

Staff Report on Request for Material Revision to Griffin Academy High School Charter Petition

Posted July 28, 2026

INTRODUCTION

Griffin Academy High School (GAHS) is an independent charter school authorized by the Vallejo City Unified School District (VCUSD or District). GAHS serves students in grades 9-12 and is currently operating under a five-year charter term that expires on June 30, 2031.

On May 1, 2026, the District received a written request from Griffin Technology Academies (GTA), its charter management organization, to materially revise GAHS's charter (Request). GTA proposes to consolidate Griffin Academy Middle School (GAMS), another independent charter school authorized by the District, with GAHS to create a single, comprehensive charter school that would serve students in grades 6-12. If approved by VCUSD's Board of Education, GTA would thereafter close GAMS, add grades 6-8 to GAHS, and change the name of GAHS to "Griffin Academy."

On June 17, 2026, the VCUSD Board held a public hearing during its regularly-scheduled meeting to determine the level of support for the Request from District teachers, other District employees, and parents/guardians.

The purpose of this report is to provide detailed information for the Board to assist with its determination of whether to approve or deny the material revision request.

LEGAL REQUIREMENTS FOR MATERIAL REVISIONS

Material revisions are governed by the standards and criteria set forth in Education Code section 47605 and must be approved by the VCUSD Board. A request for a material revision must also include, but is not limited to, a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or law renewed. (Educ. Code 47607) On July 9, 2026, the California Governor signed Assembly Bill 126 (i.e., the K-12 education omnibus trailer bill) into law, which included key legislative changes impacting charter schools. Of significance here, is that SB 126 amended Education Code section 47607 to now provide the following: "Notwithstanding any other law, and beginning on July 1, 2026, standards and criteria include timelines, deadlines, and other procedures referenced in subdivision (b) of Section 47605 or subdivision (b) of Section 47605.6, as applicable." While the District had chosen, prior to the enactment of SB 126, to follow the same procedures and timelines applicable to initial petitions for purposes of this Request, this amendment now makes such procedures and timelines statutorily required under Education Code section 47607(b).

Education Code section 47605(a)(4) identifies two instances in which material revisions are mandatory: (1) if the charter school proposes to expand operations to one or more sites not identified in its approved charter, or (2) if the charter school proposes to expand operations to one or more grade levels not identified in its approved

charter. In addition, a charter authorizer may, in its discretion, determine what types of changes are substantive, or material, and would constitute a material revision to a charter. Here, given that GTA seeks to expand GAHS to add grades 6-8, the requirements applicable to material revisions under Education Code section 47605(a)(4) and 47607(b) must be followed.

A material revision request may be denied on the basis of written factual findings supporting one or more of the following:

1. The charter school presents an unsound educational program for the pupils to be enrolled in the charter school.
2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
3. The petition does not contain an affirmation of each of the conditions required by statute.
4. The petition does not contain a reasonably comprehensive description of all the required elements.
5. The petition does not contain a declaration of whether the charter school shall be deemed the exclusive public school employer of the employees of the charter school for purposes of the Educational Employment Relations Act (EERA).
6. The charter school, if materially revised, is demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate. Analysis of this finding shall include consideration of the fiscal impact of the proposed material revision to the charter school. A written factual finding under this paragraph shall detail specific facts and circumstances that analyze and consider the following factors:
 - (A) The extent to which the proposed material revision would substantially undermine existing services, academic offerings, or programmatic offerings.
 - (B) Whether the proposed material revision would duplicate a program currently offered within the school district and the existing program has sufficient capacity for the pupils proposed to be served within reasonable proximity to where the charter school intends to locate.
7. The school district is not positioned to absorb the fiscal impact of the proposed material revision. A school district satisfies this paragraph if it has a qualified interim certification pursuant to Section 42131 and the county superintendent of schools, in consultation with the County Office Fiscal Crisis and Management Assistance Team, certifies that approving the charter school would result in the school district having a negative interim certification pursuant to Section 42131, has a negative interim certification pursuant to Section 42131, or is under state receivership. Charter schools proposed in a school district satisfying one of these conditions shall be subject to a rebuttable presumption of denial.

