OAKLAND UNIFIED SCHOOL DISTRICT
Community Schools, Thriving Students

Material Revision Staff Report

East Bay Innovation Academy

Decision Hearing: November 12, 2026

School Overview

East Bay Innovation Academy			
Current Petition: Charter Term	July 1, 2019-June 30, 2027	**Proposed Material Revision: Charter Term**	July 1, 2019-June 20, 2027
Current Petition: Grades Served	6-12	**Proposed Material Revision: Grades Served**	6-8
Current Petition: Campus Addresses	3400 Malcolm Avenue Oakland, CA 94605 and 3800 Mountain Blvd Oakland, CA 94619	**Proposed Material Revision: Campus Address**	3400 Malcolm Avenue, Oakland, CA 94605
Current 2026-27 Enrollment (Grades 6-8)[1]	275	**Proposed 2026-27 Enrollment (Grades 6-8)**	285

I. Description of Proposed Revision

East Bay Innovation Academy ("EBIA" or "Charter School") is currently authorized to serve students in Grades 6-12 through June 30, 2027. EBIA has requested a material revision to their current charter petition to discontinue Grades 9-12 and serve only Grades 6-8 for the remainder of its current charter term. The material revision would take effect immediately upon approval and the revised petition, if approved, would become EBIA's operational charter petition.

In 2025-26, EBIA enrolled 481 students, including 271 students in Grades 6-8 and 210 students in Grades 9-12. As of September 25, 2026, EBIA enrolled 275 students for the 2026-27 in Grades 6-8. No students are currently enrolled in Grades 9-12. EBIA's material revision request projects 285 students in Grades 6-8 in 2026-27.

EBIA implemented the proposed material revision to discontinue the high school grades prior to submitting this material revision request. The school ceased to operate Grades 9-12 at the conclusion of the 2025-26 school year. OUSD issued a Notice of Concern regarding the unauthorized change on July 16, 2026. EBIA submitted this material revision request on August 31, 2026.

EBIA's material revision request states that the revision is necessary due to declining enrollment at its high school, making the high school program financially unsustainable. The Charter School explored merging the high school grades of EBIA with Envision Education, but stated that it determined in February 2026 that the partnership was not feasible within the given timeframe. EBIA states that discontinuing the high school grades will reduce costs and allow the school to focus its leadership, staffing, and resources on sustaining and strengthening its middle school program.

[1] Per second month statistical report submitted to OUSD (as of September 25, 2026).

II. Background and Analysis Overview

Procedural Background

1. **Charter school board action**: On May 19, 2026, EBIA's governing board adopted a resolution to suspend enrollment and operation of Grades 9-12 for the 2026-27 school year.
2. **Notice of Concern**: On July 16, 2026, OUSD issued a Notice of Concern after EBIA implemented the grade truncation without obtaining approval for the material revision from the OUSD Board. The Notice of Concern identified the following remedies:
    a. By August 7, 2026, provide a written explanation of its support for current and prospective high school students; and
    b. By August 7, 2026, submit written acknowledgment of the requirement to submit a material revision request and obtain OUSD Board approval before submitting a renewal petition; and
    c. By August 18, 2026, submit a material revision request to the OUSD Board of Education for the grade truncation.

    Submission of the material revision request alone does not fully resolve the identified concern. Unless and until the OUSD Board approves the proposed material revision, EBIA's existing charter to serve Grades 6-12 remains in effect.
3. **Response to Notice of Concern**: EBIA did not complete all remedies by the deadlines specified in the Notice of Concern. The written explanation of support for current and prospective high school students, due August 7, was provided on October 1, 2026 in response to OCS's separate request for additional information during the material revision review. As of the publication of this Report, EBIA has not submitted written acknowledgement of the requirement to submit a material revision request and obtain OUSD Board approval before submitting a renewal petition. EBIA did not submit a complete material revision request until August 31, after the August 18 deadline.
4. **Incomplete submissions**: Beginning on July 24, 2026, EBIA submitted materials for a proposed Material Revision. OCS reviewed the submitted materials, identified outstanding submission requirements, and notified EBIA of the additional information required for a complete submission.
5. **Complete Material Revision Submission:** EBIA submitted a complete material revision request on August 31, 2026.
6. **Additional information request and responses**:[2] On September 18, 2026, OCS requested additional information from EBIA regarding its organizational structure, high school closeout, and student transition support. EBIA submitted a response on October 1, 2026. OCS requested further clarification and EBIA provided a second, updated response on October 5. On October 5, OCS requested additional clarification, and EBIA provided a third, updated response on October 5. On October 6, OCS requested additional clarification, and EBIA provided a fourth, updated response on October 6.
7. **Initial Public Hearing:** A public hearing was held on October 6, 2026.
8. **Staff report**: This Staff Report was made public by the 15-day posting requirement, which was October 28, 2026.
9. **Decision Hearing:** A Decision Hearing is to be held on November 12, 2026.

[2] EBIA's final October 6 response is included in the appendix of this Staff Report.

Statutory Framework

Education Code §47607 provides that a material revision to a charter petition may be made only with the approval of the chartering authority and is governed by the standards and criteria set forth in Education Code §47605.

