To: The Merced County Board of Education

From: California Charter Authorizing Professionals

Subject: Report Regarding the Come Back Charter School Petition for Renewal

Date: February 24, 2026

The Merced County Office of Education (MCOE) contracted with California Charter Authorizing Professionals (CCAP) to provide a comprehensive review of all aspects of the renewal petition from its county-sponsored (and locally funded) Come Back Charter School, and to produce a report documenting any findings of fact. This comprehensive review explicitly excludes a determination of fiscal viability; MCOE staff will submit any statements regarding its fiscal analysis as an addendum to this report. This Renewal Report provides review details and findings of fact related to the renewal requirements outlined in California Education Code (EC) § 47605(b).

I. SUMMARY

Come Back Charter School (CBSC) is an independent-study high school program serving adult learners in and around Merced County. CBCS offers individualized learning plans designed to accommodate students with varying personal and professional responsibilities.

Following CBCS's submission of its renewal petition, CCAP conducted a thorough review of the submission under the EC § 47607. The evaluation of a Dashboard Alternative School Status (DASS)-eligible school's renewal petition must rely primarily on the school's performance against alternate metrics that are relevant to the student population served and are mutually agreed upon between the charter school and the authorizer during the first year of the charter term (per EC § 47607(c)(7)). These metrics are intended to be supplemented by available California Dashboard data.

MCOE did not establish the required alternative metrics in the charter term, which significantly limits the ability to conduct a complete, tailored assessment of the school's effectiveness for its unique adult learner population and places shared responsibility on both the charter school and the authorizer. Nevertheless, the publicly available

Dashboard indicators, locally reported outcomes and a review of the submitted petition reveal the following:

- **Academic Indicators**: A 0% College/Career Indicator preparedness rate across multiple years, graduation rates (both 4/5-year cohort and 1-year DASS) below the school's established 50% targets, and student growth on local assessments (e.g., STAR 360) fall short of established outcomes. The renewal petition lacks sufficient specificity regarding instructional strategies, targeted interventions, or programmatic adjustments to indicate that the school is reasonably expected to improve these outcomes for adult students.
- **Non-Academic Indicators**: CBCS faces ongoing issues with student engagement, retention, and completion. Graduation rates remain low (both overall and relative to comparable DASS programs), dropout rates are consistently high, and chronic absenteeism affects a significant portion of the student population.
- **Petition Compliance**: The renewal petition, submitted as a countywide charter under Education Code § 47605.6, includes incomplete or missing descriptions in multiple elements.

CCAP provides two options to support the Merced County Board of Education (MCBOE) (see details on page 19):

- **Option 1 - Approval with Conditions**: The Board could approve renewal, but if so it should adopt strong accountability measures, such as a Memorandum of Understanding or Board-directed process, to address identified concerns. This would include directives to correct petition elements, align measurable outcomes with State Priorities in the LCAP, and promptly meet to establish alternative metrics suitable for the adult learner population served.
- **Option 2 - Denial**: The Board could deny renewal, but if so it must adopt written findings supporting the denial on the strongest basis, emphasizing academic and non-academic performance concerns that result in the legally required finding that closure of the school is in the best interest of its pupils. Additional grounds for denial include the petition's failure to fulfill the requirements of § 47605.6.

The Board is encouraged to weigh these findings carefully, prioritizing the best interests of current and prospective students while considering the school's role in serving an underserved adult population.

II. BACKGROUND

Come Back Charter School (CBCS) began serving students on September 6, 2018, and is applying for its first charter renewal. The current charter term (2018-2023) was extended through July 1, 2026, pursuant to Education Code (EC) § 47607.4. The lead petitioner seeking charter renewal from the Merced County Board of Education (MCBOE) is Sherre Vernon, Interim Principal at CBCS. The Renewal Petition, submitted on January 30, 2026, covers a proposed renewal charter term from July 1, 2026, through June 30, 2031.

CBCS is a non-classroom-based school both authorized and administered by the Merced County Office of Education (MCOE). The charter school serves approximately 128 students aged 18 and older. The school's office is located at 350 West Yosemite Ave. in Merced. CBCS utilizes additional resource centers (as specified in the submitted Petition) throughout the county to support the countywide program model.

Dashboard Alternative School Status (DASS) Renewals

EC § 52064.5(d) authorizes the California Department of Education to establish alternate methods for calculating and reporting the state and local indicators on the California School Dashboard for certain schools. These alternative methods apply to schools serving high-needs student populations, including DASS-eligible charter schools.

