With Suspension/Expulsion Requirements ..... 33
VI. Recommendation Summary ..... 33

# *Renewal Petition Staff Report*

**The Cottonwood School**

*January 2026*

## *School Overview*

| The Cottonwood School (TCS) | | | |
|---|---|---|---|
| **Charter Management Organization (CMO):** | None | **Previous Renewal Year(s):** | August 2019 (Opened) |
| **Year Opened:** | 2019 | **Campus Address:** | 3921 Sandstone Drive, Ste. A<br>El Dorado Hills, CA 95762-9343 |
| **Neighborhood:** | El Dorado Hills | **Attendance Area(s):** | Folsom, El Dorado Hills, Cameron Park |
| **TCS Board:** | 5 | **Current Enrollment:** [1] | 3,585 |
| **Current Grades Served:** | TK-12th | **Current Maximum Authorized Enrollment:** | 3,100 (5/18/22 Material Revision) |
| **Current Authorized Grades:** | TK-12th | **5-Year Projected Enrollment** | 26-27 = 3,550<br>27-28 = 3,750<br>28-29 = 4,000<br>29-30 = 4,250; and<br>30-31 = 4,500 (Max.) |

## *Staff Recommendation*

Staff recommends **APPROVAL** of the renewal petition for The Cottonwood School ("TCS" or "Charter School") for 5 years, beginning July 1, 2026, until June 30, 2031 to serve up to a maximum of 4,500 students in grades TK-12th with a projected annual enrollment as outlined in the table above.

1 Per enrollment report submitted in October 2025

# I. Criteria for Evaluation and Procedural Background

### *Criteria for Renewal*

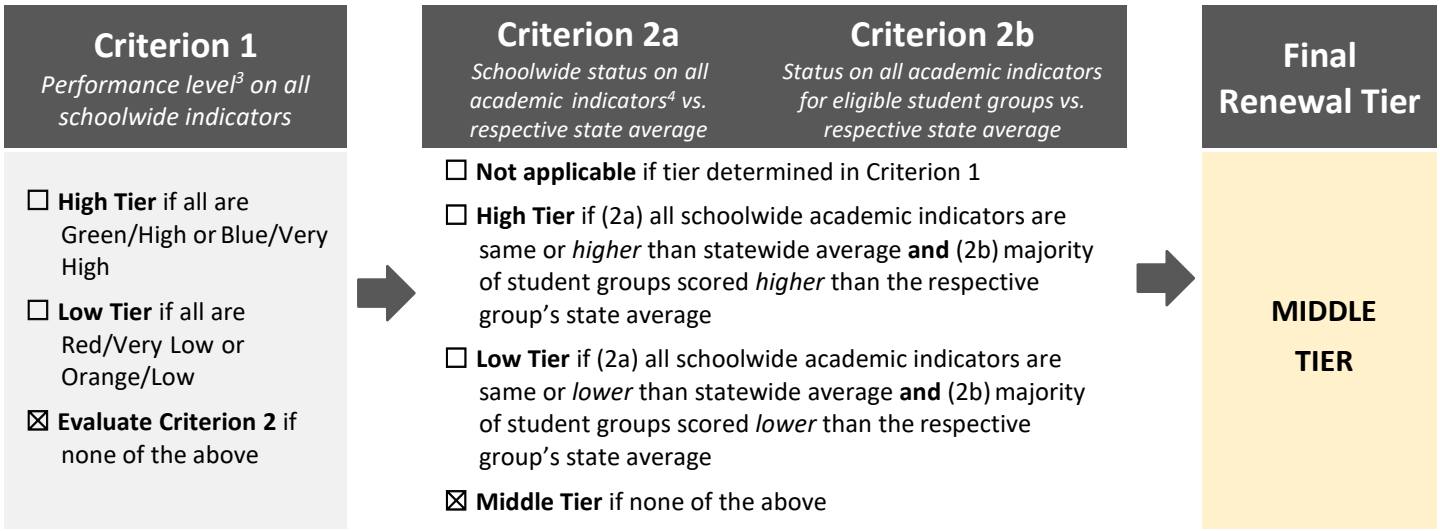
The Charter Schools Act of 1992 established the criteria by which charter renewal applications must be evaluated. In order to recommend the approval of a charter school renewal petition, District staff must determine that the charter school has met the requirements set forth in Education Code (Ed Code) Sections 47605, 47607, and 47607.2. Specifically, in order to be recommended for renewal, 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, the Education Code outlines a three-tiered system of performance categories for most 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 to determine the charter school's renewal tier[2].

**Figure 1:** The Cottonwoodi School Tier Analysis




***Sources**: California School Dashboard; CDE Charter School Performance Category Data File; CDE "Determining Charter School Performance Category" Flyer*

As indicated in Figure 1 above, the CDE placed[4] TCS in the Middle Tier. In addition, on October 15, 2024 CDE published a list of high -, middle-, and low performing charters schools, which identified TCS as a middle performing school and thus the renewal petition should be Middle Tier. As discussed previously, there are additional criteria and conditions for evaluating the Charter School's petition depending on the assigned tier. Figure 2 below outlines the renewal conditions and additional evaluation guidance applicable to schools placed in the Middle Tier.

[2]For the 2022 California School Dashboard, due to the COVID-19 pandemic, status "levels" were assigned to each indicator in place of colors. For the tier analysis, the State used these levels as a proxy for colors, as expressed in Criterion 1.

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

[4] Charter school performance categories for all California charter schools can be found here: https://www.cde.ca.gov/sp/ch/performcategory.asp

**Figure 2:** 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:<br>1. *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*<br>2. *The closure is in the best interest of the pupils; AND*<br>3. *The decision provided greater weight to performance on measurements of academic performance (if applicable).*<br><br>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:<br>A. *Substantial fiscal or governance concerns; or*<br>B. *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.*<br><br>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:<br>A. *The corrective action proposed by the charter school has not been successful; or*<br>B. *The violations are sufficiently severe and pervasive as to render a corrective action plan unviable.* |
| **Verified Data**[5] *(Optional)* | If the charter school chooses to submit, the authorizing entity shall also consider clear and convincing evidence, demonstrated by verified data, showing either:<br>A. *The school achieved measurable increases in academic achievement, as defined by at least one year's progress for each year in school; or*<br>B. *Strong postsecondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers.* |

***Source**: Education Code §47607.2(b)*

## *Procedure*

1. The Charter School submitted a renewal petition to the District on October 24, 2025
2. The initial public hearing was held on November 5, 2025.
3. Staff conducted a review of the Charter School's documents, policies, financials, academic performance, and renewal petition to assist in developing the staff report.
4. Staff findings were made public by the 15-day posting requirement, which was January 5, 2026.
5. The decision public hearing is being held on Wednesday, January 21, 2026.

[5] 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

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

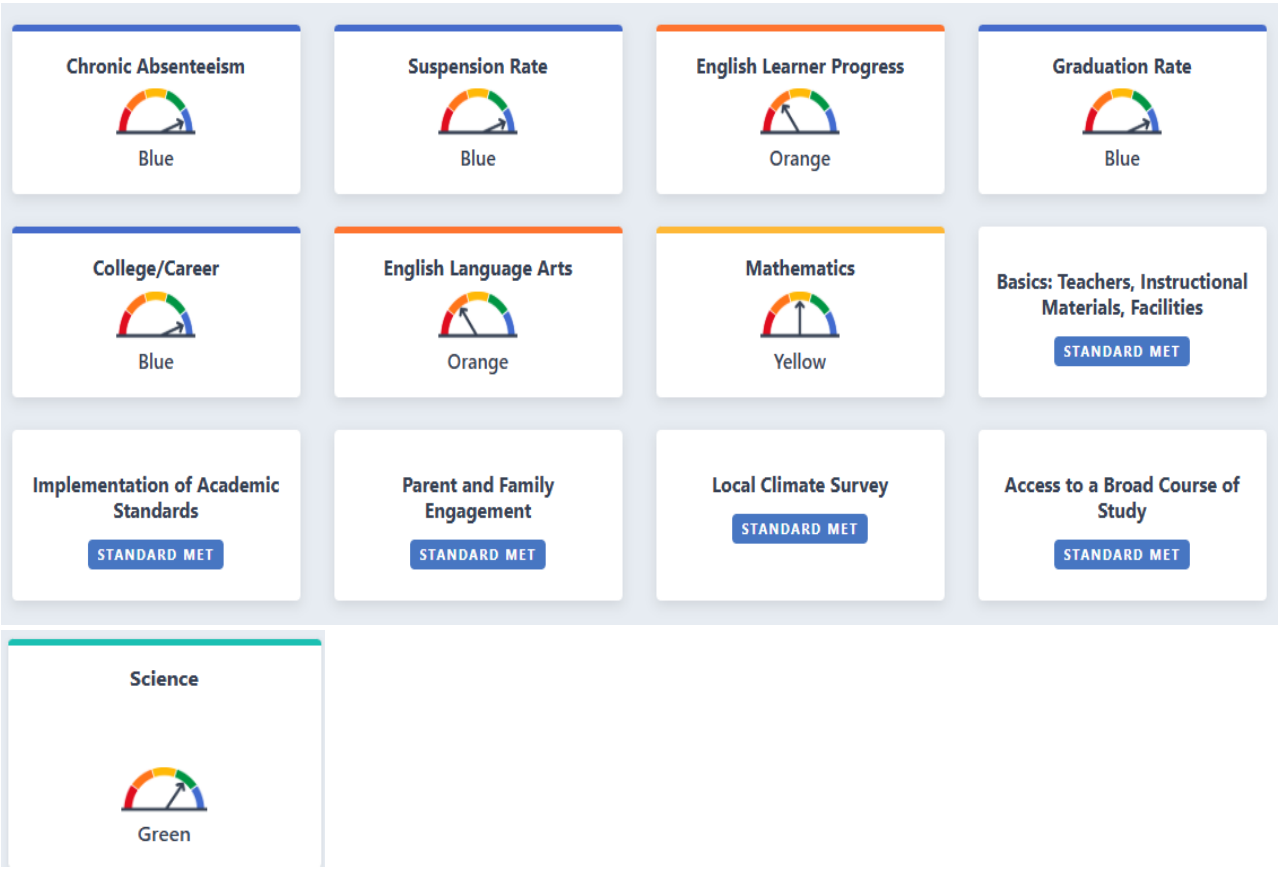
*In order for a charter school's renewal petition to be approved, it must present a sound educational program for its students. As mentioned previously, for schools in the Middle Tier, the District is required to consider the school's performance on California School Dashboard indicators, providing greater weight to performance on academic indicators. 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 CAASPP state assessments, ELPAC results and verified data submitted by the Charter School.*

## A. School Performance Analysis

The District performed an analysis to determine whether TCS meets the minimum performance threshold on a variety of indicators based on the California School Dashboard and other data, as applicable. In order to be considered "Met", an indicator must have a California School Dashboard Color Orange/Low Status Level or higher. Schools meeting more than 50% of indicators/categories for which data is available are generally considered to be meeting the minimum performance level for purposes of renewal. A summary of the SPA analyses for the 2022-23, 2023-24 and 2024-2025 school years is shown below. As shown in the tables below, TCS has met the minimum performance threshold for the 2022-23, 2023-24 and 2024-2025 school years.

