

**WESTERN PLACER UNIFIED SCHOOL DISTRICT
STAFF REPORT AND RECOMMENDED FINDINGS OF FACT
REGARDING THE CHARTER RENEWAL PETITION
OF JOHN ADAMS ACADEMY - LINCOLN CHARTER SCHOOL**

October 2, 2026

Pursuant to Education Code section 47605, subdivision (b), this staff report provides proposed recommended findings to the Western Placer Unified School District (“District”) Board of Education (“Board”) regarding the renewal petition (“Renewal Petition”) of the John Adams Academy - Lincoln (“JAA Lincoln”). The Findings below support renewal of JAA Lincoln as a high performing charter school and Staff recommends a seven (7) year renewal term.

I. BACKGROUND

On July 17, 2026, JAA Lincoln submitted its Renewal Petition to the District, providing a revision on August 31, 2026.

JAA Lincoln was initially authorized by the District to begin operations in 2017. The District renewed JAA Lincoln for a five (5)-year term from July 1, 2019, to June 30, 2024, which was extended by statute, through June 30, 2027, pursuant to Assembly Bill (“AB”) 130 and Senate Bill (“SB”) 114. JAA Lincoln seeks a further, seven (7) year renewal.

JAA Lincoln is a directly funded, independent public charter school operated by John Adams Academies Inc., a California nonprofit public benefit corporation with tax-exempt status under the Internal Revenue Code section 501(c)(3). John Adams Academies, Inc. operates three (3) charter schools: John Adams Academy – Roseville, JAA Lincoln, and John Adams Academy – El Dorado Hills.

JAA Lincoln serves transitional kindergarten (“TK”) through twelfth grade students from five (5) counties including El Dorado, Placer, Sacramento, Sutter, and Yuba. During the 2024-2025 school year, JAA Lincoln enrolled one thousand three hundred ninety-two (1,392) students. JAA Lincoln’s student population is comprised of certain subcategories of students, including socio-economically disadvantaged students (23.6%), English learners (5%), and foster and homeless youth (0.2%), as reflected on the California School Dashboard (“Dashboard”).

JAA Lincoln operates a classroom-based program for TK through eighth grade students, along with an independent study option for TK through twelfth grade students. The Renewal Petition states that it is preparing future leaders and statesmen through principle-based education centered on classics and great mentors. Scholars enjoy a classical liberal arts curriculum encompassing history, English, math, visual and performing arts, laboratory science, foreign language, and college preparatory electives. JAA Lincoln’s educational program and curriculum align with state standards. The high school program emphasizes college and career readiness, including “A” to “G” courses.

In 2019, JAA Lincoln expanded from a kindergarten through eighth grade school to serve TK through twelfth grade in both the classroom-based and independent study settings, meeting the

statutory requirements to be categorized as a classroom-based charter school for the purposes of funding. In March 2026, JAA’s governing board (“Governing Board”) voted for JAA Lincoln to limit offerings to grades ninth through twelfth through a structured online independent study program, while remaining compliant with applicable classroom-based charter school requirements and its Renewal Petition. JAA Lincoln is accredited by Cognia through 2032.

II. RENEWAL CRITERIA

Renewal petitions are governed by the standards and criteria described in Education Code section 47605 applicable to new petitions, as well as the criteria set forth in Education Code section 47607 and 47607.2. (Ed. Code, § 47605, subd. (c); Ed. Code, §§ 47607, 47607.2.)

A. General Renewal Criteria

Renewal petitions shall include a reasonably comprehensive description of any new requirements for charter schools enacted into law after the charter was originally granted or last renewed. (*Id.*) The Board may not deny a renewal petition unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the following:

1. The charter school presents an unsound educational program for the students to be enrolled in the charter school. (Ed. Code, §§ 47605, subd. (c)(1); 47607, subds. (a)(3), (b).)

The District has considered the educational program described in the Renewal Petition and JAA Lincoln’s Dashboard data and finds that JAA Lincoln presents a sound educational program. The District notes that JAA Lincoln has experienced credentialing misassignments in the past, which could impact its ability to implement a sound educational program. The District understands these misassignments have been resolved, and JAA Lincoln has made affirmations in the Renewal Petition that the issues will not recur. Beginning this year and during any renewal term, JAA Lincoln has committed to meeting with the District to review current assignments prior to census day and after the California Statewide Assignment Accountability System (“CalSAAS”) exception reports are generated. The District identified no other potential bases for a finding of an unsound educational program.

2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition. (Ed. Code, §§ 47605, subd. (c)(2); 47607, subds. (a)(3), (b).)

JAA Lincoln has operated since approximately 2017 and has successfully implemented the program set forth in the Renewal Petition. Based upon its review of the Renewal Petition and its exhibits, including the budget information provided, JAA Lincoln is likely to continue to successfully implement its program.

3. The petition does not contain an affirmation of each of the conditions described in Education Code section 47605, subdivision (e). (Ed. Code, § 47605, subd. (c)(4).)