This report provides a summary and analysis of GTA's Request and includes the District review team's findings of fact addressing the legal criteria detailed above. The District review team has decided not to make a formal recommendation to approve or deny the Request but instead provides the information below for the VCUSD Board to make an informed decision. This report, however, identifies the options available to the VCUSD Board concerning the Request. As explained below, the Board has the option to: (1) approve the Request to add grades 6-8 to GAHS and change its name to "Griffin Academy," (2) deny the Request, which would result in GAHS

continuing to serve grades 9-12 only and GAMS continuing to serve grades 6-8, or (3) approve the Request with any conditions set by the Board.

EXECUTIVE SUMMARY

Below is an executive summary of the District review team's findings regarding the Request.

Does the proposed materially-revised charter petition demonstrate legal grounds for <u>denial</u> ?		See specific findings.
1.	Does the charter present a sound educational program?	See below.
2.	Are petitioners demonstrably unlikely to successfully implement the program set forth in the petition?	See below.
3.	Does the petition contain an affirmation of each of the required conditions?	Criterion met
4.	Does the petition contain reasonably comprehensive descriptions of all required elements described below?	Generally met, but see findings below.
5.	Does the petition contain a declaration of whether the charter school shall be deemed the exclusive public employer of the charter school's employees?	Criterion met
6.	Is the charter school demonstrably unlikely to serve the interests of the entire community in which the charter school is proposing to locate?	See below.
7.	Is the school district not in a position to absorb the fiscal impact of the proposed material revision?	No.

REQUIRED ELEMENTS OF THE PETITION			
No.	Element / Category	Reasonably Comprehensive?	Comments
1	Description of Educational Program	Partially Met	See findings below.
2	Measurable Student Outcomes	Yes	
3	Methods for Measuring Student Progress	Yes	
4	Governance Structure	Yes	
5	Employee Qualifications	Yes	
6	Health and Safety Procedures	Yes	
7	Balance of Students from Different Student Groups	Yes	
8	Admissions & Lottery Procedures	Yes	
9	Annual Independent Financial Audits	Yes	
10	Student Discipline Procedures	Yes	
11	Retirement Systems	Yes	
12	Public School Attendance Alternatives	Yes	
13	Post-Employment Rights of Employees	Yes	
14	Dispute Resolution Procedures	Yes	
15	Closure Procedures	Yes	

FINDINGS OF FACT

Finding #1: Soundness of Educational Program.

Because the Request seeks to consolidate GAMS and GAHS to form a single charter school serving grades 6-12, the District review team analyzed the academic achievement and performance of each charter school both on a schoolwide basis and based on significant student groups since this also bears on the soundness of their respective educational programs.

GAMS has been designated as a middle-performing charter school by the California Department of Education (CDE) based on its performance on the California School Dashboard (Dashboard). However, GAMS' achievement levels reflected on the 2025 Dashboard are currently low. GAMS maintains a middle-performing status due to its 2024 results in which it was designated in the "Yellow" performance tier for both Mathematics (Math) and English Language Arts (ELA). As displayed in the following charts, achievement declined in both Math and ELA in 2025. If the achievement levels have not significantly increased when the results of the 2026 accountability testing are released, GAMS could be in jeopardy of being classified as a low-performing charter school, with a presumptive non-renewal of its charter (which is set to expire on June 30, 2027).

GAMS 2024 Results

Academic Achievement		
English Language Arts	Mathematics	English Learner Progress
		
Yellow	Yellow	No Performance Color
41.8 points below standard	87.2 points below standard	30.8% making progress
Increased 21.9 Points	Increased 3.7 Points	Declined 44.2%
Academic Engagement	Conditions and Climate	Informational Purposes

Academic Achievement		
Chronic Absenteeism  Orange 28% chronically absent Declined 2%	Suspension Rate  Green 6.4% suspended at least one day Declined 8.7%	Science  No Performance Color in 2024 7.3 points below standard Increased 9.6 Points