**Figure 3:** School Performance Analysis Summary – 2023, 2024 and 2025

**2024-2025 – TCS Met All Local Indicators**

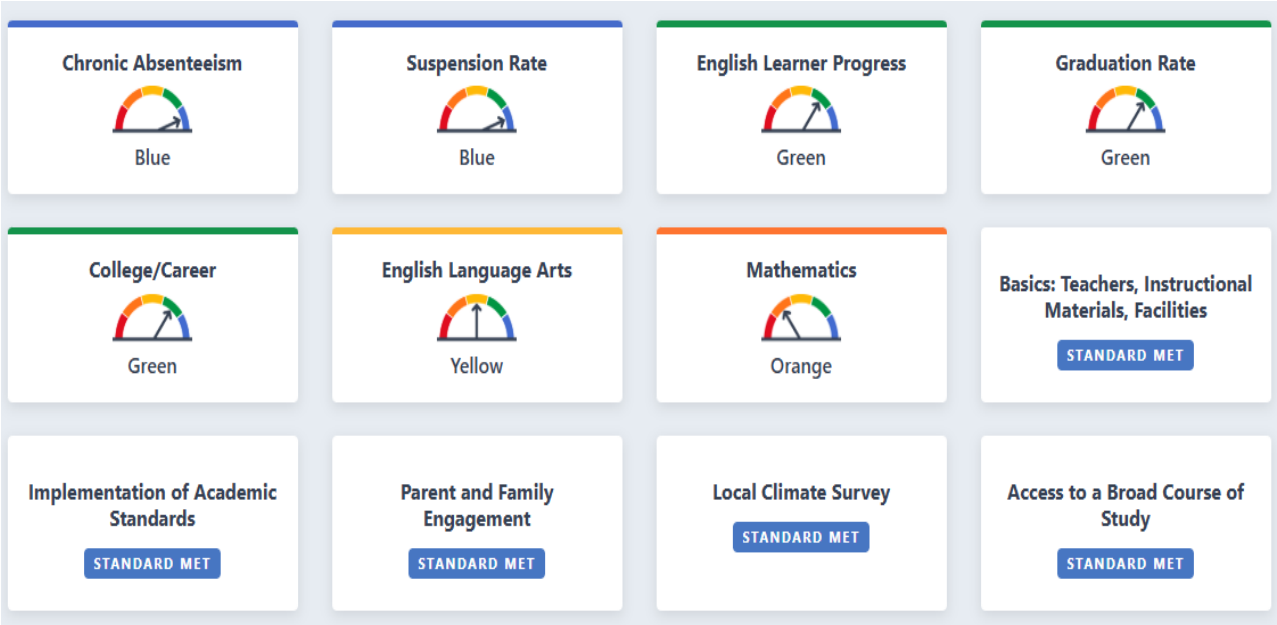


**TCS/BUSD/STATE: DIFFERENCE FROM STANDARD [2024-2025]**

| Indicator | TCS | BUSD | STATE |
|---|---|---|---|
| Chronic Absenteeism | 0% | 3.3% | 18.6% |
| Suspension Rate | 0% | .1% | -.4% |
| Graduation Rate | 95.5% | N/A | 86.7% |
| CCI | 59.5% | N/A | 51.7% |
| English Learner Progress | 48.6% | 73.7% | 46.4% |
| ELA | 7.3 | 43.8 | -8.1 |
| Math | -34.4 | 32.5 | -42.4 |

The above table reflects that although TCS did not meet or exceed BUSD's performance indicator outcomes in ELA, Math and EL progress, TCS has outperformed the State on every performance indicator in 2024-2025.

**2023-2024 – TCS Met All Local Indicators**

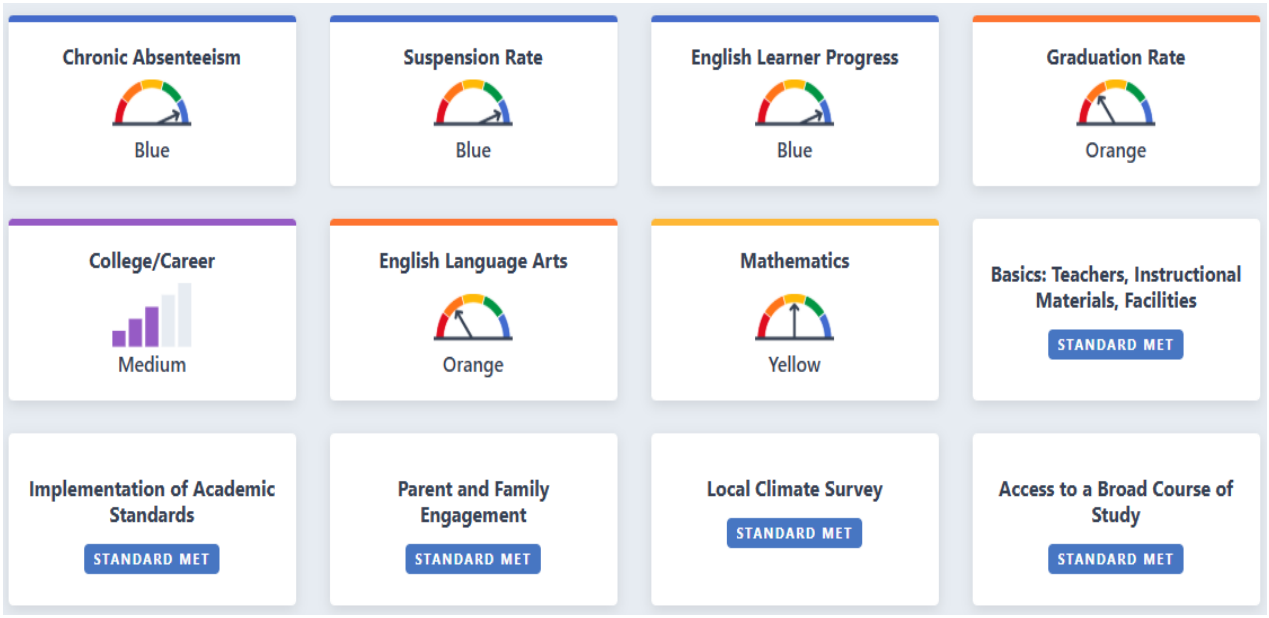



**TCS/BUSD/STATE: DIFFERENCE FROM STANDARD [2023-2024]**

| Indicator | TCS | BUSD | STATE |
|---|---|---|---|
| Chronic Absenteeism | 0% | 9.7% | 18.6% |
| Suspension Rate | 0% | 2.1% | -.4% |
| Graduation Rate | 93.8% | N/A | 86.7% |
| CCI | 42.1% | N/A | 45.3% |
| English Learner Progress | 56.6% | 56.3% | 45.7% |
| ELA | -5.7 | 36.7 | -13.2 |
| Math | -44.8 | 27.2 | -47.6 |

The above table reflects that although TCS did not meet or exceed BUSD's performance indicator outcomes in ELA and Math, TCS has outperformed the State on six out of the seven performance indicators in 2023-2024.

**2022-2023 – TCS Met All Local Indicators**




**TCS/BUSD/STATE: DIFFERENCE FROM STANDARD [2022-2023]**

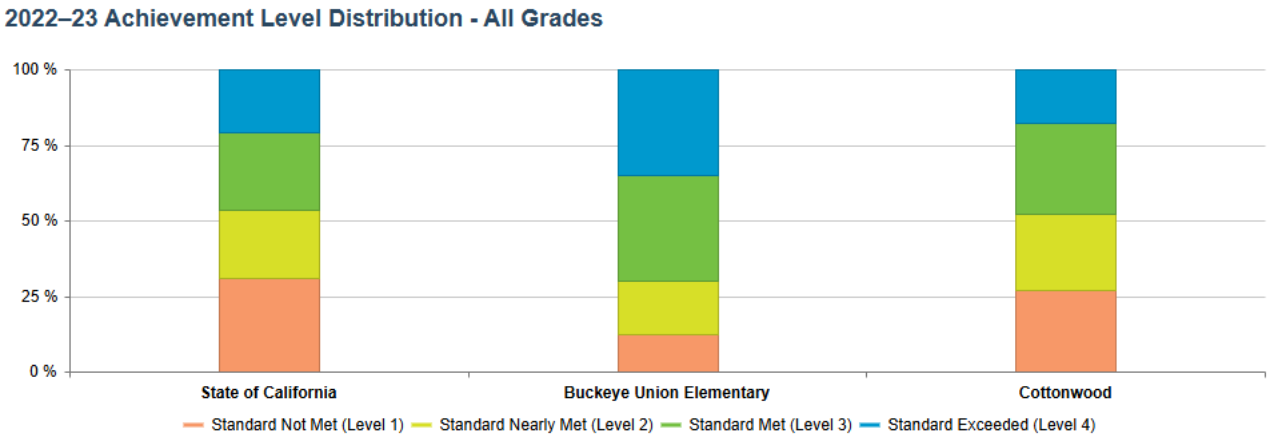
| Indicator | TCS | BUSD | STATE |
|---|---|---|---|
| Chronic Absenteeism | 0% | 12.1% | 24.3% |
| Suspension Rate | 0% | .4% | 3.5% |
| Graduation Rate | 90.1% | N/A | 86.4% |
| CCI | 38.6% | N/A | 43.9% |
| English Learner Progress | 57.1% | 63.2% | 48.7% |
| ELA | -11.8 | 40.9 | -13.6 |
| Math | -47.1 | 23.9 | -49.1 |

The above table reflects that although TCS did not meet or exceed BUSD's performance indicator outcomes in ELA, Math and EL progress, TCS has outperformed the State on six out of the seven performance indicators in 2022-2023.

## B. Schoolwide Academic Performance

To supplement the information provided in the California School Dashboard, the results from the California Assessment of Student Performance and Progress ("CAASPP") Smarter Balanced Summative Assessments ("SBAC") are provided below. Specifically, the Figures below include results for both TCS and Buckeye USD (grades 3-8 only) as well as for the State of California as follows:

- **ELA (2022-2023)**

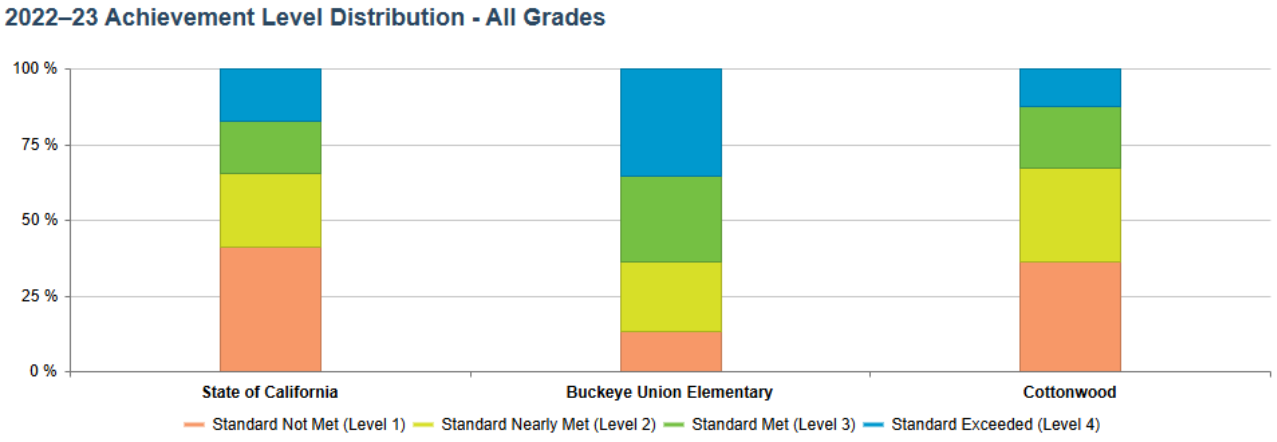



**Percentage of Students at Each Performance Level**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Standard Exceeded (Level 4) Percentage of students by grade for level | 20.73 % | 34.98 % | 17.77 % |
| Standard Met (Level 3) Percentage of students by grade for level | 25.93 % | 34.81 % | 30.18 % |
| Standard Nearly Met (Level 2) Percentage of students by grade for level | 22.17 % | 17.91 % | 24.89 % |
| Standard Not Met (Level 1) Percentage of students by grade for level | 31.17 % | 12.30 % | 27.15 % |

- *In 2022-2023, TCS' ELA proficiency rates have outperformed the State and in general BUSD's proficiency rates have outperformed TCS' proficiency rates, with TCS' Standard Met rate relatively consistent with BUSD's proficiency rate.*