As revised and resubmitted on August 31, 2026, JAA Lincoln's Renewal Petition provides all affirmations required by Education Code section 47605, subdivision (c)(4) and Education Code section 47605, subdivision (e)(6).

4. The petition does not contain a reasonably comprehensive description of certain elements in its program and operations as set forth in Education Code section 47605, subdivision (c)(5)(A)-(N), including any new requirements for charter schools enacted into law after the charter was originally granted or last renewed. (Ed. Code, §§ 47605, subd. (c)(5); 47607, subds. (a)(3), (b).)

As discussed below, JAA Lincoln's Renewal Petition contains reasonably comprehensive descriptions of all elements required by the Charter School Act, including new requirements for charter schools enacted into law after the charter was last renewed.

5. The school district is not positioned to absorb the fiscal impact of the proposed charter school. (Ed. Code, § 47605, subd. (c)(8).) 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. (*Id.*)

The District is positioned to absorb the fiscal impact of the JAA Lincoln charter renewal.

6. The petition does not contain 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 Chapter 10.7 (commencing with section 3540) of Division 4 of Title 1 of the Government Code. (Ed. Code, § 47605, subd. (c)(6).)

The Renewal Petition contains a statement that it shall be deemed the exclusive public school employer of the employees of JAA Lincoln for purposes of the Educational Employment Relations Act.

7. The charter school is demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate. (Ed. Code, § 47605, subd. (c)(7).)

As discussed below, JAA Lincoln has shown that it will serve the interests of the entire community in which the school is proposing to locate as set forth in the Renewal Petition.

B. Dashboard Performance Criteria

A chartering authority shall not deny renewal of a charter school if either of the following apply for two (2) consecutive years immediately preceding the renewal decision:

1. The charter school has received the two (2) highest performance levels (green or blue) on all Dashboard state indicators for which it receives performance levels; or
2. For all measures of academic performance, the charter school has received performance levels schoolwide that are the same or higher than the state average and, for a majority of subgroups performing statewide below the state average in each respective year, received performance levels that are higher than the state average.

(Ed. Code, § 47607, subd. (c)(2)(A).)

A charter school need only satisfy one (1) of the above to qualify as a “high-performing” charter school.

The California Department of Education (“CDE”) has designated JAA Lincoln as a “high-performing” charter school pursuant to Education Code section 47607, subdivision (c)(2)(A). The District conducted its own analysis and notes CDE’s designation does not account for certain pupil subgroups for which there are insufficient pupil subgroup performance level data at JAA Lincoln; acknowledging this discrepancy, the District defers to CDE’s designation of JAA Lincoln as *high-performing*, addressing this matter in more detail under Finding 8.

C. Non-Renewal Criteria

In addition, pursuant to Education Code section 47607, subdivision (e), irrespective of the performance criteria, a chartering authority may deny renewal of a charter school if:

1. The charter school is demonstrably unlikely to successfully implement the program set forth in the petition due to substantial fiscal or governance factors; or
2. The charter school is not serving the pupils who wish to attend, as documented by aggregate data reflecting pupil enrollment patterns at the charter school.

To deny a charter school pursuant to these bases, the chartering authority must provide the charter school with notice of, and reasonable opportunity to cure, these concerns. (Ed. Code, § 47607, subd. (e).)

In review of the Renewal Petition, the District has not identified either of these circumstances, and thus, there is not a finding that would support denial of the renewal based on section 47607(e).

III. ANALYSIS AND PROPOSED FINDINGS

Finding 1: The Renewal Petition presents a sufficiently sound educational program for the pupils to be enrolled in the charter school.

For purposes of Education Code section 47605, a charter petition is “consistent with sound educational practice” if it is likely to be of educational benefit to pupils who attend. (5 C.C.R. § 11967.5.1.)

JAA Lincoln’s curriculum is based on the American Classical Leadership Education model which emphasizes core academic subjects, classical literature, historical understanding, and moral development. The curriculum offers an alternative approach to education by fostering a culture of mentoring, high expectations, classical learning, and servant leadership. A secondary curriculum centers on economics and is intended to create engaged citizens who have a solid understanding of the beliefs of the founders about the proper role of government and the impact of debt on nations and individual citizens.

The elementary program primarily focuses on language acquisition. The middle school program embodies the second phase of classical education, the logic stage, in which students study the rules of logic and apply logic to all academic subjects. The high school program is centered on the rhetoric stage, meaning students learn and practice self-expression. Each stage is supplemented with instructional materials and state standards aligned textbooks to ensure that every student learns the Common Core State Standards. Students graduating from JAA Lincoln complete a minimum of two hundred forty (240)-unit credits and Capstone Requirements including a thesis, speech, and project. JAA Lincoln supports its in-person high school scholars with “A” to “G” accredited online courses should they supplement their instruction with additional courses, such as a language not offered or credit recovery. Students are also provided a range of extended learning programs and enrichments such as academic supports, intramural sports, and league-sanctioned athletics.