Charter Schools Serving Adult Students

California charter schools can receive apportionment for students aged 19 or older only if they are California residents, continuously enrolled in public school, and making satisfactory progress toward a high school diploma (EC § 47612). Effective July 1, 2015, EC § 47612.1 waived these requirements, excluding residency, for programs providing instruction in exclusive partnership with WIOA, YouthBuild, Job Corps, or California or Local Conservation Corps.

III. CHARTER RENEWAL LEGAL STANDARDS

Timeline

In compliance with EC § 47605.6(b), the MCBOE will hold a Public Hearing to consider the level of support for the Petition. EC § 47605.6(b) requires that the Board conduct a second public hearing to render its decision on the request within 90 days of receipt of a Petition that included a certification that the submission was complete, unless both parties agree to an extension. The authorizer is required to publish all staff

recommendations, including recommended findings, at least 15 days prior to the determination hearing.

DASS Renewals

EC §§ 47605.6, 47607, and 47607.2 mandate the analytical framework for charter renewal evaluations by authorizers.

For DASS charter schools, § 47607(c)(7) sets a separate academic standard: The school is exempt from the performance categories in § 47607.2. Instead, the authorizer shall consider the school's performance on state and local Dashboard indicators in addition to alternative metrics tailored to the pupil population served by the school. These alternative metrics must be mutually agreed upon during the first year of the charter term, with the authorizer notifying the school within 30 days.

All other criteria and requirements in §§ 47605.6 and 47607 continue to apply fully.

IV. RENEWAL ANALYSIS

Has the Charter School met performance requirements specified in EC §§ 47607?
Undetermined

Analysis of Alternate Metric Achievement Outcomes

As noted in the *Executive Summary*, the Merced County Office of Education (MCOE) did not establish or mutually agree with CBCS on Dashboard Alternative School Status (DASS)-aligned Alternate Metrics. As a result, the ability to fully evaluate the school's progress and overall effectiveness in alignment with the California Education Code is limited to publicly available state indicators and local charter outcomes as presented in the Petition.

Analysis of State Academic Performance Indicators

CAASPP ELA and Math Indicators

Come Back Charter School's state academic outcomes remain largely unreported on traditional California Dashboard measures because the school serves exclusively Grade 12 students, who are not required to take the CAASPP English-Language Arts (ELA) or Mathematics assessments. As a result, no Distance from Standard or state-level proficiency data are available across reported years, limiting the ability to evaluate longitudinal academic achievement using statewide indicators.

In local DASS comparisons, similar schools demonstrate very low levels of ELA and Math proficiency, though CBCS reports no comparable testing data.

College/Career Indicator (CCI)- 4/5-Year Cohort

The CCI provides a consistent measure of college career readiness and shows that 0% of CBCS students were prepared in all reported years, maintaining a Very Low/Red performance level across student groups. This pattern indicates persistent challenges in preparing students for postsecondary education, career pathways, or workforce readiness.

Percent Prepared

Source: *California Dashboard*

Student Groups	2019	2022	2023*	2024	2025
Schoolwide	0% No Color	No Data	0% Very Low	0% Red	0% Red
Socioeconomically Disadvantaged	0% No Color	No Data	0% Very Low	0% Red	0% Red
Hispanic	0% No Color	No Data	0% No Color	0% No Color	0% Red

No performance color is assigned when cohort group is <30.
**The 2023 Dashboard CCI indicator did not report colors to reflect growth/decline. It utilized status indicators (Very Low, Low, Medium, High, Very High).*

DASS School Comparison

Source: *California Dashboard*

Schools	2024	2025
CBCS	0% Red	0% Red
Valley Merced Community	0% Red	0% Red
Valley Atwater Academy	0% No Color	1.7% Red
Sequoia High Merced	No Data	No Data
Yosemite High Merced	0.6% Red	0.6% Red

No performance color is assigned when cohort group is <30.

Analysis of State Non-Academic Performance Outcomes

Taken together, non-academic indicators indicate that CBCS faces persistent challenges in student engagement, retention, and completion. While suspension rates are minimal,

likely reflecting the school's adult, non-classroom-based structure, the overall non-academic outcomes indicate that many students are not successfully progressing to graduation within expected timeframes, with low graduation rates, high dropout rates, and elevated chronic absenteeism affecting a significant portion of the student population.

Graduation Rates – 4/5 Year Cohort

Graduation rates at CBCS remain low relative to comparable DASS programs in most reported years, with performance levels frequently in the Very Low or Red categories. Rates show some fluctuation but no sustained improvement, highlighting ongoing difficulties in supporting students to complete high school within the expected timeframe. This pattern is particularly evident among key student groups, such as Socioeconomically Disadvantaged and Hispanic students, where available data show trends similar to or identical to the schoolwide rates.