- **Math (2022-2023)**

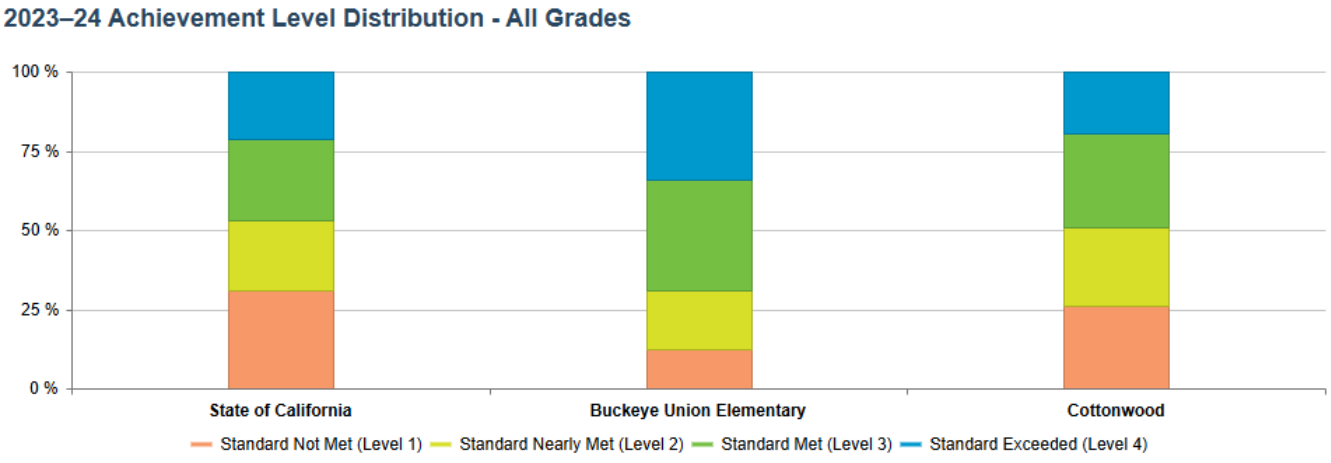



**Percentage of Students at Each Performance Level**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Standard Exceeded (Level 4) Percentage of students by grade for level | 17.14 % | 35.45 % | 12.25 % |
| Standard Met (Level 3) Percentage of students by grade for level | 17.48 % | 28.20 % | 20.56 % |
| Standard Nearly Met (Level 2) Percentage of students by grade for level | 24.06 % | 23.17 % | 30.77 % |
| Standard Not Met (Level 1) Percentage of students by grade for level | 41.32 % | 13.19 % | 36.41 % |

- *In 2022-2023, TCS' Math proficiency rates have outperformed the State and in general BUSD's proficiency rates have outperformed TCS' proficiency rates, with TCS' Standard Met rate relatively consistent with BUSD's proficiency rate.*

- **ELA (2023-2024)**

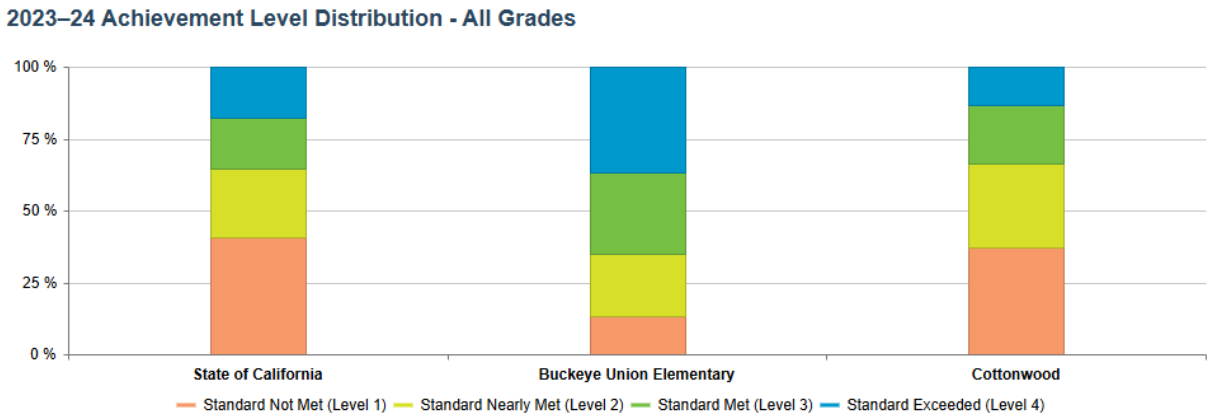


**Percentage of Students at Each Performance Level**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Standard Exceeded (Level 4)<br>Percentage of students by grade for level | 21.02 % | 33.90 % | 19.39 % |
| Standard Met (Level 3)<br>Percentage of students by grade for level | 26.02 % | 35.03 % | 29.86 % |
| Standard Nearly Met (Level 2)<br>Percentage of students by grade for level | 21.80 % | 18.80 % | 24.76 % |
| Standard Not Met (Level 1)<br>Percentage of students by grade for level | 31.15 % | 12.26 % | 25.99 % |

- *In 2023-2024, TCS' ELA proficiency rates have outperformed the State and in general BUSD's proficiency rates have outperformed TCS' proficiency rates, with TCS' Standard Met rate relatively consistent with BUSD's proficiency rate.*

- **Math (2023-2024)**

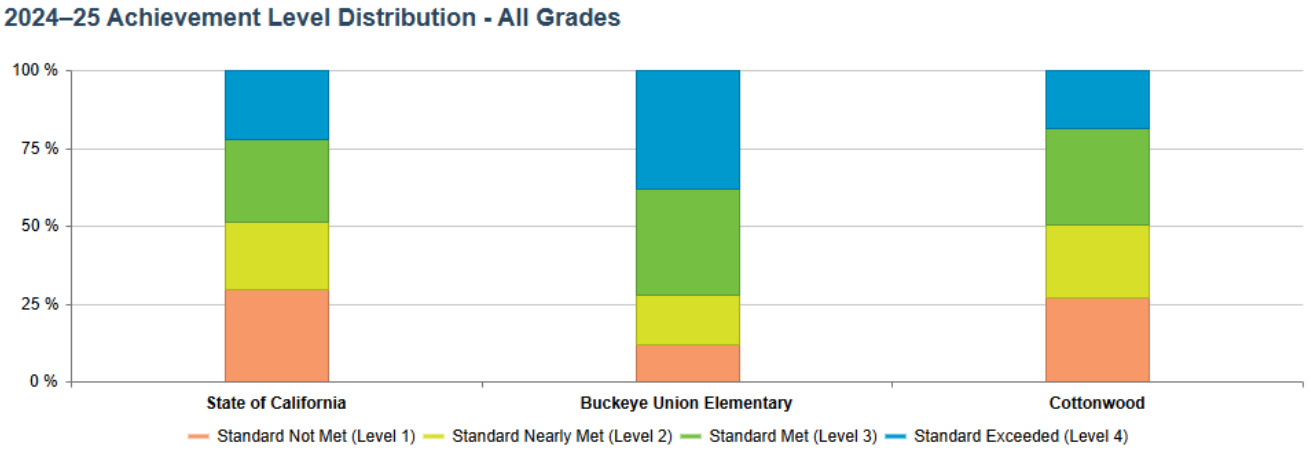



**Percentage of Students at Each Performance Level**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Standard Exceeded (Level 4)<br>Percentage of students by grade for level | 17.89 % | 36.66 % | 13.07 % |
| Standard Met (Level 3)<br>Percentage of students by grade for level | 17.65 % | 28.53 % | 20.76 % |
| Standard Nearly Met (Level 2)<br>Percentage of students by grade for level | 23.91 % | 21.71 % | 29.11 % |
| Standard Not Met (Level 1)<br>Percentage of students by grade for level | 40.55 % | 13.11 % | 37.06 % |

- *In 2023-2024, TCS' Math proficiency rates have outperformed the State and in general BUSD's proficiency rates have outperformed TCS' proficiency rates, with TCS' Standard Met rate relatively consistent with BUSD's proficiency rate.*

- **ELA (2024-2025)**

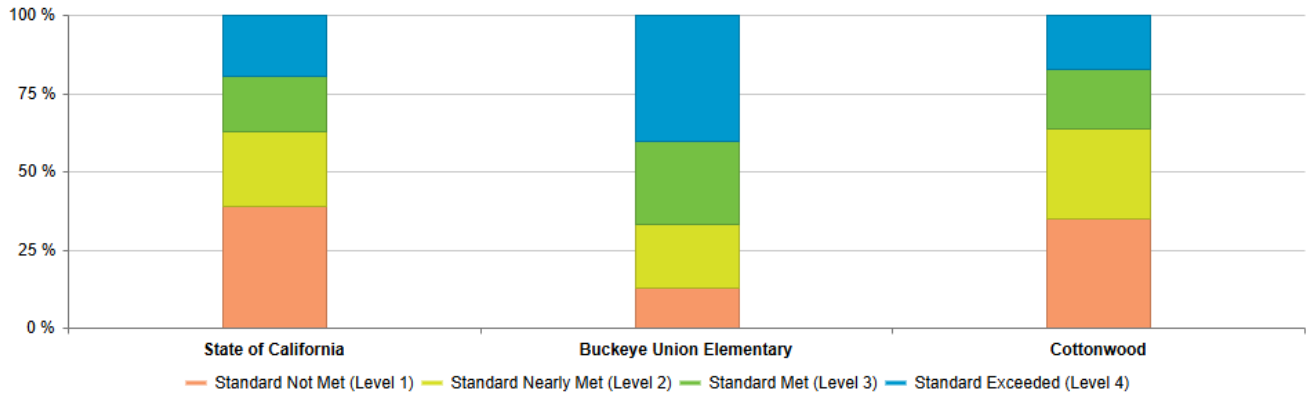



**Percentage of Students at Each Performance Level**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Standard Exceeded (Level 4) Percentage of students by grade for level | 22.29 % | 38.10 % | 18.67 % |
| Standard Met (Level 3) Percentage of students by grade for level | 26.53 % | 33.88 % | 30.88 % |
| Standard Nearly Met (Level 2) Percentage of students by grade for level | 21.76 % | 16.28 % | 23.40 % |
| Standard Not Met (Level 1) Percentage of students by grade for level | 29.43 % | 11.74 % | 27.05 % |

- *In 2024-2025, TCS' ELA proficiency rates have outperformed the State and in general BUSD's proficiency rates have outperformed TCS' proficiency rates, with TCS' Standard Met rate relatively consistent with BUSD's proficiency rate.*

- **Math (2024-2025)**



**Percentage of Students at Each Performance Level**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Standard Exceeded (Level 4) Percentage of students by grade for level | 19.37 % | 40.18 % | 17.13 % |
| Standard Met (Level 3) Percentage of students by grade for level | 17.93 % | 26.42 % | 19.16 % |
| Standard Nearly Met (Level 2) Percentage of students by grade for level | 23.72 % | 20.78 % | 28.60 % |
| Standard Not Met (Level 1) Percentage of students by grade for level | 38.98 % | 12.62 % | 35.11 % |

- *In 2024-2025, TCS' Math proficiency rates have outperformed the State and in general BUSD's proficiency rates have outperformed TCS' proficiency rates, with TCS' Standard Met rate relatively consistent with BUSD's proficiency rate.*

## C. Key Student Group Academic Performance

The following comparison of academic performance is included to assess whether TCS' educational program is sound for *all* students. Figure 4 below compare TCS' performance on the ELA and Math SBAC to the District average and State average for the respective student groups for the following student groups: Socioeconomically disadvantaged students, Black/African American students, Hispanic/Latino students, students with disabilities, and English Learners. 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). Additionally, results for the California Alternate Assessments (CAAs) were not included as TCS did not surpass the required threshold of tested students and, therefore, no data is available.