JAA Lincoln consolidated its in-person high school program with the Roseville campus, but continues to serve ninth through twelfth grades, through a structured fully online instructional program that remains compliant with applicable classroom-based charter school requirements and its Renewal Petition. JAA Lincoln was re-accredited by Cognia through 2032. High school courses are generally transferable to other educational institutions. Students and parents/guardians are informed about the transferability of courses and counseled about the eligibility of courses to meet college entrance requirements.

Professional Learning Communities (“PLCs”) meet weekly and are used to review formative, interim, and summative assessment results, identify trends, and adjust Tier I core instruction as appropriate for students. Academic growth is monitored by tools such as CAASPP, English Language Proficiency Assessments for California (“ELPAC”), i-Ready, Northwest Evaluation Association Measures of Academic Progress Growth, Lexia, and classroom-based assessments to ensure alignment with California State Standards.

JAA Lincoln serves English Learner scholars, including Long-Term English Learners (“LTEL”) or English Learners at risk of becoming LTEL, through its Board-adopted English Master Plan and implementation of English Language Development (“ELD”) Standards, the California English Learner Roadmap, and the English language arts/ELD Framework into its classroom instruction. The ELD program follows the Structured English Immersion model which delivers nearly all instruction in English using targeted language development and sheltered teaching strategies to ensure English Learners can access grade-level content while rapidly developing English proficiency. The ELD program is delivered in a combination of integrated and designed ELD instruction formats. The integrated format is delivered throughout the day as teachers intentionally embed language objectives within content objectives using text and materials. Designed ELD instruction is delivered in small-group pull-out instruction and strategic push-in support.

Academically low achieving students are provided with a Multi-Tiered System of Supports (“MTSS”) to provide systematic and escalating academic and language development support for all scholars, including English Learners, scholars with disabilities, and other diverse learners. Students identified as at-risk are also supported with Scholar Success Teams which develop a targeted support plan and review the plan every six (6) to eight (8) weeks.

Academically high achieving students are offered additional opportunities to extend their learning including differentiated assignments, independent or small-group enrichment projects, and increased complexity in texts, problem-solving tasks, or Socratic discussions. Students may be offered structured opportunities for mentorship, leadership roles within the classroom, or project-based learning experiences that allow for deeper inquiry. Students may also be provided supplemental curriculum resources, online extension activities, or more challenging course content aligned to their demonstrated readiness.

For the purposes of special education, JAA Lincoln is a member of the El Dorado County Charter Special Education Local Plan Area (“SELPA”). JAA Lincoln affirms that it will continue to comply with all applicable laws, policies, and procedures and represents itself at SELPA meetings.

Implementation of a sound educational program requires employment of appropriately credentialed teachers. The District notes, during the prior charter term, there were instances of credentialing issues, including misassignments and credentialing gaps. Specifically, the most recent CalSAAS exception report identified sixteen (16) teachers generate exceptions. This included exceptions for:

- A teacher having their substitute permit expire on October 1, 2021, with their credential not posted until December 13, 2024;
- A teacher only taught one (1) subject in a class tagged as a core class which in effect disqualifies it as a core setting;
- A teacher’s credential expired from October 1, 2024, to February 18, 2025; and
- A teacher with no English Learner authorization.

JAA Lincoln has resolved these issues and provided affirmations in the Renewal Petition that teachers will be properly credentialed and assigned moving forward. This includes compliance with recent amendments to Education Code section 44258.9, subdivision (n), effective July 1, 2027, which require an assigned teacher offering a course for credit or that counts towards instructional minutes, to hold a certificate, permit, or other document required by the commission for that assignment, and said teacher shall be monitored. This change in law does not permit the charter school to assign a teacher of record who is not an employee of the charter school. The District has also committed its support to meeting with JAA Lincoln to review current assignments prior to census day and after CalSAAS exception reports are generated; therefore, the District does not identify this as an outstanding concern at this time. Based on these commitments, the District finds that prior credentialing concerns do not present a barrier to JAA Lincoln delivering an educationally sound educational program moving forward.

Finding 2: The Charter School is likely to successfully implement the program set forth in the Renewal Petition.

To successfully implement the program described in the Renewal Petition, Petitioners must demonstrate they are familiar with the content of the Renewal Petition and the requirements of laws applicable to the proposed school, present a realistic financial and operational plan, and have the necessary background in areas critical to the charter school's success, or have a plan for securing the services of individuals with the necessary background, including curriculum, instruction, assessment, finance, and business management.

The District has reviewed the Renewal Petition and observed the operations of JAA Lincoln during the past charter term. JAA Lincoln has demonstrated overall success in its implementation of its educational program, including notable increases in its English Learner Progress and Mathematics performance levels, according to the Dashboard. The District notes decreases in certain areas of the Dashboard based on 2024 reporting data, including JAA Lincoln's Chronic Absenteeism, English Language Arts, and Suspension Rate, which should be an area of focus for JAA Lincoln moving forward.