GAMS 2025 Results

Academic Achievement		
English Language Arts  Orange 66.7 points below standard Declined 24.9 Points	Mathematics  Red 100.6 points below standard Declined 13.4 Points	English Learner Progress  No Performance Color 63.6% making progress Increased 32.9%

Academic Engagement	Conditions and Climate	Informational Purposes
Chronic Absenteeism  Red 32.2% chronically absent Increased 4.2%	Suspension Rate  Red 13.5% suspended at least 1 day Increased 7.1%	Science  No Performance Color 43.6 science points Declined 9.7 Points

The charts above show across-the-board declines on all academic indicators, with the only reported student group–socioeconomically disadvantaged students–exhibiting notable declines in ELA (75.1 points below standard, with a decline of 29.1 points) and in Math (105.7 points below standard, with a decline of 9.7 points). In addition, GAMS’ chronic absenteeism rate, which was already high at 32.2%, increased by another 4.2%. The suspension rate also jumped to 13.5%, reflecting an alarming increase in suspensions of 7.1%. These results placed GAMS in the lowest category of “Red” on all indicators, except for ELA in which it received an “Orange” designation.

Given GAMS’ poor performance on the Dashboard for 2025, the District review team recommends that the VCUSD Board carefully consider whether it would be prudent to approve GTA’s Request to consolidate the two charter schools. The review team notes that GTA is specifically asking to consolidate GAMS *into* GAHS, which would result in the closure of GAMS. Comparatively, as reflected in the charts in Finding #2 below which show the academic performance and achievement of GAHS, GAMS’ performance is much lower and it is at risk of a presumptive non-renewal if it does not show significant improvement when the 2026 Dashboard results are released. Thus, by authorizing the material revision, this would insulate GAMS from a potential non-renewal of its charter because GAMS would merge into GAHS. Therefore, the VCUSD Board should consider the soundness of the GAMS educational program and whether the charter school is effectively addressing the educational needs of its student population in light of these poor academic and other outcomes. Further, if GAMS students enroll in the consolidated charter school should the Request be approved, the Board should consider whether this consolidation could restrict or limit the District’s ability to evaluate the academic outcomes for students in grades 6-8. Unless assessment information is obtained, evaluated, and reported by grade level and student groups in a manner that would allow the District, as the charter authorizer responsible for oversight, to effectively and meaningfully analyze student performance for the middle school program, the review team is concerned that such consolidation could effectively mask the problem and drive down GAHS’s future Dashboard scores and performance.

Further, while GTA states that its intent for the consolidation is to streamline processes, enhance operational efficiency, reduce administrative burden, and “ensure a coherent and aligned instructional program across grade levels” that it believes to be essential to student success. GTA also expressed that this unified grades 6-12 model would enable “intentional vertical articulation of curriculum, instruction, and assessment practices, creating a seamless educational experience that supports continuous academic growth.” The review team appreciates GTA’s desired goals for this proposed consolidation effort; however, it is not convinced that the approval of the Request would effectuate this desired outcome since GTA has not shown a real nexus addressing *how* the desired outcome of the consolidation would effectuate improved student academic performance and achievement among students both schoolwide and its students groups in the middle school grades.

The review team also notes that, currently, GAMS and GAHS operate their respective educational programs on the same school site, and they also share an administrator, an academic advisor, and a site administrator. GAMS and GAHS, however, operate on different bell schedules. GTA proposes that alignment of the two schools’ bell schedules will allow for more student engagement, targeted support, extended instructional blocks, dedicated intervention periods, and expanded enrichment opportunities. According to GTA, this will, in turn, allow for “more strategic time during the school day, ensuring that students receive timely, responsive support while also engaging in deeper, more meaningful learning experiences.” However, it is the District review team’s understanding that the bell schedule has been the same in previous years, and actions such as those proposed in the Request could have been implemented. Therefore, it remains unclear whether the proposed unification of the charter school into a 6-12 program would result in the desired outcomes espoused by GTA.