**Figure 4:** Comparison of Academic Performance Analysis

| | Black of African American | | | Economically Disadvantaged | | | English Learner | | | Hispanic or Latino | | | Students w/Disabilities | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Met or Exceeded | | | Met or Exceeded | | | Met or Exceeded | | | Met or Exceeded | | | Met or Exceeded | | |
| | TCS | BUSD | STATE | TCS | BUSD | STATE | TCS | BUSD | STATE | TCS | BUSD | STATE | TCS | BUSD | STATE |
| **ELA: 2022-2023** | 37.93% | 39.13% | 29.85% | 42.16% | 50.66% | 35.27% | 15.39% | 21.52% | 10.87% | 53.57% | 64.98% | 51.66% | 22.61% | 28.98% | 15.75% |
| **2023-2024** | 63.63% | 42.85% | 47.75% | 44.47% | 56.43% | 36.81% | 13.6% | 26.09% | 10.28% | 53.53% | 68.67% | 52.25% | 26.77% | 29.8% | 15.83% |
| **2024-2025** | 64.29% | 64.71% | 50.22% | 42.64% | 54.72% | 38.23% | 8.79% | 13.64% | 10.41% | 48.25% | 65.13% | 55.04% | 25.17% | 34.9% | 16.95% |
| | | | | | | | | | | | | | | | |
| **Math: 2022-2023** | 46.15% | 58.33% | 29.17% | 27.66% | 46.18% | 22.91% | 15.38% | 26.19% | 9.93% | 31.25% | 55.18% | 36.02% | 13.05% | 27.88% | 12.26% |
| **2023-2024** | 45.45% | 42.86% | 31.05% | 29.31% | 52.36% | 24.98% | 17.27% | 30.99% | 10.25% | 31.31% | 56.68% | 36.77% | 15.75% | 28.48% | 12.54% |
| **2024-2025** | 57.14% | 58.82% | 33.79% | 31.01% | 48.71% | 26.19% | 21.98% | 18.75% | 11.01% | 39.86% | 56.07% | 40.1% | 15.79% | 30.34% | 13.1% |

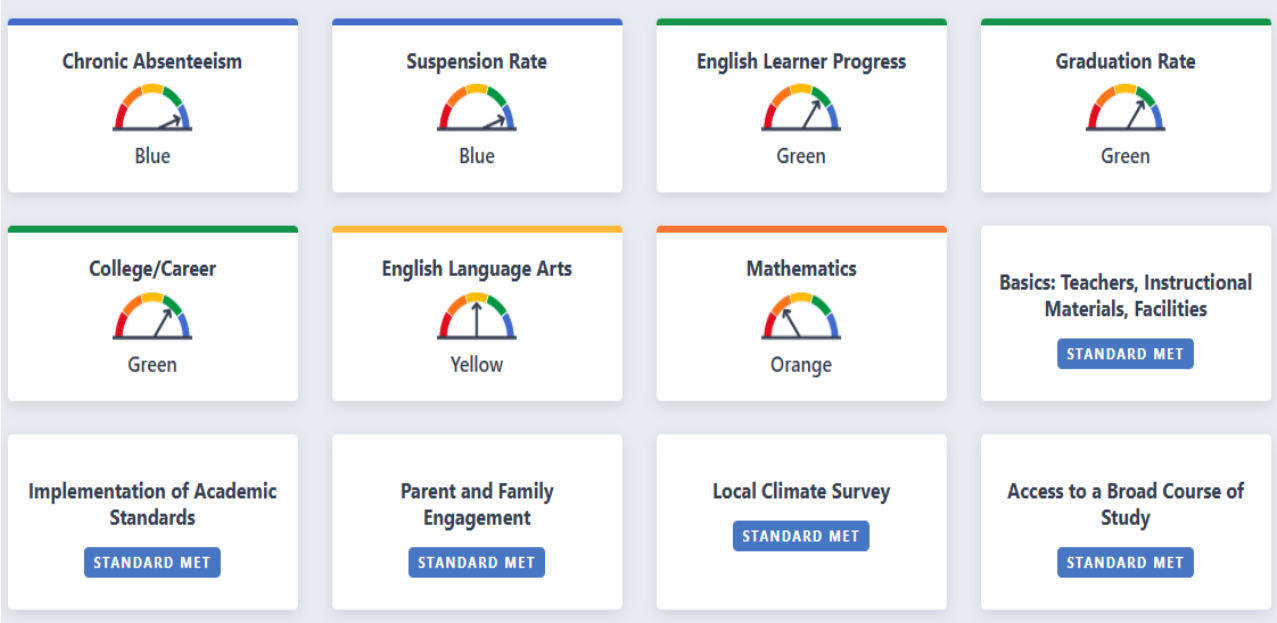
***Source**: CAASPP Results*

The above table evidences that TCS' proficiency rates for identified student subgroups have showed steady improvement over the last three (3) school years. TCS' outperformed the State and in general

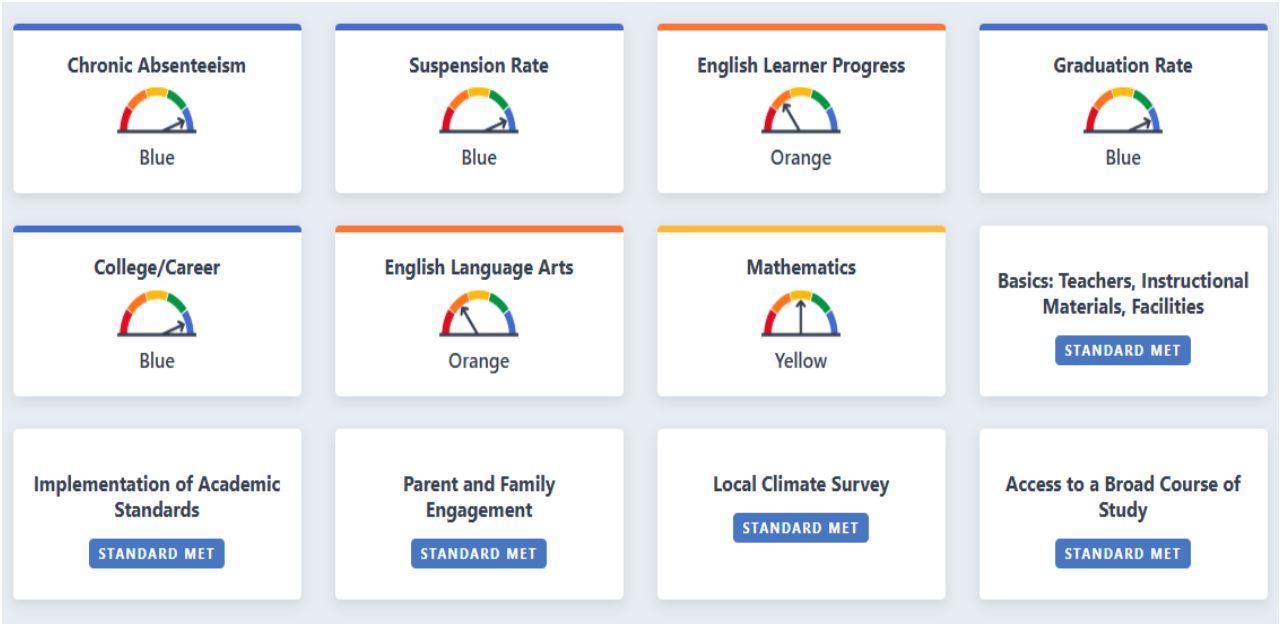
TCS' proficiency rates are relatively consistent with BUSD's proficiency rate.

## D. TCS' DASHBOARD LOCAL INDICATORS – 2024 & 2025

TCS has met all local indictors on the 2023-2024 Dashboard:




TCS has met all local indictors on the 2024-2025 Dashboard:




## E. English Learner Progress

In the 2022-2023, 2023-2024 and 2024-2025 school years, TCS tested students on the Summative English Language Proficiency Assessment (ELPAC). Figure Nos. 5-7 below shows the number of students and the percentage of these students who progressed at least one English Learner Progress Indicator (ELPI) level, maintained ELPI level 4, maintained lower ELPI levels, or decreased at least one ELPI level. As shown below, TCS' ELPAC results are comparable to BUSD.

**Figure 5**: 2022-2023 Summative ELPAC Results Comparison:

**Overall Performance**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Level 4<br>Number of students by grade for level | 172,953 | 33 | 61 |
| Level 4<br>Percentage of students by grade for level | 16.50% | 23.24% | 24.70% |
| Level 3<br>Number of students by grade for level | 354,006 | 56 | 88 |
| Level 3<br>Percentage of students by grade for level | 33.77% | 39.44% | 35.63% |
| Level 2<br>Number of students by grade for level | 308,180 | 25 | 61 |
| Level 2<br>Percentage of students by grade for level | 29.40% | 17.61% | 24.70% |
| Level 1<br>Number of students by grade for level | 213,161 | 28 | 37 |
| Level 1<br>Percentage of students by grade for level | 20.33% | 19.72% | 14.98% |
| Total<br>Number of students by grade for all levels | 1,048,300 | 142 | 247 |

**Figure 6**: 2023-2024 Summative ELPAC Results Comparison:

**Overall Performance**

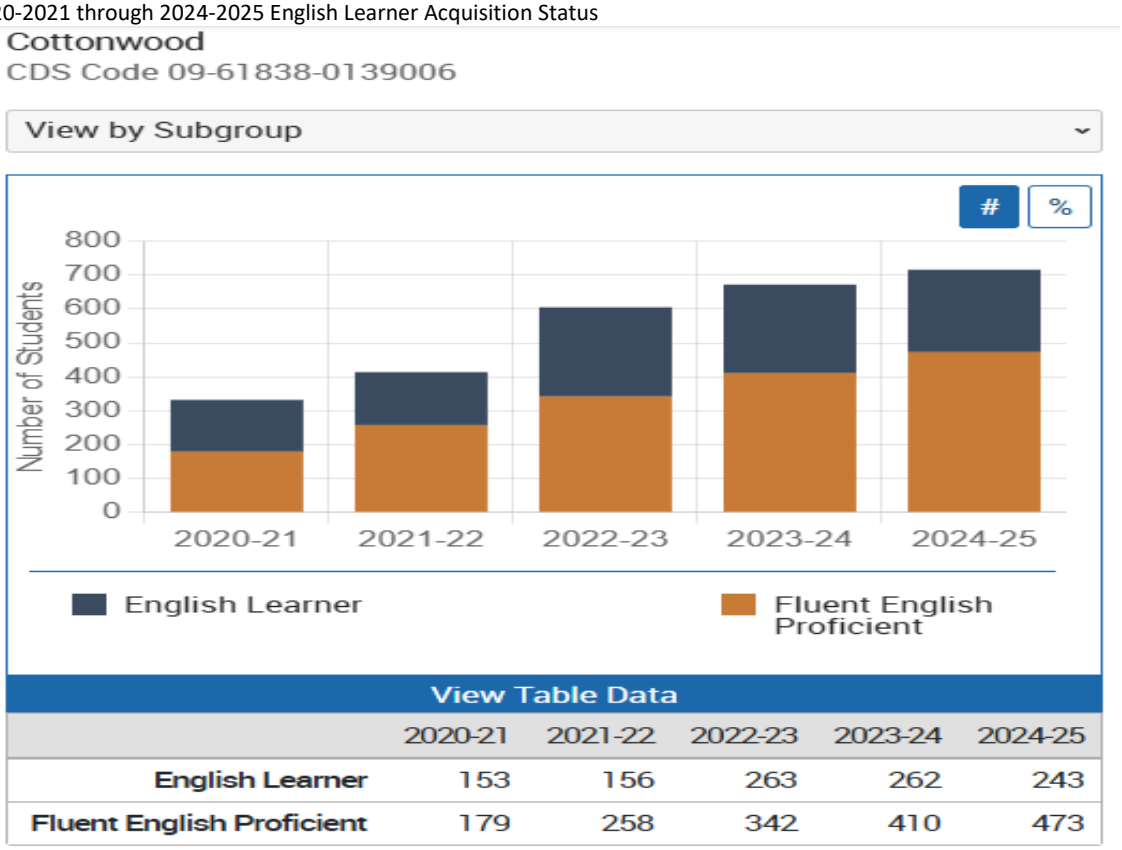
| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Level 4<br>Number of students by grade for level | 150,379 | 32 | 64 |
| Level 4<br>Percentage of students by grade for level | 14.63% | 24.43% | 25.10% |
| Level 3<br>Number of students by grade for level | 336,998 | 52 | 96 |
| Level 3<br>Percentage of students by grade for level | 32.78% | 39.69% | 37.65% |
| Level 2<br>Number of students by grade for level | 294,714 | 28 | 66 |
| Level 2<br>Percentage of students by grade for level | 28.67% | 21.37% | 25.88% |
| Level 1<br>Number of students by grade for level | 245,992 | 19 | 29 |
| Level 1<br>Percentage of students by grade for level | 23.93% | 14.50% | 11.37% |
| Total<br>Number of students by grade for all levels | 1,028,083 | 131 | 255 |

**Figure 6.1**: 2024-2025 Summative ELPAC Results Comparison:

**Overall Performance**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Level 4<br>Number of students by grade for level | 147,118 | 34 | 51 |
| Level 4<br>Percentage of students by grade for level | 15.53% | 27.64% | 21.98% |
| Level 3<br>Number of students by grade for level | 306,991 | 46 | 81 |
| Level 3<br>Percentage of students by grade for level | 32.40% | 37.40% | 34.91% |
| Level 2<br>Number of students by grade for level | 269,228 | 30 | 76 |
| Level 2<br>Percentage of students by grade for level | 28.42% | 24.39% | 32.76% |
| Level 1<br>Number of students by grade for level | 224,056 | 13 | 24 |
| Level 1<br>Percentage of students by grade for level | 23.65% | 10.57% | 10.34% |
| Total<br>Number of students by grade for all levels | 947,393 | 123 | 232 |

**Figure 7**: 2020-2021 through 2024-2025 English Learner Acquisition Status




View Table Data

| | 2020-21 | 2021-22 | 2022-23 | 2023-24 | 2024-25 |
|---|---|---|---|---|---|
| **English Learner** | 153 | 156 | 263 | 262 | 243 |
| **Fluent English Proficient** | 179 | 258 | 342 | 410 | 473 |

## F. Verified Data

The law also gives middle-performing charter schools the opportunity to provide data showing measurable increases in academic achievement, via verified data:

*In addition to the state and local indicators, the chartering authority shall consider clear and convincing evidence showing either of the following:*
*(A) The school achieved measurable increases in academic achievement, as defined by at least one year's progress for each year in school.*
*(B) Strong postsecondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers.*
*(4) Subparagraphs (A) and (B) of paragraph (3) shall be demonstrated by verified data, as defined . . .*

"Verified data" is defined in statute as "data derived from nationally recognized, valid, peer- reviewed, and reliable sources that are externally produced." (Education Code Section 47607.2(c)(1).) In November 2020, the California State Board of Education approved the criteria to define "verified data" and the list of valid and reliable assessments and measures of postsecondary outcomes as required by Education Code Section 47607.2, and supplemented the list in May 2023. From the SBE-approved list of reliable assessments, the TCS currently utilizes CAASPP (discussed above) and Renaissance Star ("STAR") assessments to meet the verified data requirement

The Cottonwood School administers the Renaissance Star Reading and Math assessments to all students in grades K–12 three times each year. These assessments help establish a starting point (baseline) at the beginning of the year and track academic growth throughout the school year. TCS uses percentile growth as a key measure of progress because it shows whether a student is growing at, below, or above the expected rate compared to students across the country.