JAA Lincoln is an independent charter school operated under the oversight and governance of the District. JAA Lincoln's nonprofit Governing Board ensures effective operations of the Charter School and acts in an advisory capacity. Based on the District's observations, the Governing Board fulfills its advisory role in supporting the leadership and operations of JAA Lincoln. Further, as an independent charter school authorized by the District, JAA Lincoln maintains a good working relationship with the District.

The Renewal Petition also demonstrates staff's necessary background in areas critical to the charter school's success as well as provides the Board Policy on the staffing and hiring plan with the general intent to continue to secure appropriate staff. (Petitioner's Revised Renewal Petition ["Pet.'s Revised Renewal Petition"] at 93-97; Appendix L.)

With respect to JAA Lincoln's financial condition, the District notes the 2024-2025 school year audit report indicated significant deficiencies with closing books. JAA Lincoln has remedied these issues by engaging third-party support to work with site leadership to develop budgets and

provide budget reports. California Education Code section 47605, subdivision (h), requires a petitioning charter school to provide financial statements including a proposed first-year operational budget, including startup costs, cash flow, and financial projections for the first three years of operation. (See also 5 C.C.R. § 11967.5.1(c)(3)(B).) During its financial review, the District worked with JAA Lincoln to reconcile certain questions related to cash flow and accounting. All questions from District staff regarding financial information have been addressed by JAA Lincoln to the District's satisfaction.

With the foregoing in mind, the District also notes the following:

- The projected three (3)-year budget exceeds the three percent (3%) reserve requirement.
- Certain object codes in the budget did not clearly identify the budgeted amounts for items such as insurance, professional consulting services, and other operating expenditures identified in the Renewal Petition.
- JAA Lincoln's monthly projection of revenue receipts are not aligned with local/state/federal funding cycles as each revenue line is spread evenly at one-twelfth of the annual amount which is not consistent with the state apportionment calendar. Expenditures are likewise straight-lined at one-twelfth of annual amounts, rather than a cash schedule. While each month shows a positive fund balance, this is based on the straight-line method referred to previously, but the working capital cushion is substantial and therefore, a negative month is unlikely even after re-timing.
- The five (5)-year projection (fiscal years 2027 to 2031) are based on aspirational average daily attendance. Specifically, these projections are based on projected average daily attendance ("ADA") of 95.8%. The District notes the three (3)-year average for ADA is 93.4% and the more conservative average is a more appropriate budgeting metric. In performing its analysis, the District considered this adjustment and finds, when this metric is applied, that JAA Lincoln still maintains a positive position and healthy reserve as set forth in the following table:

	2026-27	2027-28	2028-29	2029-30	2030-31
Beginning fund balance	\$3,910,593	\$3,606,715	\$3,359,539	\$3,398,274	\$3,434,209
Net income as projected	\$86,431	\$170,702	\$484,905	\$497,419	\$605,365
Change in LCFF funding (line 62)	(\$390,309)	(\$417,878)	(\$446,170)	(\$461,484)	(\$485,404)
Adjusted net income (deficit)	(\$303,878)	(\$247,176)	\$38,735	\$35,935	\$119,961
Ending fund balance	\$3,606,715	\$3,359,539	\$3,398,274	\$3,434,209	\$3,554,170
Ending balance as % of total expenditures	18.6%	16.4%	15.9%	15.5%	15.4%
Months of operating expenditures	2.2 mo	2.0 mo	1.9 mo	1.9 mo	1.8 mo

Taking the foregoing factors into consideration collectively, the District finds that JAA Lincoln will continue to successfully implement the program set forth in its Renewal Petition.

Finding 3: The Renewal Petition contains an affirmation of each of the conditions described in Education Code section 47605, subdivision (e).

Based upon the revised Renewal Petition, all required affirmations set forth in Education Code section 47605, subdivision (e), are included

Finding 4: The Renewal Petition contains a reasonably comprehensive description of the specific elements described in Education Code section 47605, subdivisions (c)(5)(A)-(N), as applicable, including any new requirements for charter schools enacted into law after the charter was originally granted or last renewed.

The Renewal Petition contains reasonably comprehensive descriptions of elements set forth in Education Code section 47605, subdivisions (c)(5)(A)-(N), as set forth below.

A. Educational Program

Education Code section 47605, subdivision (c)(5)(A), requires a reasonably comprehensive description of the educational program of the charter school designed, among other things, to identify those whom the charter school is attempting to educate, what it means to be an “educated person” in the twenty-first (21st) century, and how learning best occurs. The goals identified in that program shall include the objective of enabling pupils to become self-motivated, competent, and lifelong learners. Further, it must describe the annual goals for the charter school for all pupils and for each subgroup of pupils identified pursuant to section 52052, to be achieved in the state priorities, as described in subdivision (d) of section 52060, that apply for the grade levels served, or the nature of the program operated, by the charter school, and specific annual actions to achieve those goals. A charter petition may identify additional school priorities, the goals for the school priorities, and the specific annual actions to achieve those goals.