For the above reasons, VCUSD should carefully evaluate whether the proposed consolidation detailed in the Request promotes a sound educational program for students in grades 6-12. At a minimum, the District review team believes that GTA should be held accountable for GAMS’ poor achievement and performance outcomes in ELA and Math, chronic absenteeism rate, suspension rate, and other outcomes reflected on the Dashboard.

Finding #2: Likelihood of Successful Implementation of the Charter School Program.

The District review team has evaluated whether the proposed consolidation of GAMS and GAHS could be successfully implemented and presents its findings for the Board’s consideration below.

As reflected in its renewal petition that was approved by the VCUSD Board for a five-year term of July 1, 2026 through June 30, 2031, GAHS projects the following enrollment for grades 9-12:

Grade	2026-27	2027-28	2028-29	2029-30	2030-31
9 th	50	60	70	75	80
10 th	51	60	64	73	78
11 th	46	51	59	63	71
12 th	42	41	46	53	57

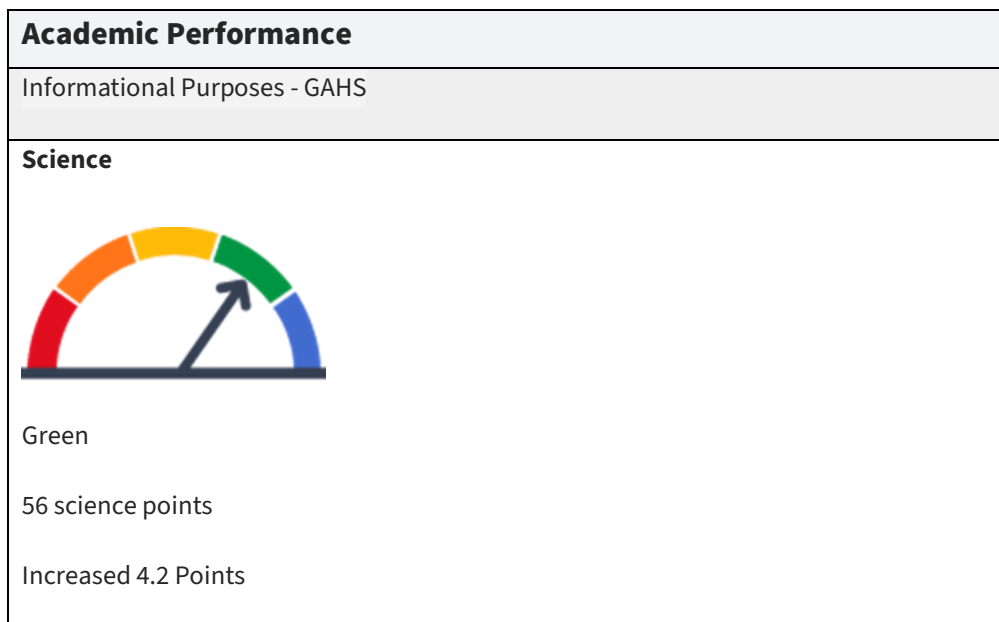
If its Request is approved, the combined school (Griffin Academy), would serve students in grades 6-12. GTA's updated projections for grades 6-12 are displayed below.

Grade	2026-27	2027-28	2028-29	2029-30	2030-31
6 th	35	35	40	40	40
7 th	44	52	57	57	60
8 th	65	50	57	57	60
9 th	50	60	70	75	80
10 th	51	60	64	73	78
11 th	46	51	59	63	71
12 th	42	41	46	53	57
Total	330	351	376	400	407
Additional:	144	137	149	153	156

Based on the information available, the District review team does not have specific concerns with the enrollment projections given that they represent a combination of GAMS' and GAHS' projections, respectively. However, it is important to note that if GAMS closes, the students enrolled in that charter school would not automatically transfer to the consolidated Griffin Academy. Rather, the parents/guardians of those students would be required to newly enroll in Griffin Academy. Thus, consideration should be given to the possibility that parents/guardians may choose not to enroll their students in Griffin Academy, which would result in impacts to the above enrollment projections (and budget).