Rates by Student Group

Source: *California Dashboard*

Student Groups	2019	2022*	2023	2024	2025
CBCS	20.4% No Color	39.5% Very Low	24.1% Red	47.6% Red	42.1% Red
Socioeconomically Disadvantaged	20.4% No Color	39.5% Very Low	24.1% Red	47.5% Red	42.7% Red
Hispanic	19.4% No Color	21.7% No Color	19.4% No Color	46.2% Red	38.6% Red

No performance color is assigned when the cohort group is <30.

*The 2022 Dashboard Graduation Rate indicator did not report colors to reflect growth/decline. It utilized status indicators (Very Low, Low, Medium, High, Very High)

CBCS has consistently underperformed most similarly situated DASS schools in recent years, while some comparison schools achieved Yellow or higher status in 2024-25 despite also facing challenges.

DASS School Comparison

Source: *California Dashboard*

Schools	2023	2024	2025
CBCS	24.1% Red	47.6% Red	42.1% Red

Valley Merced Community	64.1% Red	54.8% Red	72.2% Yellow
Valley Atwater Community	No Data	66.0% No Color	73.3% Yellow
Sequoia High Merced	No Data	No Data	No Data
Yosemite High Merced	76.9% Yellow	70.9% Red	68.6% Orange

No performance color is assigned when the cohort group is <30.

Dropouts – 4-Year Cohort

Dropout rates for CBCS are consistently high across reported years, far exceeding those of similar DASS schools. These elevated levels directly contribute to the low graduation rates and underscore significant barriers to student retention and completion.

DASS School Comparison

Source: *Data Quest Four-Year Adjusted Cohort Graduation Rate and Outcome Data*

Schools	2023	2024	2025
CBCS	**85.4%**	**68.8%**	**78.6%**
Valley Merced Community	37.8%	32.2%	30.6%
Valley Atwater Community	No Data	21.7%	27.6%
Sequoia High Merced	No Data	No Data	No Data
Yosemite High Merced	16.7%	25.3%	22.7%

No performance color is assigned when the cohort group is <30.

Suspension Rate

Suspension rates at CBCS are 0% across all reported years and student groups, earning consistent Blue performance levels. This reflects the school's unique adult, non-classroom-based instructional model, which minimizes traditional disciplinary incidents.

Rates by Student Group

Source: *California Dashboard*

Student Groups	2023	2024	2025
CBCS	0% Blue	0% Blue	0% Blue

Socioeconomically Disadvantaged	0% Blue	0% Blue	0% Blue
Hispanic	0% Blue	0% Blue	0% Blue
White	0% Blue	0% Blue	0% Blue

No performance color is assigned when the cohort group is <30.

Similar schools show more variability, with some experiencing higher rates (e.g., Sequoia High Merced in the Red range), while others remain low.

DASS School Comparison

Source: *California Dashboard*

Schools	2023	2024	2025
CBCS	0% Blue	0% Blue	0% Blue
Valley Merced Community	0% Blue	4% Orange	1.6% Green
Valley Atwater Community	0% No Color	0% No Color	0.9% Green
Sequoia High Merced	10.6% Red	8.1% Yellow	10.7% Red
Yosemite High Merced	4.5% Green	3.4% Green	3.1% Green

No performance color is assigned when the cohort group is <30.

Chronic Absenteeism (Grades TK-12)

Chronic absenteeism affects a substantial portion of the CBCS student population, though rates have declined from 2023 to 2025. Still, levels remain high schoolwide and across major student groups (Socioeconomically Disadvantaged and Hispanic), indicating ongoing challenges with student engagement and consistent participation.

Rates by Student Group

Source: *Data Quest Absenteeism Data*

Student Groups	2023	2024	2025
Schoolwide	59.5%	50.3%	41.1%
Socioeconomically Disadvantaged	59.5%	50.3%	42.1%

Hispanic	61.9%	54.8%	42.4%
White	65.6%	50.0%	40.0%

Analysis of Other Charter Outcomes

Based on locally reported charter outcomes included in the Petition, CBCS self-reported meeting targets for providing access to a broad course of study, maintaining sufficient instructional materials, and exceeding its attendance goal. However, supporting documentation was not provided in the Petition's Appendix to support these data claims. Several other key outcomes fell below established targets, including academic growth on STAR 360 (particularly in mathematics and among Students with Disabilities) and graduation rates. Similar to the four/five-year cohort (42.1%), the one-year DASS graduation rate is 41.3%, remaining below the charter's 50% target, with slightly lower outcomes for Hispanic students. This is atypical for a DASS school; the one-year graduation rate is frequently used as an alternative measure because its higher rate is viewed as a more accurate measure of success for a transient population. Additionally, no students were reported enrolled in community college or job training programs, and school climate measures showed modest declines. English Learner reclassification data appear to be misreported. According to DataQuest, the 2024-25 reclassification rate was 13.3%, up slightly from 11.7% the previous year, and on track to meet the school's established outcome of 15%.