If the proposed charter school will serve high school pupils, a description of the manner in which the charter school will inform parents about the transferability of courses to other public high schools and the eligibility of courses to meet college entrance requirements. Courses offered by the charter school that were previously accredited by the Western Association of Schools and Colleges and are now accredited by Cognia may be considered transferable and courses approved by the University of California or the California State University as creditable under the “A” to “G” admissions criteria may be considered to meet college entrance requirements.

For the reasons summarized in Finding 1, above, the Petition provides a reasonable comprehensive description of its program, how its program supports various subgroups, and proper accreditation meeting the requirements of law.

The District notes that certain metrics for measuring goals could be more explicitly addressed through the Charter School’s policy and practice. For example, in goal number one (1), which in part addresses teacher credentialing, the only metric provided for appropriately assigned and credentialed teachers, is “Teacher Retention Rate”, which does not directly address or measure the quality or assignment of teachers retained by the JAA Lincoln. (Pet.’s Revised Renewal Petition, Appendix K at 16.) However, the goal does include action 1.1, which describes procedures in place to ensure quality teachers are hired and retained, and action 1.2, which describes the use of PLCs as supports for professional development. (*Id.* at 18-20.)

With respect to standards-aligned instructional materials, also addressed in goal number one (1), an explicit metric is not provided for how this will be measured besides academic progress.

However, JAA Lincoln does state its intent to provide students with access to standards-aligned course materials through site administration developing/refining curriculum maps, instructional guides, and assessments to support scholars in meeting or exceeding specified learning targets during PLCs. (*Id.* at 20.)

Finally, goal number three (3) reports to target state priority number three (3), parental involvement and family engagement, and the Renewal Petition indicates that JAA Lincoln will continue its practice of one-on-one orientations with families, use of Parent Square, teacher conferences, family information night, parent information night, “JUNTO” nights, and additional two-way communication opportunities. (*Id.* at 29-30.) However, the Renewal Petition does not identify an explicit metric to measure the progress of family engagement.

While the above-mentioned state priorities are likely implemented as described in the provided actions, the District encourages JAA Lincoln to identify metrics to track the actual progress made in these areas. Notwithstanding these notes, the Renewal Petition provides comprehensive description of the educational program, including alignment to the goals.

B. Measurable Pupil Outcomes

Education Code section 47605, subdivision (c)(5)(B), requires the Renewal Petition to identify the measurable pupil outcomes identified for use by the charter school. “Pupil outcomes,” for purposes of this part, means the extent to which all pupils of the charter school demonstrate that they have attained the skills, knowledge, and attitudes specified as goals in the charter school’s educational program. Pupil outcomes shall include outcomes that address increases in pupil academic achievement both schoolwide and for all pupil subgroups served by the charter school, as that term is defined in subdivision (a) of section 52052. The pupil outcomes shall align with the state priorities, as described in subdivision (d) of section 52060, that apply for the grade levels served by the charter school.

The Renewal Petition provides a comprehensive description of measurable pupil outcomes including utilization of required state assessments such as CAASPP, the California Science Test, the ELPAC, and the Physical Fitness Test.

C. Methods of Measurement and Other Uses of Data

Education Code section 47605, subdivision (c)(5)(C), requires the Renewal Petition to provide a reasonably comprehensive description of the method by which pupil progress in meeting those pupil outcomes is to be measured. To the extent practicable, the method for measuring pupil outcomes for state priorities shall be consistent with the way information is reported on a school accountability report card.

The Renewal Petition provides a comprehensive description of methods of measurement and other use of data by describing assessment methodology and philosophy, assessment design, mandated assessments, internal assessments, data management and analysis, and use of data. These descriptions are aligned to the JAA Lincoln educational program and the Local Control and Accountability Plan, and information about the assessments is included in the School

Accountability Report Card.

D. Governance Structure

Education Code section 47605, subdivision (c)(5)(D), requires a reasonably comprehensive description of the governance structure of the charter school, including, but not limited to the process to be followed by the charter school to ensure parental involvement. The Renewal Petition provides a reasonably comprehensive description of JAA Lincoln's governance structure, including operation by a nonprofit, conduct of Board meetings, and opportunities for parental involvement including Parent Service Organization, various committees, and volunteer opportunities.

E. Employee Qualifications

Education Code section 47605, subdivision (c)(5)(E), requires the Renewal Petition to include a reasonably comprehensive description of the qualifications to be met by individuals to be employed by the charter school. The Renewal Petition includes a reasonably comprehensive description of qualifications of employees including the Superintendent, Principal, Academic Dean, and Teachers, supported by a Staffing Plan, Personnel Policies and Evaluation Procedures.

The District finds the Renewal Petition meets this requirement by, among other things, providing a general statement that teachers will possess a valid teaching credential, permit, pre-intern or intern credential, or other Commission on Teacher Credentialing document required for their certificated assignment, as required by Education Code section 47605, subdivision (I). The District notes the Renewal Petition does not provide a specific list of teachers and their credentials or acknowledge the new requirements for TK teachers, pursuant to Education Code section 48000. The District expects JAA Lincoln will continue to seek support from the District to avoid any misassignment or credentialing issues experienced during the term of the last charter. Based on JAA Lincoln's affirmations that applicable credentialing requirements are being adhered to and the District's plan to schedule an annual meeting early fall with JAA Lincoln to review current assignments prior to census day as well as meet after CalSAAS exception reports are generated, the District does not identify this as an outstanding concern at this time.