Student growth is measured using percentile ranks in reading and math. For example, if a student is in the 50th percentile at both the beginning and end of the year, it means they are keeping up with grade-level expectations, but they haven't shown more growth than what is typical for their age.

TCS employs a multifaceted approach to monitoring academic progress through both internal data and classroom-based measures. This includes the use of state-approved diagnostic tools in Reading and Math for students in grades 1–12, as well as early literacy assessments for Transitional Kindergarten ("TK") students. To evaluate growth, TCS utilizes the Student Growth Percentile ("SGP"), a norm-referenced metric that compares a student's academic progress over time to that of academically similar peers nationwide, based on Renaissance Star assessments. SGP scores range from 1 to 99, with scores of 70 or above indicating growth that exceeds that of most peers, reflecting effective instruction and interventions.

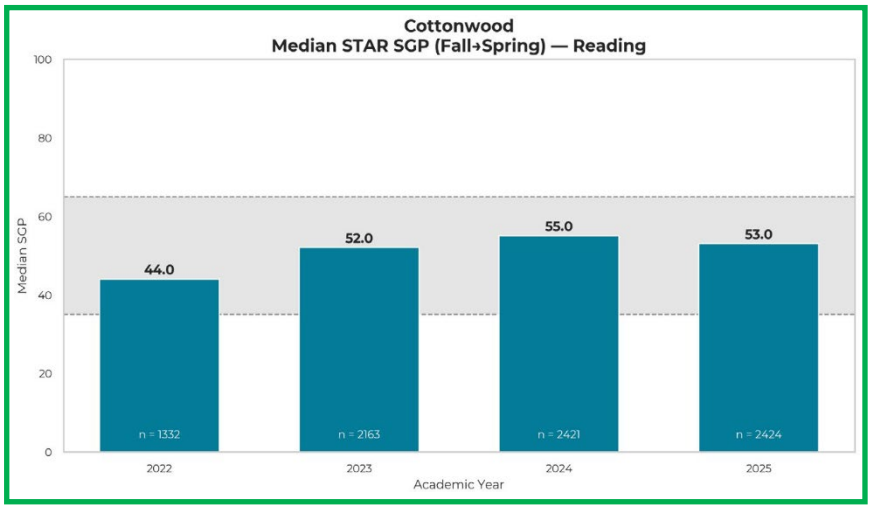
The table below shows that Cottonwood's STAR assessment data from 2022 through 2025 reflect a clear pattern of steady and sustained academic growth in both reading and math.

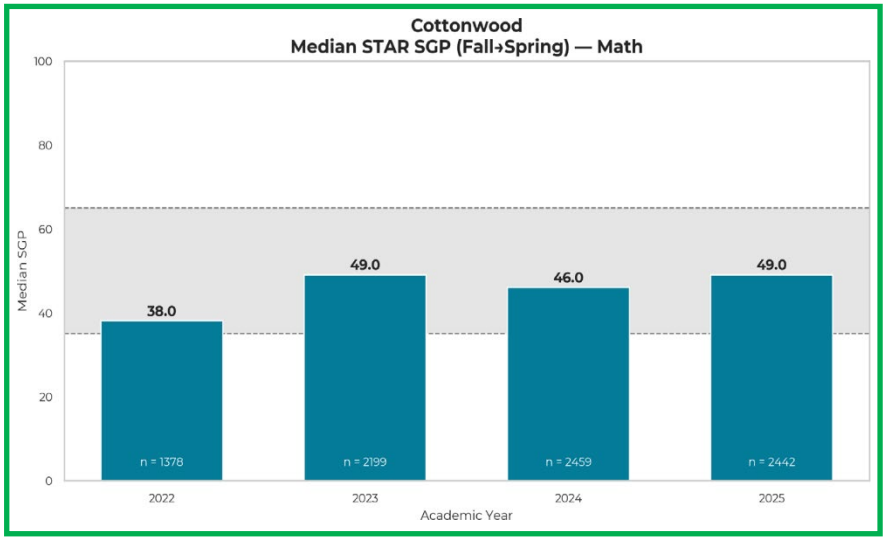
In reading, the median Student Growth Percentile (SGP) increased from 44 in 2022 to 53 in 2025. Growth accelerated between 2022 and 2024, peaking at 55, before leveling slightly in 2025. This consistent upward trajectory reflects strong literacy gains across grade levels and highlights the effectiveness of instructional practices focused on reading comprehension, vocabulary development, and fluency.

In mathematics, the median SGP improved from 38 in 2022 to 49 in 2025. Following a notable rise between 2022 and 2023, math growth remained steady through 2025. This trend demonstrates continued improvement in students' mathematical reasoning and problem-solving abilities, supported by targeted instruction and intentional curriculum alignment.

**Internal Assessment Data – Analysis of Renaissance Star:**

When taken as a whole, these increases indicate that according to internal benchmarks and standards-based grading, 75% of students demonstrated at least one year of academic growth in ELA, and 57% did so in Mathematics. Internal tracking also shows consistent longitudinal improvement across all core content areas, as shown in the tables below.




# III. 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. Evidence considered for this criterion include an analysis of the charter school's financial condition, enrollment, enrollment demographics, compliance with regulatory elements (Notices of Concern), board health and effectiveness, and staffing and credentialing.*

## A. Enrollment

TCS' nonclassroom- based programs provides a personalized approach to learning, allowing students to progress at their own pace while receiving tailored instruction, support, and enrichment that align

with their individual needs and goals. TCS' mission is to empower families through personalized learning pathways, curriculum choice, and strong academic support designed to meet the unique needs of each student.

TCS is fully accredited by the Western Association of Schools and Colleges ("WASC") through 2029, with a midcycle review scheduled for 2026. The program is aligned with the Common Core State Standards, NGSS, History-Social Science Framework, English Language Development ("ELD") Standards, and the remaining State Content Standards and meets all college entrance requirements.

In 2024, TCS was proud to be named to the Educational Results Partnership ("ERP") Honor Roll. This distinction is given to top-performing California schools that are successfully closing achievement gaps, particularly among socioeconomically disadvantaged and historically underserved students. The recognition highlights TCS' ongoing commitment to equity and academic excellence for all students.

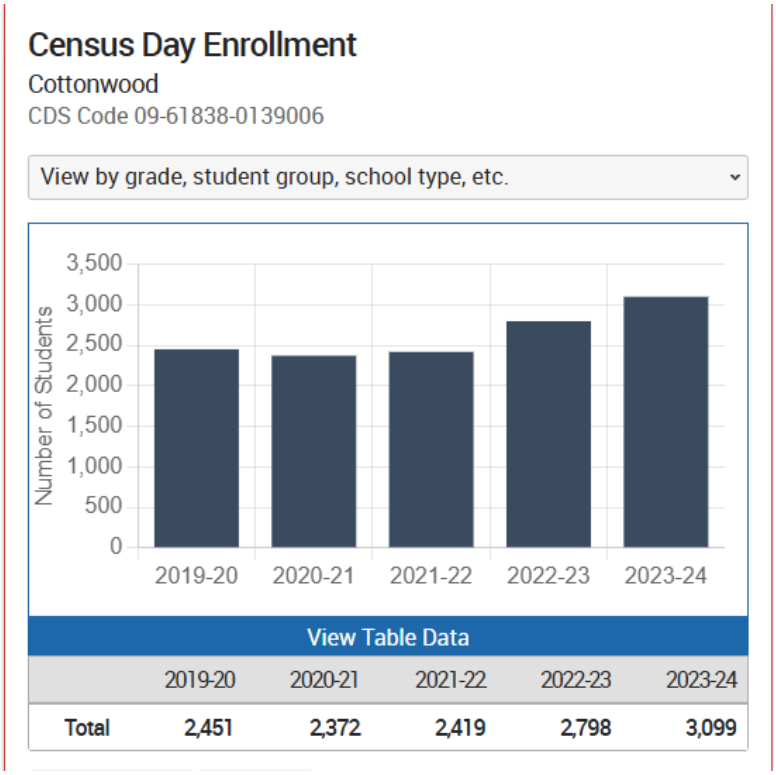
### *Total Enrollment by Year*

Over the course of the charter term, the total enrollment has increased significantly. In August 2019 TCS' was granted an initial three-year charter with the Buckeye Union School District and opened with 2,485 (10/17/19 Enrollment Report) students. In the intervening charter terms, TCS' enrollment has increased from 2,485 students to approximately 3,585 students as of November 5, 2025.

**Figure 8**: 2024-2025 Current Student Population by Grade Level

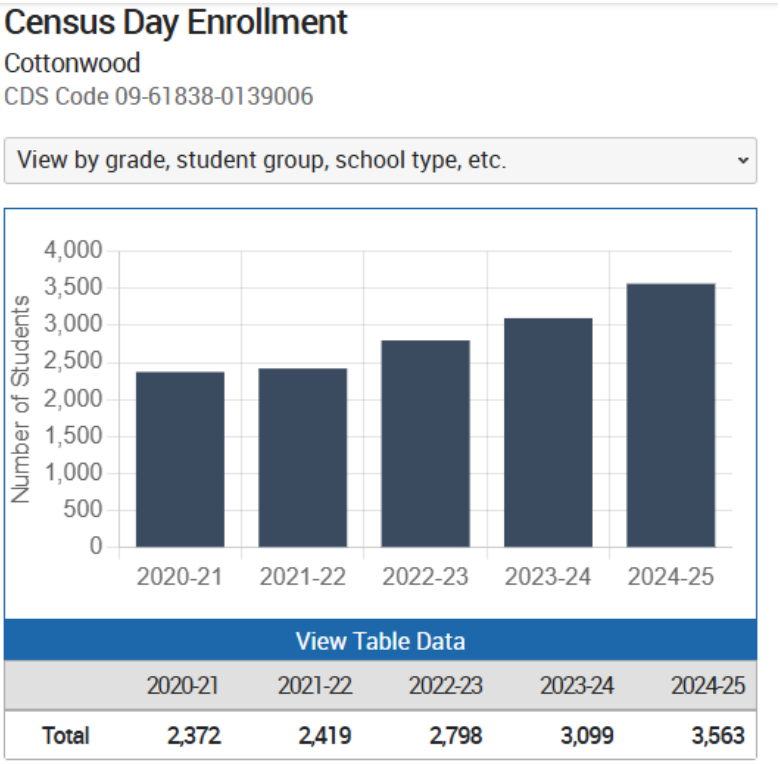
| Cottonwood Student Population 2024-25 | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | TK | K | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | Totals |
| Total TCS Enrollment | 217 | 319 | 323 | 301 | 336 | 286 | 287 | 297 | 260 | 225 | 220 | 170 | 179 | 145 | 3565 |
| Total BUSD Enrollment | 102 | 252 | 294 | 308 | 357 | 366 | 423 | 414 | 432 | 461 | 0 | 0 | 0 | 0 | 3409 |
| TCS Students who reside in BUSD | 9 | 15 | 13 | 15 | 12 | 15 | 11 | 12 | 16 | 8 | 0 | 0 | 0 | 0 | 126 |
| TCS EL | 0 | 32 | 41 | 24 | 25 | 18 | 23 | 23 | 12 | 8 | 9 | 6 | 8 | 3 | 232 |
| TCS SWD | 4 | 14 | 8 | 25 | 30 | 46 | 32 | 25 | 22 | 20 | 24 | 18 | 18 | 25 | 311 |
| TCS Free or Reduced Price Meal ("FRPM") | 76 | 118 | 143 | 118 | 154 | 115 | 106 | 132 | 109 | 102 | 110 | 74 | 100 | 62 | 1519 |
| TCS Foster Youth | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 6 | 0 | 0 | 1 | 0 | 0 | 1 | 9 |
| TCS Homeless Youth | 2 | 3 | 3 | 5 | 2 | 2 | 1 | 2 | 5 | 2 | 0 | 4 | 1 | 2 | 34 |