GAHS is designated as a middle-performing charter school by CDE based on its performance on the 2025 Dashboard. GAHS' most recent California Dashboard results are as follows:

Academic Performance	
English Language Arts  Blue 38.7 points above standard Increased 26.8 Points	Mathematics  Yellow 76.1 points below standard Increased 32.2 Points
English Learner Progress  No Performance Color 38.5% making progress Declined 11.5%	College/Career  Orange Prepared 18.8%
Academic Engagement - GAHS	Conditions and Climate - GAHS
Graduation Rate  Orange 85.5% graduated Declined 1.7%	Suspension Rate  Red 11.4% suspended at least one day Increased 4.7%



GAHS showed commendable improvements in ELA and Math, as reflected on the 2025 Dashboard in which it was placed in the “Blue” category for ELA (38.7 points above the standard, with an increase of 26.8 points) and in the “Yellow” category for Math (76.1 points below the standard, with an increase of 32.2 points). GAHS also improved on the Science indicator with 56 points (an increase of 4.2 points). However, GAHS declined by 11.5% on the English Learner Progress indicator, and declined by 1.7% on the graduation rate. Additionally, GAHS’ score on the College and Career Readiness indicator showed only 18.8% as being prepared, and GAHS’ suspension rate grew to 11.4% (an increase of 4.7%) resulting in its designation in the “Red” category. Therefore, while GAHS is showing promising results on the academic indicators, the District review team questions whether a consolidation of the two schools could further exacerbate concerns regarding the overall school climate and ability to engage students in active learning due to the poor performance on these other Dashboard indicators.

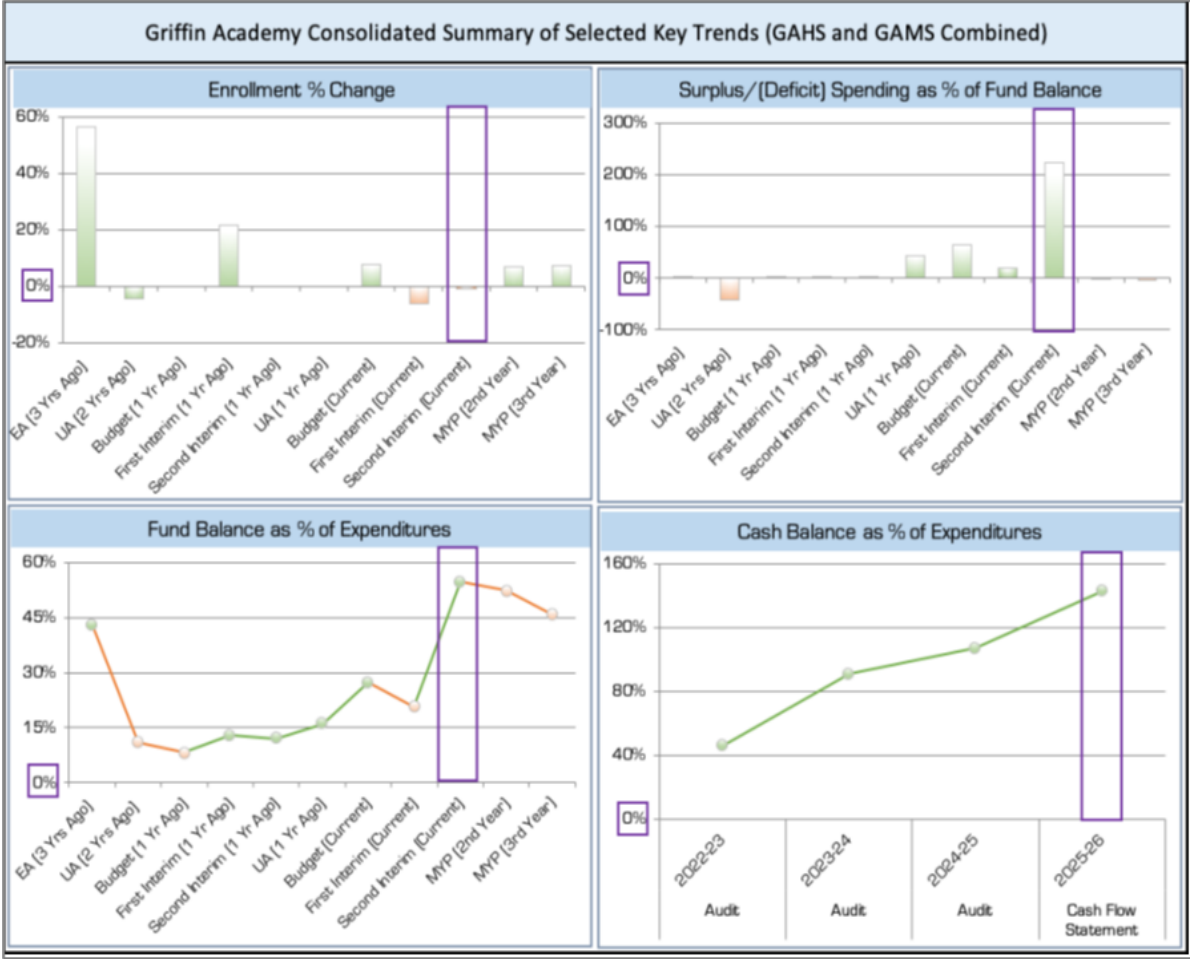
As detailed above, GAMS’ academic results for 2025 are poor. The only reason that GAMS was able to maintain a middle-performing designation is due to its academic performance reflected on the 2024 Dashboard. The review team notes that the academic results for the 2023 school year were also poor. Any gains made in 2024 were negated by the performance declines in 2025. Again, unless GAMS improves its performance on the state indicators for 2026, GAMS’ designation will drop to low performing with a presumptive non-renewal for the July 1, 2027 renewal date.