F. Health and Safety

Education Code section 47605, subdivision (c)(5)(F), requires the Renewal Petition to include the procedures that the charter school will follow to ensure the health and safety of pupils and staff. The Renewal Petition provides a reasonably comprehensive description of the procedures it will follow to ensure the health and safety of pupils and staffing, including a "summary of the health and safety policies"; however, all policies were not provided in the appendices of the Renewal Petition and so the District notes the following items for JAA Lincoln to ensure are included.

- The Renewal Petition does not address notification of parents and guardians of pupils, teachers, administrators, and school personnel when the school confirms the presence of

immigration enforcement on the school site. (Ed. Code, §§ 32282 and 234.7.) This requirement was to be added to Health and Safety Plans by no later than March 1, 2026. (*Id.*) SB 98 authorizes a chartering authority to deny a charter school's petition if its proposed development of a school safety plan does not include procedures for notifying parents and school staff when immigration enforcement is confirmed on its school site.

- Pursuant to Education Code section 49428.2, subdivision (b), before January 31, 2026, governing boards or bodies of local educational agencies were required to adopt a policy on referral protocols for addressing pupil behavioral health concerns in grades seventh to twelfth. It is unclear if JAA Lincoln's health and safety policy incorporates this requirement as it is not explicit on the "summary of the health and safety policies" provided nor is a comprehensive health and safety policy attached as an appendix.

G. Racial and Ethnic Balance

Education Code section 47605, subdivision (c)(5)(G), requires the Renewal Petition to provide 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, as defined by the evaluation rubrics in section 52064.5, that is reflective of the general population residing within the territorial jurisdiction of the school district to which the charter petition is submitted.

The Renewal Petition provides a reasonably comprehensive description of this factor, including: an enrollment process that is scheduled and adopted at least ninety (90) days prior to open enrollment with an open-enrollment window of at least thirty (30) days to allow for a broad-based recruiting and application process; the development of promotional and informational material that appeals to all of the various demographic groups represented in the District; major marketing materials may be translated as appropriate into the language for the specific targeted ethnic group or activity; and scholar recruitment efforts that may include, but are not limited to, direct mail, print advertising, and informational meetings directed toward targeted scholar populations to recruit scholars from the various racial and ethnic groups represented in the District.

H. Admissions Requirements

Education Code section 47605, subdivision (c)(5)(H), requires the Renewal Petition to provide a reasonably comprehensive description of admission policies and procedures, consistent with subdivision (e) [of Education Code section 47605]. The Renewal Petition provides this reasonably comprehensive description detailing how it maintains admission policies that are fully compliant with California Education Code sections 47605, subdivision (c)(5)(H), and 47605, subdivision (e), ensuring equal access to all students and the fair administration of its enrollment process.

I. Suspensions/Expulsions

Education Code section 47605, subdivision (c)(5)(I), requires the Renewal Petition to include a reasonably comprehensive description of procedures by which pupils can be suspended or

expelled from the charter school for disciplinary reasons or otherwise involuntarily removed from the charter school for any reason.

The Renewal Petition includes a reasonably comprehensive description of suspension and expulsion procedures as well as a clear statement regarding notice of involuntary removals. The Renewal Petition also affirms that a “foster child’s educational rights holder, attorney, and county social worker and an Indian child’s tribal social worker and, if applicable, county social worker shall have the same rights a parent or guardian of a scholar has to receive a suspension notice, expulsion notice, manifestation determination notice, involuntary transfer notice, and other documents and related information.” (Pet.’s Revised Renewal Petition at 125-127, 137.)

J. Qualifications of Individuals to be Employed by the Charter School

Education Code section 47605, subdivision (c)(5)(J), requires the Renewal Petition to include a reasonably comprehensive description of “[t]he manner by which staff members of the charter schools will be covered by the State Teachers’ Retirement System, the Public Employees’ Retirement System, or federal social security.”

The Renewal Petition provides a reasonably comprehensive description of how all employees of JAA Lincoln will participate in the federal Social Security system. The Renewal Petition also provides that teachers and eligible classified employees will be provided access to a 403(b) retirement plan consistent with the employee benefit policies established and adopted by the Board of Trustees. (Pet.’s Revised Renewal Petition at 137.) The Renewal Petition also includes a description of responsibilities of implementation and administration of the retirement programs.

K. Public School Attendance Alternatives

Education Code section 47605, subdivision (c)(5)(K), requires the Renewal Petition to include a reasonably comprehensive description of the public school attendance alternatives for pupils residing within the school district who choose not to attend charter schools.