**Figure 9**: 2019-20 through 2023-24 Enrollment




| | 2019-20 | 2020-21 | 2021-22 | 2022-23 | 2023-24 |
|---|---|---|---|---|---|
| Total | 2,451 | 2,372 | 2,419 | 2,798 | 3,099 |

**Figure 10**: 2020-21 through 2024-25 Enrollment




| | 2020-21 | 2021-22 | 2022-23 | 2023-24 | 2024-25 |
|---|---|---|---|---|---|
| Total | 2,372 | 2,419 | 2,798 | 3,099 | 3,563 |

*Source: CDE Downloadable School Enrollment Data Files*

**Figure 11**: Projected Enrollment through 2030-31 Enrollment

| School Year | Grades | Total Projected[1] Student Enrollment |
|---|---|---|
| 2026-27 | TK-12 | 3550 |
| 2027-28 | TK-12 | 3750 |
| 2028-29 | TK-12 | 4000 |
| 2029-30 | TK-12 | 4250 |
| 2030-31 | TK-12 | 4500 |

## B. Financial Condition

TCS is in good financial standing with a healthy ending fund balance. Its most recent annual financial audit report (2024-2025) did not identify any material weaknesses. TCS has maintained a stable and fiscally responsible financial position, demonstrating prudent budgeting practices, effective internal controls, and strategic planning to ensure the long-term sustainability of the school's programs. Below is the financial information and narrative for the Cottonwood Charter School renewal proposal. The financial statements include a 5-year pro forma annual budget and a monthly cash flow statement (fiscal years 2026-27 through 2030-31).

**Figure 12**: Financial Analysis

| | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|---|---|---|---|---|---|
| | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 |
| | Preliminary Budget - 3,550 Students | Preliminary Budget - 3,750 Students | Preliminary Budget - 4,000 Students | Preliminary Budget - 4,250 Students | Preliminary Budget - 4,500 Students |
| **SUMMARY** | | | | | |
| **Revenue** | | | | | |
| LCFF Entitlement | 45,881,797 | 50,237,530 | 55,380,070 | 60,771,997 | 65,956,721 |
| Federal Revenue | 1,217,167 | 1,257,074 | 1,318,839 | 1,391,371 | 1,467,181 |
| Other State Revenues | 6,033,565 | 6,479,087 | 6,168,174 | 6,754,918 | 7,505,733 |
| Local Revenues | 61,800 | 63,654 | 65,564 | 67,531 | 69,556 |
| **Total Revenue** | **53,194,329** | **58,037,345** | **62,932,647** | **68,985,817** | **74,999,191** |

**Table F: Summary of Projected Expenses**

| | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|---|---|---|---|---|---|
| | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 |
| | Preliminary Budget - 3,550 Students | Preliminary Budget - 3,750 Students | Preliminary Budget - 4,000 Students | Preliminary Budget - 4,250 Students | Preliminary Budget - 4,500 Students |
| **Expenses** | | | | | |
| Compensation and Benefits | 33,627,332 | 36,725,158 | 40,099,215 | 43,639,179 | 47,332,707 |
| Books and Supplies | 8,183,931 | 8,873,328 | 9,772,131 | 10,669,152 | 11,612,474 |
| Services and Other Operating Expenditures | 10,459,356 | 11,354,708 | 12,337,549 | 13,448,239 | 14,610,401 |
| Depreciation | 530,383 | 530,383 | 530,383 | 530,383 | 530,383 |
| **Total Expenses** | **52,801,002** | **57,483,577** | **62,739,278** | **68,286,953** | **74,085,964** |

***Cash Flow***

Operating cash flow is projected to remain positive throughout the multi-year projections.

***TCS' multi-year budget projection ("MYBP")***

TCS' multi-year budget projection ("MYBP") indicate that TCS is projected to be in good financial standing through the term of the charter. The school appears to be managing its finances responsibly, maintaining adequate reserves, and keeping its debt at a manageable level.

**Figure 13**: Multi-Year Budget Summary

| | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|---|---|---|---|---|---|
| | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 |
| | Preliminary Budget - 3,550 Students | Preliminary Budget - 3,750 Students | Preliminary Budget - 4,000 Students | Preliminary Budget - 4,250 Students | Preliminary Budget - 4,500 Students |
| **SUMMARY** | | | | | |
| **Revenue** | | | | | |
| LCFF Entitlement | 45,881,797 | 50,237,530 | 55,380,070 | 60,771,997 | 65,956,721 |
| Federal Revenue | 1,217,167 | 1,257,074 | 1,318,839 | 1,391,371 | 1,467,181 |
| Other State Revenues | 6,033,565 | 6,479,087 | 6,168,174 | 6,754,918 | 7,505,733 |
| Local Revenues | 61,800 | 63,654 | 65,564 | 67,531 | 69,556 |
| **Total Revenue** | **53,194,329** | **58,037,345** | **62,932,647** | **68,985,817** | **74,999,191** |
| **Expenses** | | | | | |
| Compensation and Benefits | 33,627,332 | 36,725,158 | 40,099,215 | 43,639,179 | 47,332,707 |
| Books and Supplies | 8,183,931 | 8,873,328 | 9,772,131 | 10,669,152 | 11,612,474 |
| Services and Other Operating Expen | 10,459,356 | 11,250,646 | 12,337,549 | 13,448,239 | 14,610,401 |
| Depreciation | 530,383 | 530,383 | 530,383 | 530,383 | 530,383 |
| **Total Expenses** | **52,801,002** | **57,379,516** | **62,739,278** | **68,286,953** | **74,085,964** |
| **Operating Income** | **393,327** | **657,829** | **193,368** | **698,864** | **913,227** |
| **Fund Balance** | | | | | |
| Beginning Balance (Unaudited) | 19,063,275 | 19,456,603 | 20,114,432 | 20,307,800 | 21,006,664 |
| Audit Adjustment | - | - | - | - | - |
| Beginning Balance (Audited) | 19,063,275 | 19,456,603 | 20,114,432 | 20,307,800 | 21,006,664 |
| Operating Income | 393,327 | 657,829 | 193,368 | 698,864 | 913,227 |
| **Ending Fund Balance** | **19,456,603** | **20,114,432** | **20,307,800** | **21,006,664** | **21,919,891** |
| ***Ending Fund Balance (% of Expense)*** | ***37%*** | ***35%*** | ***32%*** | ***31%*** | ***30%*** |
| Beginning Cash Balance | 15,483,839 | 16,258,005 | 16,111,004 | 15,817,553 | 16,297,269 |
| **Ending Cash Balance** | **16,258,005** | **16,111,004** | **15,817,553** | **16,297,269** | **17,198,591** |
| ***Cash Balance (% of Expenditures)*** | ***31%*** | ***28%*** | ***25%*** | ***24%*** | ***23%*** |
| **Detail** | | | | | |
| **ADA** | | | | | |
| TK-3 | 1395.9 | 1465.2 | 1569.2 | 1673.1 | 1777.1 |
| 4-6 | 891.0 | 920.7 | 965.3 | 1009.8 | 1054.4 |
| 7-8 | 495.0 | 544.5 | 594.0 | 643.5 | 693.0 |
| 9-12 | 732.6 | 782.1 | 831.6 | 881.1 | 930.6 |
| Total ADA | **3514.5** | **3712.5** | **3960.0** | **4207.5** | **4455.0** |

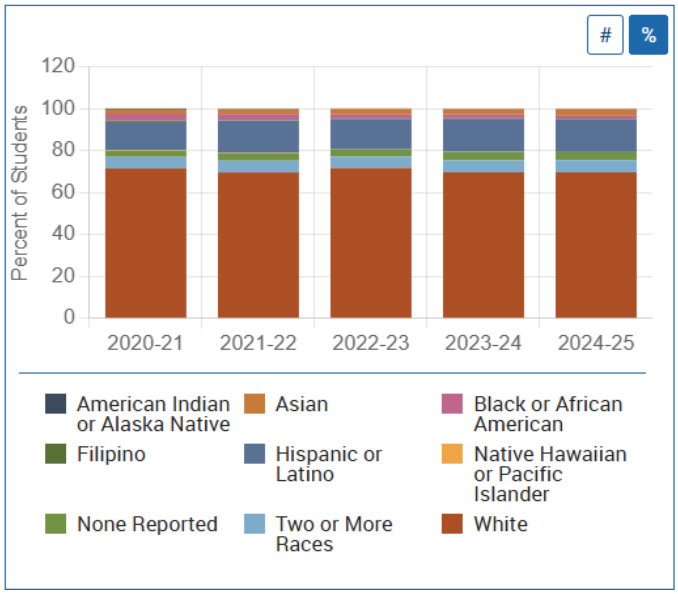
## C. Enrollment Demographics

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*". The full description is included on pages 75-76 of the charter petition. The current section includes the school's enrollment demographic data for further context.

### *Enrollment Demographics Comparison*

Enrollment demographics for the 2024-25 school year are included in the table below. Education Code specifies that a charter school should aspire to achieve a demographic balance which is reflective of the *entire* District. TCS' enrollment demographics is comparable to BUSD.

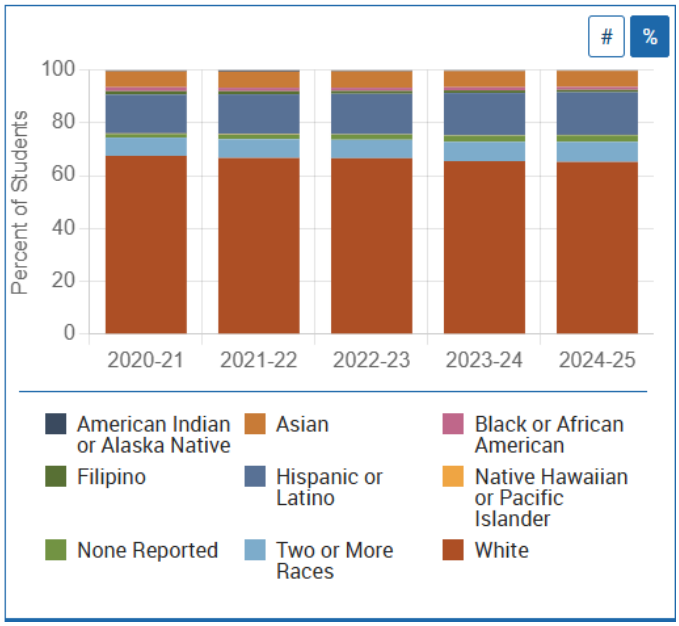
**Figure 14**: 2024-25 Enrollment Demographics – Cottonwood School




View Table Data

| | 2020-21 | 2021-22 | 2022-23 | 2023-24 | 2024-25 |
|---|---|---|---|---|---|
| American Indian or Alaska Native | 0.5 % | 0.3 % | 0.2 % | 0.2 % | 0.2 % |
| Asian | 1.9 % | 2.1 % | 2.4 % | 2.5 % | 2.8 % |
| Black or African American | 3.4 % | 3.1 % | 2.1 % | 1.8 % | 1.7 % |
| Filipino | 0.7 % | 0.2 % | 0.3 % | 0.3 % | 0.4 % |
| Hispanic or Latino | 13.3 % | 15.3 % | 14.5 % | 15.7 % | 15.6 % |
| Native Hawaiian or Pacific Islander | 0.3 % | 0.2 % | 0.1 % | 0.1 % | 0 % |
| None Reported | 3 % | 3.6 % | 3.3 % | 4.1 % | 3.8 % |
| Two or More Races | 5.5 % | 5.6 % | 5.5 % | 5.6 % | 5.8 % |
| White | 71.5 % | 69.6 % | 71.7 % | 69.7 % | 69.7 % |