Overall, while CBCS demonstrates strengths in maintaining a safe, stable, and supportive learning environment, the data indicates a continued need to strengthen academic progress and increase graduation and post-secondary readiness outcomes.

Metrics/ Sources	Target	Outcomes/Years
Access to a Broad Course of Study *Source: Tracked Locally*	2024-25 100%	2024-25 100%
EL Reclassification Rate *Source: DataQuest*	Adult EL's- 15% EL's 15%	2024-25 Adult EL's- 0% EL's- 7.7%
STAR 360 *Source: Tracked Locally*	**2024-25** **Reading SGP** All- 60% ELL- 75% Hispanic-60% SED- 60% SWD- 0% **Mathematics SGP** All- 50% ELL- 50% Hispanic- 50% SED- 50% SWD- 40%	**2024-25** **Reading SGP** All- 50% ELL- 78% Hispanic-53% SED- 44% SWD- 0% **Mathematics SGP** All- 36% ELL- 56% Hispanic- 34% SED- 31% SWD- 0%
# of Students Enrolled at Local Community College *Source: Tracked Locally*	10 Students	2024-25 0 Students
# of Students Enrolled in Job Training *Source: Tracked Locally*	10 Students	2024-25 0 Students
# of Advisory Board Meetings *Source: Tracked Locally*	3 Meetings	2024-25 2 Meetings
Sufficient Core Instructional Materials *Source: Tracked Locally/SARC*	100%	2024-25
Pupil Expulsion Rate *Source: DataQuest*	All Students- 0%SED- 0% Hispanic- 0%	All Students- 0% SED- 0% Hispanic- 0%
School Spring Climate Surveys % Strongly Agree or Agree *Source: Tracked Locally*	School Safety- 100% Support from School Staff- 95% Sense of Belonging- 90% Sense of Engagement- 80%	**2025-25** School Safety- 99% Support from School Staff- 92% Sense of Belonging- 86%

		Sense of Engagement- 70%
Graduation Rate- 1-Year DASS *Source: CA Dashboard Additional Reports*	All- 50% SED- 50% Hispanic- 50%	2024-25 All- 41.3% SED- 42.3% Hispanic-38.3%
Attendance Rate (P-2) *Source: CALPADS*	All- 85%	All- 86.3%

Are there serious governance or fiscal concerns that have been properly noticed by the authorizing board, AND has the Charter's corrective action plan been unsuccessful, or are the violations severe enough that the plan is unlikely to be viable? (EC § 47607(e))	
Date Board Approved Notice: N/A	**Date Notice Delivered:** N/A
No (governance only)	

Governance Review

CBCS operates as a county-sponsored, locally funded charter authorized by the MCBOE under EC § 47605.6. As a charter administered by the MCOE, CBCS does not have a separate nonprofit governing board, bylaws, articles of incorporation, or an independent conflict-of-interest code. Instead, the MCBOE serves as the governing body, retaining all statutory roles and responsibilities (EC §§ 1040-1047), while the County Superintendent oversees operations and employees. Governance, including policy adoption, Brown Act compliance, public meetings, and oversight, follows existing MCBOE procedures.

The absence of separate governance documents (e.g., standalone bylaws, nonprofit filings, or a school-specific board) is appropriate for a county-sponsored charter, where the authorizer's governing structure and policies govern the school.

Fiscal Review

The fiscal review is being conducted internally at MCOE. Any statements regarding the analysis will be provided as an addendum to this report.

Based on cumulative enrollment patterns, attrition rates (including mid-year and inter-year departures disaggregated by student groups), and associated academic performance data as required under Education Code § 47607(d), does the charter school appear to be serving all pupils who wish to attend?	
Date Board Approved Notice: N/A	**Date Notice Delivered:** N/A
Yes	

Demographic Data Analysis

Enrollment trends over the past five years indicate that CBCS continues to serve a predominantly high-needs student population consistent with California Dashboard Alternative School Status (DASS) eligibility. Total enrollment steadily increased from 75 students in 2020-21 to 128 students in 2024-25, while the proportion of socioeconomically disadvantaged students remained extremely high, ranging from 93.3% to 100%. English Learner enrollment showed an overall upward trend, rising from 4.0% to 10.2%, and the percentage of students experiencing homelessness increased in recent years, reaching 3.1% in 2024-25. Although Foster Youth and Migrant student populations remained small or absent, the school continues to enroll students with disabilities, increasing to 3.1% in the most recent year. Collectively, these patterns demonstrate the school's continued role in serving students facing significant socioeconomic and educational barriers (including poverty, language needs, housing instability, and academic risk factors typical of DASS-eligible populations) while remaining aligned with the mission and eligibility expectations of a DASS program and providing an essential alternative pathway toward graduation for students requiring flexible, non-traditional educational settings.