In light of the above-noted concerns with GAMS’ and GAHS’ respective scores on the Dashboard, the District review team questions the fidelity of combining the two schools without first demonstrating *individually* that they can successfully operate an effective educational program for students that fosters student engagement, a positive school climate, and improved academic outcomes schoolwide.

From a fiscal standpoint, the proposed Griffin Academy would consolidate the financial statements of both GAHS and GAMS. Viewed on a consolidated basis, Griffin Academy’s fiscal condition continues to appear healthy. Enrollment was flat in the current year but grew in prior years, and GTA anticipates modest growth going forward.

According to the Griffin Academy Consolidated Summary of Selected Key Trends (GAHS and GAMS combined) depicted below, they collectively had a budget surplus last year, and GTA estimates an even larger budget surplus in the current year. This is largely attributable to the recent receipt of one-time funds associated with the District’s Measure S bond by both schools. Fund balances and cash balances have generally been rising, again much improved in the current year with Measure S, and both fund and cash balances currently sit at healthy levels.

A graphical illustration summarizing these trends as of Second Interim is displayed as follows.



The District review team also finds it relevant to share that any consolidation effort would require an extensive review of all of the written agreements between and among the District and GTA to the extent that they reference GAHS and GAMS as separate independent charter schools. This could also require the District to commit *extensive* time and resources by staff and legal counsel to prepare and negotiate any necessary amendments to those agreements to reflect a change from the two distinct charter schools to a single, combined “Griffin Academy.” If GTA were to not agree to the proposed amendments, this could result in interpretation or enforcement issues due to the outdated terminology (i.e., reference to what would become a closed charter school and the formation of consolidated charter school under the new name of “Griffin Academy”) and provisions in the existing agreements prohibiting the assignment of the rights and responsibilities of the parties. Surprisingly, GTA did not address this consideration in its Request or in the cover letter supporting its Request. Nor did GTA propose specific

amendments to the existing agreements reflecting this change in structure to reduce the amount of administrative time and effort that would be required if the VCUSD Board approved its Request. This lack of foresight causes the District review team to question statements made by GTA that the approval of the Request would actually reduce the District's administrative burden in overseeing the two Griffin charter schools when, in fact, the approval of the Request could actually increase those responsibilities (i.e., overseeing all of the closure-related actions for GAMS and amending written agreements between the parties to account for the closure and restructuring of the charter schools).