2024-25 Enrollment Demographics – BUSD



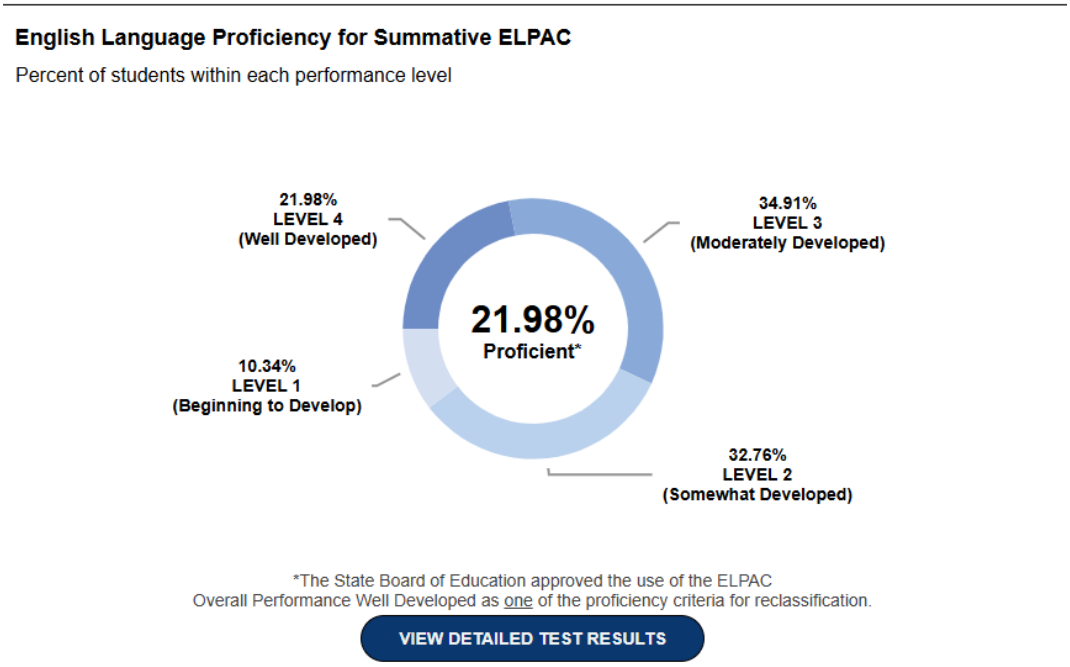

View Table Data

| | 2020-21 | 2021-22 | 2022-23 | 2023-24 | 2024-25 |
|---|---|---|---|---|---|
| American Indian or Alaska Native | 0.4 % | 0.5 % | 0.4 % | 0.4 % | 0.3 % |
| Asian | 6 % | 6.1 % | 6.2 % | 6.1 % | 6.1 % |
| Black or African American | 1.5 % | 1.3 % | 1.2 % | 1.2 % | 1.1 % |
| Filipino | 1.3 % | 1.2 % | 1.1 % | 1 % | 0.9 % |
| Hispanic or Latino | 14.7 % | 15 % | 15.3 % | 16 % | 16.2 % |
| Native Hawaiian or Pacific Islander | 0.2 % | 0.2 % | 0.1 % | 0.1 % | 0.1 % |
| None Reported | 1.4 % | 1.8 % | 2 % | 2.4 % | 2.5 % |
| Two or More Races | 6.9 % | 7.1 % | 7 % | 7.3 % | 7.6 % |
| White | 67.5 % | 66.7 % | 66.6 % | 65.5 % | 65.2 % |

### *English Learner Enrollment*

As shown previously, during the 2024-25 school year, approximately 6.8% of TCS' total enrollment were English Learners. TCS' English Learner data is comparable to BUSD.

**Figure 15**: TCS 2024-25 English Learner Proficiency




BUSD 2024-2025 English Learner Proficiency

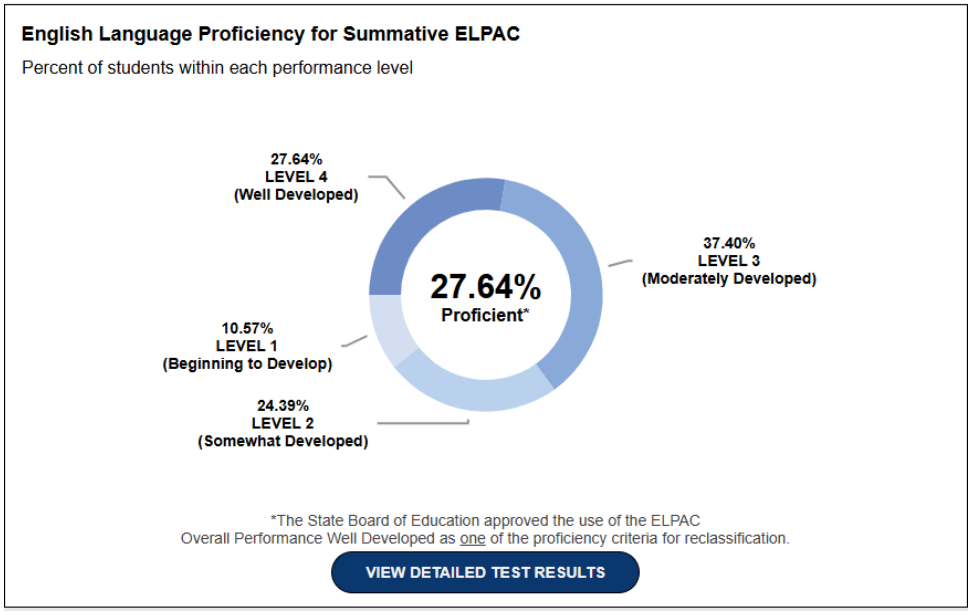


**Figure 16**: 2024-25 English Learners Comparison

**Overall Performance**

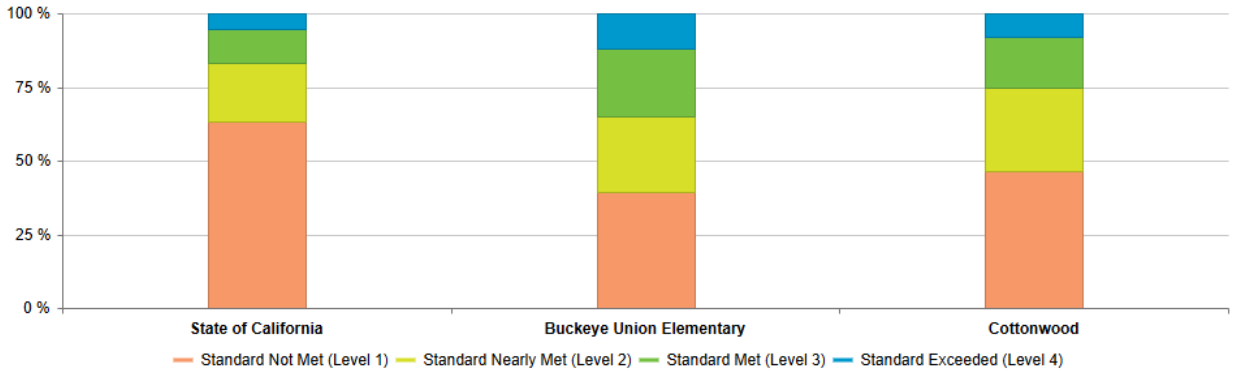
| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Level 4<br>Number of students by grade for level | 172,953 | 33 | 61 |
| Level 4<br>Percentage of students by grade for level | 16.50% | 23.24% | 24.70% |
| Level 3<br>Number of students by grade for level | 354,006 | 56 | 88 |
| Level 3<br>Percentage of students by grade for level | 33.77% | 39.44% | 35.63% |
| Level 2<br>Number of students by grade for level | 308,180 | 25 | 61 |
| Level 2<br>Percentage of students by grade for level | 29.40% | 17.61% | 24.70% |
| Level 1<br>Number of students by grade for level | 213,161 | 28 | 37 |
| Level 1<br>Percentage of students by grade for level | 20.33% | 19.72% | 14.98% |
| Total<br>Number of students by grade for all levels | 1,048,300 | 142 | 247 |

### *Special Education Enrollment*

As shown previously, during the 2024-25 school year, less than 1% of TCS' total enrollment were students with disabilities. BUSD's total enrollment of students with disabilities was approximately 21%. As illustrated in the figures below, TCS' students with disabilities outperformed the State average and is comparable to BUSD.

- **ELA (2024-2025)**

**Figure 17**: 2024-25 Students with Disabilities Comparison



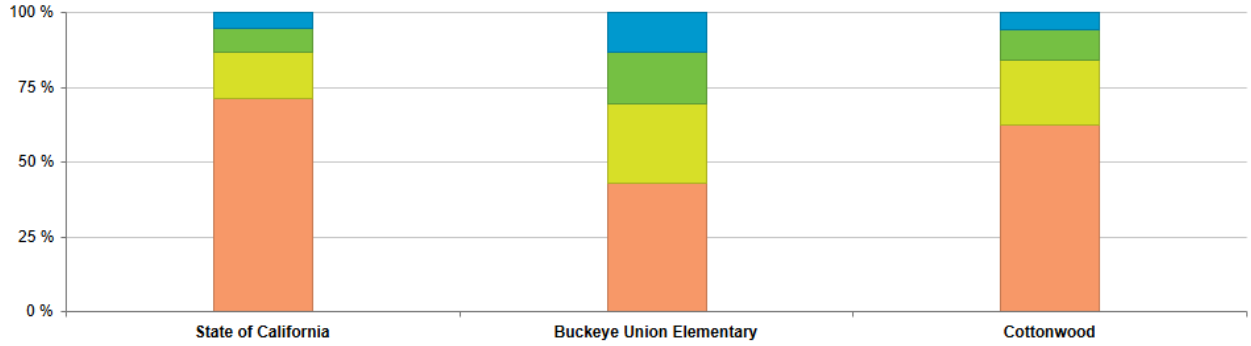
**Percentage of Students at Each Performance Level**

**Overall Achievement**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Standard Exceeded (Level 4) Percentage of students by grade for level | 5.48 % | 11.99 % | 7.95 % |
| Standard Met (Level 3) Percentage of students by grade for level | 11.47 % | 22.91 % | 17.22 % |
| Standard Nearly Met (Level 2) Percentage of students by grade for level | 19.72 % | 25.91 % | 28.48 % |
| Standard Not Met (Level 1) Percentage of students by grade for level | 63.33 % | 39.19 % | 46.36 % |

- **MATH (2024-2025)**

**Figure 18**: 2024-25 Students with Disabilities Comparison




**Percentage of Students at Each Performance Level**

**Overall Achievement**

| Reporting Categories | State of California | Buckeye Union Elementary | Cottonwood |
|---|---|---|---|
| Mean Scale Score | N/A | N/A | N/A |
| Standard Exceeded (Level 4) Percentage of students by grade for level | 5.51 % | 13.25 % | 5.92 % |
| Standard Met (Level 3) Percentage of students by grade for level | 7.59 % | 17.09 % | 9.87 % |
| Standard Nearly Met (Level 2) Percentage of students by grade for level | 15.83 % | 26.92 % | 21.71 % |
| Standard Not Met (Level 1) Percentage of students by grade for level | 71.08 % | 42.74 % | 62.50 % |

## 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 CDE/Charter Schools and/or the District 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. Neither TCS or

BUSD have received any Notices of Concern since October 2019, which concern was ultimately resolved.

**Figure 19**: Notices of Concern and/or Notices to Cure and Correct

| School Year | Notices of Concern | Area(s) of Concern | Remedy |
|---|---|---|---|
| **2019-2020** | 1 | Financial/Board Policy | Yes |
| **2020-2021** | 0 | | |
| **2021-2025** | 0 | | |

## 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. An analysis of TCS evidences that:

- Board members possess a diversity of backgrounds and array of appropriate and relevant skills with which to oversee TCS;
- Board members have a shared understanding of and commitment to TCS' mission and vision;
- Board members are knowledgeable about TCS' operations, successes and challenges;
- Board members demonstrate an understanding of their role in providing oversight to TCS;
- All governing board meetings are accessible to the community and the decision-making process is clear and transparent;
- The Board complies with its own board policies and bylaws as well as with applicable state and federal laws regarding governance;
- The Governing Board is an effective decision-making body which is active and meets its governance obligations.