CBCS Student Group Enrollment Trends

Source: *DataQuest/ California Dashboard*

Student group	2020-21	2021-22	2022-23	2023-24	2024-25
English Learners	4.0%	6.5%	3.9%	8.3%	10.2%
Foster Youth	2.7%	0.0%	2.0%	0.0%	0.0%
Homeless Youth	0.0%	0.0%	1.0%	0.8%	3.1%

Migrant Education	0.0%	0.0%	0.0%	0.0%	0.0%
Students with Disabilities	1.3%	2.6%	1.0%	0.8%	3.1%
Socioeconomically Disadvantaged	100.0%	100.0%	100.0%	93.3%	96.1%
All Students	**75**	**77**	**102**	**120**	**128**

Complaints
MCOE indicated that no formal complaints have been filed against CBCS regarding this topic.

Does the Petition meet the standards and criteria described in Education Code § 47605.6, including but not limited to a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed?
Mostly

Certification of Completion
A signed *Certificate of Completion* dated January 30, 2026, was submitted with the Petition.

Required Assurances
The Petition contains the required assurances, except as expressly indicated in the petition elements that are not considered complete or comprehensive. See the *Complete and Comprehensive Petition* section below.

Material Revisions
CCAP did not identify any apparent material revisions; however, the original Petition required extensive updates to meet legal requirements resulting from the implementation of AB 1505, which was signed into law in 2019.

Complete and Comprehensive Petition
The CBCS renewal Petition is submitted as a countywide charter under EC § 47605.6, which should contain sixteen elements; however, the Petition is aligned with the fifteen

traditional charter petition requirements set forth in EC § 47605(c)(5). While the Petition addresses many requirements, they are in a slightly different order than as set forth in the Education Code.

Elements of the submission that are not complete and/or comprehensive include (as organized in the submission):

Element A (1): Educational Program
The description of the educational program is inadequate and lacks specificity. The Petition provides only broad, generalized statements and does not clearly explain how the non-classroom-based program is designed or implemented. It fails to describe the curriculum, instructional practices, assessments, or student progress benchmarks in any substantive way. The narrative is vague and assumes prior knowledge, limiting its effectiveness as a clear, comprehensive description. Annual goals and associated actions fail to account for the assessment, monitoring, and progress of Long-Term English Learners.

Element B (2): Measurable Student Outcomes
The measurable student outcomes do not include English Learner progress, which is a required metric. This metric must specifically address both the English Learner (EL) and Long-Term English Learner (LTEL) student groups, as applicable to the charter.

Element C (3): Student Progress Measurement
The description of student progress measurement does not include the English Language Proficiency Assessments for California (ELPAC), the California Science Test (CAST), and the California Alternate Assessments (CAA). In addition, the Petition does not identify or describe the local assessment(s) used by the charter, nor does it specify the frequency of administration or how assessment data are used to inform instruction and monitor student progress. The description also omits critical information regarding the charter's grading policy, course completion criteria, and how student progress toward course completion is measured and documented.

Element E (5): Employee Qualifications
The Petition could be strengthened by referencing specific MCOE Human Resources policies/procedures, by noting how CBSC and MCOE share responsibility for recruiting qualified staff, and by adding professional development expectations. At a minimum, the Petition should detail the respective shared responsibilities of the MCOE and the CBCS.

Element F (6): Health and Safety Procedures
The Petition complies with basic health and safety policy adoption, but lacks a summary of the EC § 32282 components, adaptations for the school's model, recent legislative additions, assurance of staff training, and confirmation of the annual update.

Given CBCS's model as an adult education program serving students aged 18+ in a non-classroom-based/independent study setting, certain physical or on-campus safety components (e.g., gang-related apparel prohibitions) are not applicable or are significantly limited in scope. However, EC § 47605(c)(5)(F) still requires a reasonably comprehensive description of the procedures the charter school will follow to ensure the health and safety of pupils and staff, including the development and annual review (by March 1) of a Comprehensive School Safety Plan (CSSP).

The submitted Petition does not provide an explicit summary or description of the required components. While it lists numerous policies covering relevant topics (e.g., child abuse reporting under Policy 5141.4), it does not incorporate specific safety plan requirements or explain why certain requirements are adapted and/or minimized in the non-classroom-based adult education context.