The Renewal Petition provides a reasonably comprehensive description explaining that no student will be required to attend JAA Lincoln and may attend the District or another school district or school within the District through the District’s intra- and inter-district policies. (Pet.’s Revised Renewal Petition at 138.) Additionally, the Renewal Petition clarifies that students enrolled in JAA Lincoln will be notified they do not have a right to admission in a particular school of a local educational agency, except to the extent that such a right is extended by the local education agency. (*Id.*)

L. District Employees’ Rights to Work

Education Code section 47605, subdivision (c)(5)(L), requires the Renewal Petition to include a reasonably comprehensive description of the rights of an employee of the school district upon leaving the employment of the school district to work in a charter school, and of any rights of return to the school district after employment at a charter school.

The Renewal Petition provides a reasonably comprehensive description of the rights of employees leaving the District to work at the charter school and the rights of return to the District after employment at the charter school. Specifically, the Renewal Petition states that JAA Lincoln will treat employees of the District who resign from District employment to work at JAA Lincoln and who later wish to return to the District the same as any other former District employee seeking reemployment. The Renewal Petition also clarifies that any sick or vacation leave or years of service credit at the District or any other school will not be transferred to JAA Lincoln. (Pet.'s Revised Renewal Petition at 139.)

M. Dispute Resolution of Charter Provisions

Education Code section 47605, subdivision (c)(5)(M), requires the Renewal Petition to include a reasonably comprehensive description of the procedures to be followed by the charter school and the chartering authority to resolve disputes relating to provisions of the charter.

The Renewal Petition provides a reasonably comprehensive description of the dispute resolution process to be followed in the event of a dispute arising between the District and JAA Lincoln (individually "Party", and collectively the "Parties") regarding the misinterpretation, misapplication, or violation of the Charter. This dispute resolution process provides that the Parties are to meet and confer within fifteen (15) working days of the written request of either Party. If the dispute is not resolved, then a committee shall convene within thirty (30) days, or as otherwise agreed to, to resolve the dispute. If the parties are unable to resolve the dispute within fourteen (14) days, or a time period otherwise agreed to, the parties shall submit the dispute to mediation. (Pet.'s Revised Renewal Petition at 140-141.)

N. Procedures in Event of Charter School Closure

Education Code section 47605, subdivision (c)(5)(N), requires the Renewal Petition to include a reasonably comprehensive description of the procedures to be used if the charter school closes. The procedures shall ensure a final audit of the charter school to determine the disposition of all assets and liabilities of the charter school, including plans for disposing of any net assets and for the maintenance and transfer of pupil records.

The Renewal Petition provides this reasonably comprehensive description detailing how JAA Lincoln will prepare final financial records and have an independent audit within six (6) months after closure. The Renewal Petition also states that JAA Lincoln will provide parents, scholars, and the District with copies of all appropriate scholar records, transfer scholar records in compliance with the Family Educational Rights and Privacy Act (20 U.S.C. § 1232(g)), and if the District will not or cannot store the records, JAA Lincoln will work with the County Office of Education to determine a suitable location for storage. (Pet.'s Revised Renewal Petition at 140-142, 144.)

Finding 5: The District is positioned to absorb the fiscal impact of the proposed charter school.

Consistent with the District's current budget certification as positive and JAA Lincoln's operations over the past seven (7) years, the District is positioned to absorb the fiscal impact of the proposed charter school. (Ed. Code, § 47605, subd. (c)(8).)

Finding 6: The Renewal Petition contains 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 Chapter 10.7 (commencing with section 3540) of Division 4 of Title 1 of the Government Code.

The Renewal Petition does contain a declaration that the charter school shall be deemed the exclusive public school employer of the employees of JAA Lincoln for purposes of the Educational Employment Relations Act. (Pet.'s Revised Renewal Petition at 5.)

Finding 7: The Charter School is demonstrably likely to serve the interests of the entire community in which the school is proposing to locate. (Ed. Code, § 47605, subd. (c)(7).)

Education Code section 47605, subdivision (c)(7), indicates that analysis of this finding requires the consideration of the fiscal impact of the proposed charter school and written findings regarding the extent to which the proposed charter school would substantially undermine existing services, academic offerings, or programmatic offerings, as well as whether the proposed charter school would duplicate a program currently offered within the school district while the existing program has sufficient capacity for the pupils proposed to be served within reasonable proximity to where the charter school intends to locate.

The proposed educational program is reasonably aligned with community interests as identified through the Renewal Petition, including supporting letters and parental satisfaction surveys. The District has reviewed and considered the impact of JAA Lincoln's operation in the community on existing services, academic offerings, and programmatic offerings. While JAA Lincoln may serve students who could otherwise attend the District, which does result in a degree of financial impact on the District, the bearing of this is not of such nature that JAA Lincoln is demonstrably unlikely to serve the interests of the community. Additionally, the District has considered whether JAA Lincoln's educational program duplicates any existing program in which the District has capacity for additional pupils and did not find any such evidence. The District has not made any such findings; rather, JAA Lincoln provides a unique alternative educational program to families who desire an education prioritizing the classical leadership model and the historical/philosophical economic perspectives of which JAA Lincoln has to offer.