## F. Staffing and Teacher Credentialing

Education Code section 47605(l)(1) requires 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"). BUSD acts as the "Monitoring Authority" for all charter schools authorized by BUSD, which requires the annual review of educator assignments. The figures below represent the CalSAAS results for educator assignments in the 2020-21 thru 2023-2024 school years, the most recent years for which data is available. As shown below:

- During the 2023-24 school year, approximately 51.1% of assignments at TCS were authorized by an educator holding a clear or preliminary credential or by a local assignment option.
- During the 2024-25 school year, there was 1.5% total assignment at TCS that was ineffective.

**Figure 20**: 2020-21 thru 2023-24 Educator Credentials by Type

## 2020-21 Teacher Preparation and Placement

| Authorization/Assignment | School Number | School Percent | District Number | District Percent | State Number | State Percent |
|---|---|---|---|---|---|---|
| Fully (Preliminary or Clear) Credentialed for Subject and Student Placement (properly assigned) | 50.20 | 50.12 | 310.20 | 78.68 | 228366.10 | 83.12 |
| Intern Credential Holders Properly Assigned | 0.00 | 0.00 | 0.80 | 0.22 | 4205.90 | 1.53 |
| Teachers Without Credentials and Misassignments ("ineffective" under ESSA) | 0.20 | 0.21 | 1.30 | 0.35 | 11216.70 | 4.08 |
| Credentialed Teachers Assigned Out-of-Field ("out-of-field" under ESSA) | 43.70 | 43.61 | 73.60 | 18.68 | 12115.80 | 4.41 |
| Unknown/Incomplete/NA | 6.00 | 6.04 | 8.10 | 2.07 | 18854.30 | 6.86 |
| Total Teaching Positions | 100.30 | 100.00 | 394.30 | 100.00 | 274759.10 | 100.00 |

Note: The data in this table is based on full-time equivalent (FTE) status. One FTE equals one staff member working full-time; one FTE could also represent two staff members who each work 50 percent of full-time. Additionally, an assignment is defined as a position that an educator is assigned based on setting, subject, and grade level. An authorization is defined as the services that an educator is authorized to provide to students.

## 2021-22 Teacher Preparation and Placement

| Authorization/Assignment | School Number | School Percent | District Number | District Percent | State Number | State Percent |
|---|---|---|---|---|---|---|
| Fully (Preliminary or Clear) Credentialed for Subject and Student Placement (properly assigned) | 49.90 | 51.74 | 315.10 | 78.88 | 234405.20 | 84.00 |
| Intern Credential Holders Properly Assigned | 0.00 | 0.00 | 1.50 | 0.38 | 4853.00 | 1.74 |
| Teachers Without Credentials and Misassignments ("ineffective" under ESSA) | 2.00 | 2.07 | 3.00 | 0.75 | 12001.50 | 4.30 |
| Credentialed Teachers Assigned Out-of-Field ("out-of-field" under ESSA) | 44.30 | 45.93 | 77.40 | 19.38 | 11953.10 | 4.28 |
| Unknown/Incomplete/NA | 0.20 | 0.26 | 2.40 | 0.60 | 15831.90 | 5.67 |
| Total Teaching Positions | 96.50 | 100.00 | 399.40 | 100.00 | 279044.80 | 100.00 |

Note: The data in this table is based on Full-Time Equivalent (FTE) status. One FTE equals one staff member working full time; one FTE could also represent two staff members who each work 50 percent of full time. Additionally, an assignment is defined as a position that an educator is assigned based on setting, subject, and grade level. An authorization is defined as the services that an educator is authorized to provide to students.

## 2022-23 Teacher Preparation and Placement

| Authorization/Assignment | School Number | School Percent | District Number | District Percent | State Number | State Percent |
|---|---|---|---|---|---|---|
| Fully (Preliminary or Clear) Credentialed for Subject and Student Placement (properly assigned) | 57.30 | 50.12 | 313.90 | 73.51 | 231142.40 | 100.00 |
| Intern Credential Holders Properly Assigned | 0.00 | 0.00 | 6.00 | 1.40 | 5566.40 | 2.00 |
| Teachers Without Credentials and Misassignments ("ineffective" under ESSA) | 0.00 | 0.00 | 3.00 | 0.71 | 14938.30 | 5.38 |
| Credentialed Teachers Assigned Out-of-Field ("out-of-field" under ESSA) | 57.10 | 49.87 | 100.40 | 23.53 | 11746.90 | 4.23 |
| Unknown/Incomplete/NA | 0.00 | 0.00 | 3.50 | 0.84 | 14303.80 | 5.15 |
| Total Teaching Positions | 114.40 | 100.00 | 427.00 | 100.00 | 277698 | 100 |

Note: The data in this table is based on Full-Time Equivalent (FTE) status. One FTE equals one staff member working full time; one FTE could also represent two staff members who each work 50 percent of full time. Additionally, an assignment is defined as a position that an educator is assigned based on setting, subject, and grade level. An authorization is defined as the services that an educator is authorized to provide to students.

| Teachers Without Credentials and Misassignments (considered "ineffective" under ESSA) | | | |
|---|---|---|---|
| **Authorization/Assignment** | **2020-21** | **2021-22** | **2022-23** |
| **Permits and Waivers** | 0.00 | 1.00 | 0 |
| **Misassignments** | 0.20 | 1.00 | 0 |
| **Vacant Positions** | 0.00 | 0.00 | 0 |
| **Total Teachers Without Credentials and** | 0.20 | 2.00 | 0 |

| Credentialed Teachers Assigned Out-of-Field (considered "out-of-field" under ESSA) | | | |
|---|---|---|---|
| **Indicator** | **2020-21** | **2021-22** | **2022-23** |
| **Credentialed Teachers Authorized on a Permit or Waiver** | 0.00 | 0.00 | 0 |
| **Local Assignment Options** | 43.70 | 44.30 | 57.1 |
| **Total Out-of-Field Teachers** | 43.70 | 44.30 | 57.1 |

| Class Assignments | | | |
|---|---|---|---|
| **Indicator** | **2020-21** | **2021-22** | **2022-23** |
| **Misassignments for English Learners** (a percentage of all the classes with English learners taught by teachers that are misassigned) | 0.70 | 0 | 1.1 |
| **No credential, permit or authorization to teach** (a percentage of all the classes taught by teachers with no record of an authorization to teach) | 0.70 | 1.9 | 0.8 |
| Note: For more information refer to the Updated Teacher Equity Definitions web page at https://www.cde.ca.gov/pd/ee/teacherequitydefinitions.asp. | | | |

*2023-2024 - CDE*

| Name | Total Teaching FTE | Clear | Out-of-Field | Intern | Ineffective | Incomplete | Unknown | N/A |
|---|---|---|---|---|---|---|---|---|
| Cottonwood | 134.4 | 51.1% | 47.4% | 0.0% | 1.5% | 0.0% | 0.0% | 0.0% |

***Source**: CDE Teaching Assignment Monitoring Outcomes by FTE Report*

TCS will ensure that teachers in the Charter School hold the Commission on Teacher Credentialing ("CTC") certificate, permit, or other document required for the teacher's certificated assignment. The Charter School may use local assignment options authorized in statute and regulations for the purpose of legally assigning certificated teachers, in the same manner as a governing board of a school district. Teachers employed by charter schools during the 2019–20 school year had until July 1, 2025, to obtain the certificate required for the teacher's certificated assignment. [Ref. Education Code Sections 47605(l)(1) and 47605.4(a)].

# IV. 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:

a. Reasonably comprehensive descriptions of all 15 required elements
b. All other information required by the Ed Code
c. All BUSD-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. The following table summarizes staff findings related to whether this standard was met for each element.

**Figure 21**: 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*

## 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 22**: 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 thru 3540.2. | Yes |
| Information regarding the proposed operation and potential effects of the charter school on the authorizer, including:<br>● The facilities to be used by the charter school, including specifically where the charter school intends to locate.<br>● The manner in which administrative services of the charter school are to be provided.<br>● 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 §47607(g); staff analysis of the charter renewal petition*

# V. 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. 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:

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

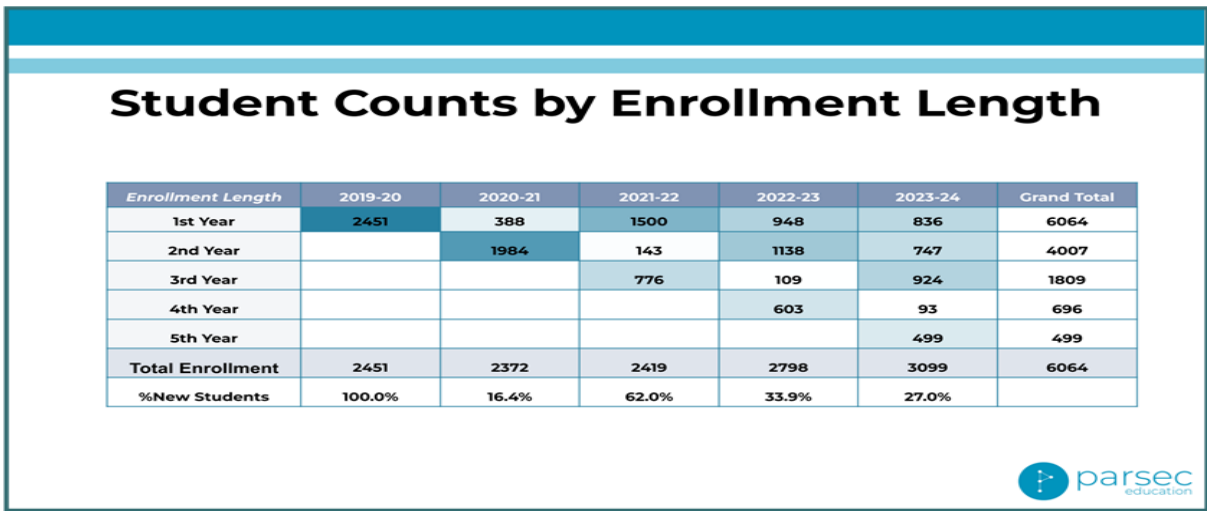
## A. State-Provided Enrollment Data

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. The data provided consists of cumulative enrollment which is the total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), regardless of whether the student is enrolled multiple times within a school or district. Cumulative enrollment is calculated at each reporting level (e.g., school, district, county, and state) and therefore is not necessarily additive from one reporting level to the next. For example, if a student is enrolled in multiple schools within a district during the academic year, they are counted once at each school, but only once in the district's cumulative enrollment. At this time, the State does not have any current cumulative enrollment data for charter schools available since the 2020-21 school year to present.

Enrollment has remained stable over the past five years. After a year where all students were new, the number of new enrollees dropped significantly the following year. It then increased noticeably, leading to a boost in overall enrollment. Since that time, the proportion of new students has remained steady,

indicating that many families choose to stay at TCS beyond their first year.

**Figure 23**: Cumulative Charter School Enrollment Data



**Student Counts by Enrollment Length**

| Enrollment Length | 2019-20 | 2020-21 | 2021-22 | 2022-23 | 2023-24 | Grand Total |
|---|---|---|---|---|---|---|
| 1st Year | 2451 | 388 | 1500 | 948 | 836 | 6064 |
| 2nd Year | | 1984 | 143 | 1138 | 747 | 4007 |
| 3rd Year | | | 776 | 109 | 924 | 1809 |
| 4th Year | | | | 603 | 93 | 696 |
| 5th Year | | | | | 499 | 499 |
| Total Enrollment | 2451 | 2372 | 2419 | 2798 | 3099 | 6064 |
| %New Students | 100.0% | 16.4% | 62.0% | 33.9% | 27.0% | |

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

Since the inception of TCS, BUSD has not received any substantiated complaints related to noncompliance with suspension and/or expulsion requirements for the charter school. There is no evidence that suggests TCS is failing to serve all students who wish to attend.

## VI. Recommendation Summary

To determine if TCS has adequately met each renewal criteria, Staff considered evidence gathered from the school's petition and supporting documentation and the school's performance during its previous charter term. Staff recommends **APPROVAL** of the renewal petition for The Cottonwood School for 5 years, beginning July 1, 2026, until June 30, 2031 to serve up to a maximum of 4,500 students in grades TK-12$^{th}$ grade.