To fully comply with § 47605(c)(5)(F) and related sections, Element F must include, at a minimum:

- A brief summary of how the safety plan addresses each required topic under § 32282(a)(2), or an explanation of adaptations for the non-classroom-based adult model where components are not applicable.
- Explicit reference to recent legislative additions, such as procedures for responding to sudden cardiac arrest or similar life-threatening medical emergencies (per AB 2887, effective for plans reviewed on/after July 1, 2025).
- Confirmation of annual updates by March 1, staff training on the plan, and inclusion of the full or redacted Comprehensive School Safety Plan in the petition appendix.
- An explicit assurance that all CBSC staff will receive training on the Comprehensive School Safety Plan (including its procedures and roles).

The current level of omission, particularly the lack of explicit summaries of § 32282 components and recent additions, could serve as grounds for denial. Under SB 98 (Chapter 124, Statutes of 2025), effective immediately on September 20, 2025, due to an urgency clause, chartering authorities are explicitly authorized to deny a petition if the safety plan description is not reasonably comprehensive. This includes failure to address

required procedures (e.g., immigration enforcement notifications added to § 32282), which must be incorporated into plans by the next update or no later than March 1, 2026.

Element H (8): Admissions Policies and Procedures
The description of CBCS's admissions policies and procedures is missing required components:

- An assurance that the charter school will not encourage disenrollment/transfer of a student from the charter school, for any reason, including but not limited to academic performance or any characteristics of the student listed under EC § 47605.6(e)(2)(B)(iii); and
- Assurance that enrollment preferences will not require mandatory parent volunteer hours as a criterion for admission or continued enrollment.

Element J (10): Suspension and Expulsion Procedures
The description aligns with the mission for adult learners (flexible, individualized support); however, it lacks explicit detail on tiered interventions (e.g., Tier 1 universal supports, Tier 2/3 targeted/intensive), specific alternatives to suspension, community/partner involvement in developing procedures, or student/family engagement in the discipline process (beyond notice).

The Petition does not include an explicit enumerated list of mandatory vs. discretionary offenses. Rather, it relies on the Education Code, MCOE references, and Appendix G.

The Petition explicitly acknowledges that students can be expelled, but it provides no explicit process for notifying the superintendent of the expelled student's last known district of residence within 30 days or for forwarding cumulative records (transcripts, grades, health records) to that district. Statutory requirements apply regardless of adult charter status.

Element L (12): Public School Attendance Alternatives
This element omits a description of procedures/strategies for informing prospective students of these attendance alternatives, including, at a minimum:

- Communication methods (e.g., enrollment packets, website, orientation sessions, counseling, or written notices).

- Plans for providing information in languages students understand (e.g., translation for non-English speakers, per EC § 48980 or related requirements).
- Any outreach or notification during the application/enrollment process.

While the adult student population (18+) means many may act as their own decision-makers (reducing the need for parent-focused communication), the rubric still requires a description of how alternatives are communicated to prospective enrollees.

Element M (13): Rights of District Employees

As a county-sponsored charter school authorized and administered by MCOE, CBCS is staffed by employees who are classified as MCOE employees. This structure means employee rights related to leave, transfer, return, and collective bargaining are governed by existing policies, collective bargaining agreements and applicable Education Code provisions. However, the Petition does not include, at a minimum, a clear description of the relationship between the MBCOE and CBCS regarding the following:

- Explicitly addressing whether staff may resume employment within the MCOE in a manner that preserves seniority, tenure, or placement rights (e.g., no mention of bumping rights, rehire priority, or mandatory reinstatement).
- The ability to transfer sick/vacation leave to and from the charter and another LEA.
- Whether staff continue to earn service credit (tenure) in the district/authorizer while employed at the Charter.

The language is limited to the right to apply for open positions per the *Collective Bargaining Agreement*, which is compliant but not comprehensive.

Element N (14): Dispute Resolution Procedures

CBCS operates under MCOE's governance and policy framework. Employees are MCOE employees, and many operational procedures, including dispute resolution, are governed by existing MCOE or MCBOE policies rather than separate charter-specific documents.

However, the Petition does not describe any process for resolving internal complaints or disputes (e.g., among staff, between staff and administration, parent/student complaints unrelated to authorizer issues, or Uniform Complaint Procedures). There is no mention of, at a minimum:

- Internal grievance procedures.

- Uniform Complaint Procedures (UCP) under EC § 35160 et seq. and 5 CCR § 4600 et seq.
- How UCP or other internal processes are communicated to parents, staff, and the community (e.g., via handbook, website, or annual notices).