For the above reasons, the District review team finds that there are grounds supporting the determination that GTA is demonstrably unlikely to successfully implement the proposed consolidated grade 6-12 charter school program. However, this determination ultimately rests with the VCUSD Board.

Finding #3: Affirmation of Required Conditions.

No findings.

Finding #4: Reasonably Comprehensive Descriptions of Required Elements.

The materially-revised petition, as presented, generally includes reasonably comprehensive descriptions of the required elements except as noted below.

Description of Educational Program

The District's review team observed that the materially-revised version of the petition includes a new educational curriculum for both middle and high school students. GTA proposes to adopt Grades 6-8 EL Education (Expeditionary Learning) from Open Up Resources as curriculum for the middle school's ELA program, and GTA proposes to adopt the Odell Education English Language Arts curriculum, also from Open Up Resources, for the high school's ELA program. The description of the adopted curriculum does not describe Expeditionary Learning or address how GTA or Griffin Academy would provide professional development on how to deliver the instruction or how the curriculum would combine knowledge and skills-based content through cross-subject learning expeditions—the intent of Expeditionary Learning. The updated petition also includes new curriculum in the areas of Science and History/Social Science, both disciplines adding new texts from Open Up Resources, with no mention of their compatibility or interfacing abilities with the ELA curriculum.

Additionally, adopting EL Education for grades 6-8 and Odell Education for grades 9-12 constitutes a major systemic shift. Amplify relies on a digital, blended learning loop with game-like quests and integrated online platforms, whereas EL utilizes collaborative, physical module-based “learning expeditions” rooted in interdisciplinary projects and Odell is structured around linear, text-dependent units focused on developmental and applied civic/academic literacy. Changing to this program updates how high school student progress and mastery is measured. These differences appear to alter the instructional design of the approved charter and could represent a material change in and of itself. If this is the case, the District review team finds that additional information regarding this new curriculum and how it is integrated into the overall instructional design is needed to consider this proposed change.

It should also be noted that the dependent charter school authorized by VCUSD uses an Expeditionary Learning K-8 model. The Expeditionary Learning component for Griffin Academy for grades 6-8 offers nothing new to the community. If the original intent of charter schools was to create publicly funded laboratories of innovation, this program may now duplicate an innovative program already in existence within the district.

Notably, the District review team observed that the curriculum outlined in both proposed material revision requests for Mare Island Technology Academy (MITA) and GAHS are the same, which lends to the likelihood of further duplication of programs. The District review team expects GTA to address why it intends to implement the same curriculum across the two sets of consolidated schools if the Request and the material revision request for MITA are approved by the VCUSD Board.

Finding #5: Declaration of Public School Employer.

No findings.

Finding #6: Demonstrably Unlikely to Serve the Entire Community in Which the Charter School Proposes to Locate.

No findings, except that the District review team notes that the Request for GAHS and the material revision request for MITA propose the same curriculum as well as the Expeditionary Learning model which is already implemented by the District's dependent charter school. This calls into question whether the GTA charter schools would serve the interests of the community in which they are located given that this learning model is already being implemented at another school in the District that is located in relatively close proximity to the GTA charter schools.

Finding#7: Fiscal impact.

No findings.

VCUSD BOARD OPTIONS

The District review team has presented the above proposed findings for the VCUSD Board's consideration. The following options are available to the Board in its consideration and action on the Request to materially revise GAHS's charter:

1. Approve the Request which would authorize GTA to close Griffin Academy Middle School and expand the grade-level offerings of Griffin Academy High School to include grades 6-8, thus creating a grades 6-12 charter school. The name of the school would change to "Griffin Academy."
2. Deny the Request, which would result in no changes to the current structures of Griffin Academy Middle School or Griffin Academy High School. The denial would be final and **not** be subject to appeal to the Solano County Board of Education or State Board of Education.
3. Approve the Request with any conditions agreed upon by the Board (e.g., amendments to all written agreements to reflect closure of GAMS and consolidation of schools, etc.).

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