Based on the foregoing, the District finds JAA Lincoln is demonstrably likely to serve the interests of the entire community in which the school is proposing to locate. (Ed. Code, § 47605, subd. (c)(7).)

Finding 8: The Renewal Petition Meets the Renewal Criteria for a High-Performing Charter School.

As discussed in section II.B, above, the Renewal Petition identifies JAA Lincoln as a “high-performing” charter school based on its performance during the two (2) years immediately preceding the renewal decision. This designation is confirmed by the CDE’s assigned performance category for JAA Lincoln under criterion 2. The District has concerns with this designation due to insufficient pupil subgroup data on the Dashboard; however, due to the insufficient data the District defers to CDE’s designation.

In determining the school’s performance category, the analysis considers academic indicators for which there is sufficient data, removes student groups that perform above the statewide average, and compares the remaining numerically significant student groups with their respective statewide student-group averages.

The District found that the analysis required could not be completed because JAA Lincoln lacked data for the required subgroups, which were to be compared to the subgroups performing statewide below the state average in each respective year. Specifically, JAA Lincoln did not have subgroup data for 2024 in the academic indicator of English Language Arts for Long-Term English Learners and Foster Youth or in the academic indicator of Mathematics for Long-Term English Learners, Foster Youth, Students with Disabilities, or Black or African American subgroups. For 2025, JAA Lincoln lacked subgroup data in the academic indicator of English Language Arts for Long-Term English Learners and Foster Youth. JAA Lincoln also lacked subgroup data in the academic indicators of Mathematics and Science for English Learners, Foster Youth, and Black or African American subgroups. Further, for either year 2024 or 2025, JAA Lincoln did not report sufficient subgroup data for the academic indicators of English Learner Progress or College/Career to be considered in this analysis. Therefore, the District cannot confirm JAA Lincoln is a “high performing” charter school and so defers to CDE’s designation.

The District also notes, as part of this Finding, that based on a review of the measurements of academic performance, in 2025 JAA Lincoln made improvements in the academic indicators of Mathematics and English Learner Progress.

Specifically in Mathematics, in 2024, the subgroup Socioeconomically Disadvantaged, increased by 20.8 points; though, a decline was made in subgroups of Students with Disabilities and White. Following this in 2025, JAA Lincoln increased its school-wide performance in Mathematics by 4.9 points, meeting the same performance level color of the state, yellow. Significant increases were also made in subgroups of English Learners, increasing by 14.2 points, and Students with Disabilities, increasing by 16.4 points.

With respect to English Learner Progress, in 2024, JAA Lincoln’s school-wide performance level dropped 24.7%, though in 2025 JAA Lincoln’s performance level made a 6.9% increase earning a color of blue and outperforming the District’s and state’s performance levels.

In 2024, JAA Lincoln's performance level for English Language Arts outperformed the state and District. Notable increases were made in Socioeconomically Disadvantaged subgroup, increasing by 18.4 points, and the Two or More Races subgroup, increasing by 23.9 points. In 2025, the academic indicator of English Language Arts decreased school-wide in performance by 0.4 points; though, JAA Lincoln still compared to the state average.

With respect to Science, which is measured based on student performance on either the California Science Test or the California Alternate Assessment for Science, JAA Lincoln's 2025 score increased by 8.3 points earning a performance color of blue and outperforming the District and state.

Additionally, while not a part of the measures of academic performance, the District acknowledges that Chronic Absenteeism and Suspension Rate performance levels also increased in 2025. Chronic Absenteeism increased by 1% reflecting a rate of 15.3% while the state average reflected 17.1%. Notably, in 2025, Chronic Absenteeism increased 10.2% for English Learners, 9.4% for Two or More Races, 3.4% for Hispanic, and 2.7% for Students with Disabilities. The same year, Suspension Rate increased by 0.9%, reflecting a rate of 3.3% compared to the state average of 2.9%. The subgroups of English Learners increased by 1.6%, Hispanic increased by 1.3%, Student with Disabilities increased by 0.5%, and both White and Two or More Races increased by 1%.

JAA Lincoln did not have performance level data for either indicators of College/Career or Graduation Rate. However, based on the data provided, in 2025, JAA Lincoln's Graduation Rate increased by 6.8% and its graduation percentage of 96.3% outperformed the state's 87.8%. Though, based on the 2025 data provided, JAA Lincoln's College/Career indicator declined by 15.5 % leading their prepared percentage rate to be 41.7% compared to the state's 51.7%.

IV. RECOMMENDATIONS

As a high-performing charter, JAA Lincoln's charter may be renewed for five (5) to seven (7) years. (Ed. Code, § 47607 subd. (c)(2)(E).)

The District conducted a thorough review of JAA Lincoln's Renewal Petition and its appendices based on the above-described renewal criteria for a "high-performing" charter school. In careful consideration of this and the above findings of fact, the District recommends renewal of JAA Lincoln's charter for seven (7) years.