While MCOE policies likely include internal complaint mechanisms, the Petition does not reference or describe them.

Additionally, the Petition does not include any assurance or statement that: "Except for disputes between the chartering authority and the charter school, all disputes involving the charter school shall be resolved by the charter school according to the charter school's internal policies." This is a standard required assurance to clarify that internal disputes (e.g., staff grievances, parent complaints) are handled in accordance with the school's procedures, while authorizer-charter disputes follow MCOE policy.

There is no statement or assurance that: "If any such dispute concerns facts or circumstances that may be cause for revocation of the charter, the authorizer shall not be obligated by the terms of the dispute resolution process as a precondition to revocation." This is a critical statutory protection (commonly referenced in EC § 47607 revocation processes) that ensures serious violations can lead to revocation without first exhausting a dispute process.

Miscellaneous Provisions: Impact Statement (Enrollment)
The Petition does not include a direct statement of the number of students CBCS intends to enroll in the next term, nor does it address the impact of continued low Average Daily Attendance (ADA). Appendix B provides detailed enrollment and ADA projections for the renewal term; however, Appendix submissions alone do not constitute a comprehensive petition:

- 2025-26: 135 students / 105 ADA
- 2026-27: 140 students / 110 ADA
- 2027-28: 145 students / 115 ADA

To be comprehensive in its description, the Petition body should contain an explicit summary or statement of intended annual enrollment numbers. Additionally, the Petition should incorporate an acknowledgement of low ADA and mitigation strategies to ensure its solvency.

V. RENEWAL FINDINGS OF FACT

In determining whether to grant a charter renewal for a DASS-eligible charter school, the authorizer shall consider, in addition to the charter school's performance on the state and local indicators included in the California Dashboard, the charter school's performance on metrics applicable to the charter school based on the pupil population served. The authorizer may deny a charter renewal for a DASS charter school only upon making written findings, setting forth specific facts to support one or more of the following findings:

- Closure of the charter school is in the best interest of pupils.
- The school is demonstrably unlikely to successfully implement the program set forth in the petition due to substantial fiscal or governance factors, or is not serving all pupils who wish to attend pursuant to requirements outlined in EC § 47607 subdivisions (d) and (e).
- The submitted petition does not adhere to the standards and criteria described in § 47605.6 and may be denied under subdivision (c), except paragraphs (7) and (8).

CCAP provides two options to support the MCBOE in its determination whether to approve or to deny CBCS's renewal Petition.

Option 1

Should the Board **approve** the CBCS Petition for renewal, written findings of fact need not be adopted, but it is strongly recommended that identified deficiencies be explicitly addressed through a Memorandum of Understanding or other board-directed internal process to include, but not be limited to:

1. An explicit directive with an established timeline to:

    a. Correct missing or incomplete charter petition elements as outlined above.
    b. Address with sufficient detail in Element A the instructional strategies, interventions, or changes likely to improve the described academic and non-academic outcomes.
    c. Align Element B with the State Priorities and LCAP process. Include goals, actions, metrics, and outcomes in Element B that address identified academic and non-academic concerns. Ensure metrics are valid, verifiable, and include data sources.

Additionally, it is recommended that the MCBOE direct MCOE's designated charter school contact to meet with CBCS within 60 days of approval to discuss alternative metrics appropriate to the school's DASS population, with written notification of the approved metrics to the school within 30 days following the meeting, consistent with the requirement in EC § 47607(c)(7). As previously noted in the *Executive Summary, the* statute requires the two to meet within the first year of the charter term.

Approval under these conditions would allow continued operation while establishing accountability toward meeting statutory and performance expectations.

Option 2

Should the Board **deny** the CBCS request for renewal, the Board must make written findings specific to support the denial based on at least one of the following:

1. Closure of the charter school is in the best interest of pupils, with greater weight being applied to academic performance measurements.
2. The school is demonstrably unlikely to successfully implement the program set forth in the petition due to substantial fiscal or governance factors or is not serving all pupils who wish to attend pursuant to requirements outlined in EC § 47607 subdivisions (d) and (e).
3. The submitted petition does not adhere to the standards and criteria described in § 47605.6 and may be denied under subdivision (c), except paragraphs (7) and (8).

In this event, it is strongly recommended that the Board adopt the following findings:

1. **Closure of the charter school is in the best interest of pupils, with greater weight being applied to academic performance measurements.**
   The written petition and outcome data do not indicate that the school's current or proposed educational program is likely to improve student outcomes. This determination is informed by, but not limited to, the following:

   Academic Indicators

   The College/Career Indicator reported for CBCS over the past three academic years reflects that 0% of graduates met the state-defined criteria for preparedness for postsecondary education or career pathways.
   - The educational program as described in the renewal petition does not include sufficient detail regarding instructional strategies, interventions, or

programmatic changes that would reasonably be expected to result in improved student proficiency outcomes in Reading and Mathematics.
- Results from local assessments (STAR 360) indicate that fewer than 50% of enrolled students met their annual academic growth targets.

Non-Academic Indicators

- CBCS faces persistent challenges related to student engagement, retention, and completion that would lead them to successful progress towards graduation within expected timeframes.
- Graduation rates, including the DASS 1-Year Graduation Rate, are low overall and relative to comparable DASS programs; dropout rates are consistently high, and chronic absenteeism continues to affect a significant portion of the student population.

2. **The school is demonstrably unlikely to successfully implement the program set forth in the petition due to substantial fiscal or governance factors, or is not serving all pupils who wish to attend pursuant to requirements outlined in EC § 47607 subdivisions (d) and (e).**
   There are no findings determined as part of this review; however, MCOE staff may provide additional information for consideration in any internal fiscal review.

3. **The submitted petition does not adhere to the standards and criteria described in EC § 47605.6 and may be denied under subdivision (c), except paragraphs (7) and (8).**
   The CBCS renewal petition, submitted as a countywide charter pursuant to EC § 47605.6, contains several material deficiencies that prevent full compliance with the requirement for reasonably comprehensive descriptions of all required charter elements, including but not limited to the detailed findings outlined on pages 10-15 of the report.

Fund 04 - Come Back Charter School Multi-Year Projection

	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28
BEGINNING BALANCE	**$933,835**	**$1,176,057**	**$785,403**	**$630,120**
Enrollment	128.00	*135.00*	*140.00*	*145.00*
ADA	104.74	*105.00*	*110.00*	*115.00*
%	*81.83%*	*77.78%*	*78.57%*	*79.31%*
A. REVENUES				
8010-8099 LCFF/RL Sources	1,765,538	1,788,504	1,939,643	2,101,707
8100-8299 Federal Revenues	25,857	427,339	6,149	6,149
8300-8599 Other State Rev	196,210	279,642	204,879	206,848
8600-8799 Other Local Rev	22,463	31,500	31,500	31,500
8980-8999 Contributions	(22,500)	-	-	-
TOTAL REVENUES (excluded BB)	$1,987,568	$2,526,985	$2,182,171	$2,346,204
B. EXPENDITURES				
1000-1999 Certificated Salaries	802,550	999,380	1,009,367	1,019,453
2000-2999 Classified Salaries	189,682	189,598	191,494	193,409
3000-3999 Employee Benefits	401,568	495,457	490,269	487,248
4000-4999 Books & Supplies	31,336	466,890	173,389	171,426
5000-5999 Serv & Other Oper	118,299	431,805	181,258	185,373
5760 M&O	49,241	51,704	51,704	51,704
5899 1% oversight fee	17,655	17,885	19,396	21,017
6000-6999 Capital Outlay	-	50,000	50,000	50,000
7000-7999 Indirect/Other Outgo	135,015	214,921	170,577	170,601
TOTAL EXPENDITURES	1,745,345	2,917,640	2,337,454	2,350,231
ENDING FUND BALANCE (BB+REV-E	**$1,176,057**	**$785,403**	**$630,120**	**$626,093**

Assumptions

Indirect 24-25 8.15%. Subsequent years are 8.18%

Salary and benefit increases based on
2025 CSEA settlement as follows 24-25
4.5%, 25-26 3% and 26-27 1%. 27-28
1% per MCOE Business Services.
Supplies and services are adjusted each year by CPI per the SSC Dartboard
Captial Outlay added in out years for the potential facility needs based on growth
CSI funds not guaranteed in the out years
Supplies, services and indirect decrease in 26-27 and 27-28 as some one-time restricted funding ends

— MERCED COUNTY —
Office of Education

Steve M. Tietjen, Ed.D. | County Superintendent of Schools

632 WEST 13TH STREET | MERCED, CA 95341 | (209) 381-6600 | WWW.MCOE.ORG

March 4, 2026

TO: Board of Education
From: Martin Fregoso, Deputy Superintendent
RE: Come Back Charter School Financial Analysis

The Business Services department has examined the financial condition and enrollment trends for the Come Back Charter School (CBCS). Our analysis indicates that CBCS will be able to meet its financial obligations over the next three years and most likely into the future.

CBCS has a healthy reserve balance of approximately 27%. In addition, ADA and enrollment trends have been stable and are expected to remain stable for the foreseeable future.

For reference, I have attached the three (3) year Multi-Year Projection for CBCS.