Accordingly, this Staff Report evaluates the proposed material revision and its effects on the Charter School's educational program, enrollment, finances, staffing, governance, and operations. The review is focused on the proposed grade truncation and the resulting middle school program, and is not a comprehensive review of the Charter School's overall performance. The analysis is organized under the following applicable criteria:

Criteria	Education Code Reference(s)
Criterion I: Would the Revised Charter Present a Sound Educational Program?	§47605(c)(1)
Criterion II*:* Is the Charter School Demonstrably Likely to Successfully Implement the Proposed Educational Program?	§47605(c)(2)
Criterion III: Is the Revised Petition Reasonably Comprehensive?	§47605(c)(4) thru (6);§47605(h)

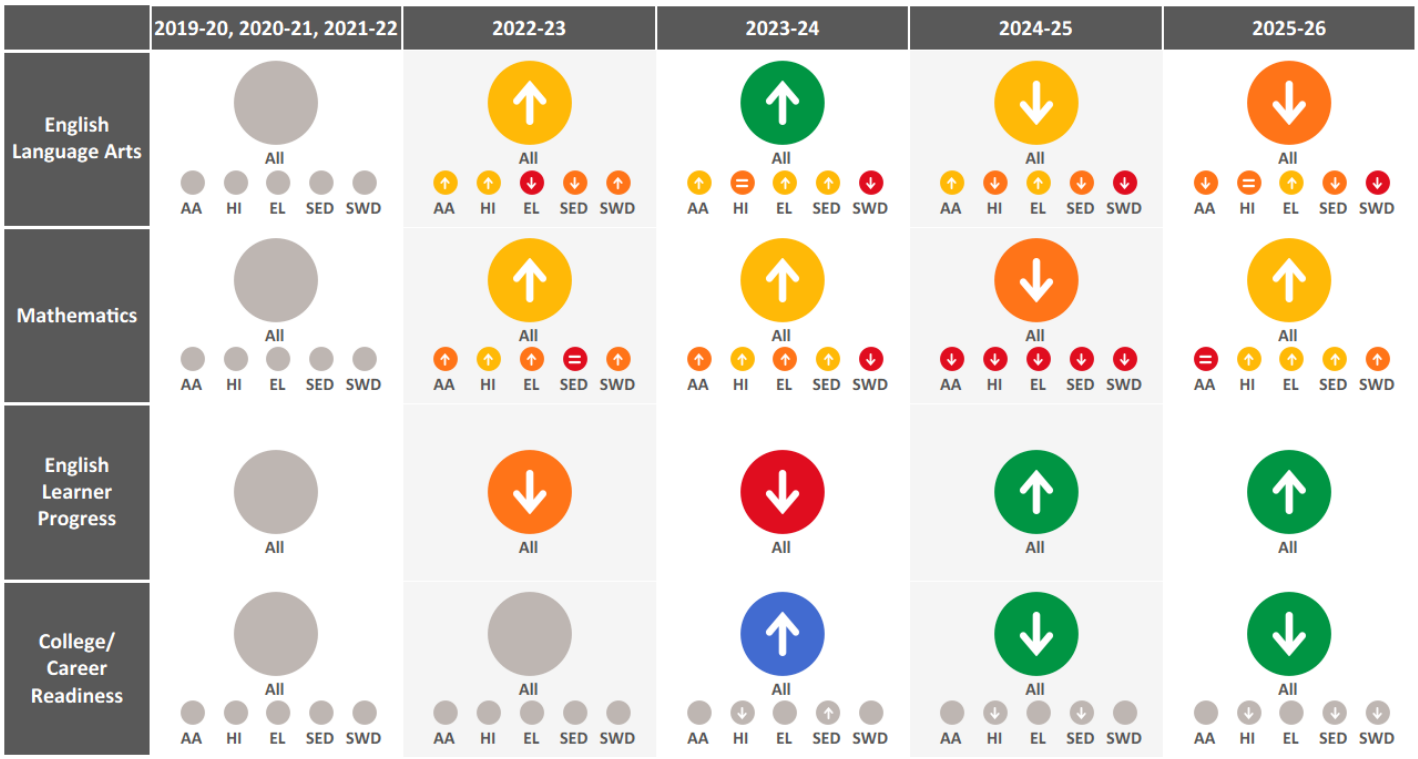
The Board may deny the proposed material revision if it makes written factual findings, setting forth specific facts supporting one or more applicable grounds for denial under Education Code §47605(c). As relevant here, the Board may deny the material revision if it finds that the proposed educational program in the revised petition is unsound; that the Charter School is demonstrably unlikely to successfully implement the program set forth in the revised petition; and/or that the revised petition does not contain reasonably comprehensive descriptions of the required elements.

III. Criteria I: Would the Revised Charter Present a Sound Educational Program?

For a charter school's material revision request to be approved, the revised charter must present a sound educational program for its students. Because the proposed reduction from Grades 6-12 to Grades 6-8 does not materially change the middle school educational program, this Staff Report does not include a full analysis of the school's academic performance. However, in order to give context for the current program, a brief overview of academic performance is included.

Figure 1 below represents the academic indicator results from the California School Dashboard over the course of the current charter term. However, because the California School Dashboard does not disaggregate its results by grade span, this overview represents results across Grades 6-12. The subsequent sections focus specifically on middle school performance as represented by two measures of performance on the Smarter Balanced Summative Assessments ("SBAC"), including average proficiency, disaggregated by grade span, and the 2024-25 California School Dashboard Growth results (Growth results are limited to students in Grades 4 through 8, thus, these results represent only EBIA's middle school performance).

Figure 1: California State Dashboard Results

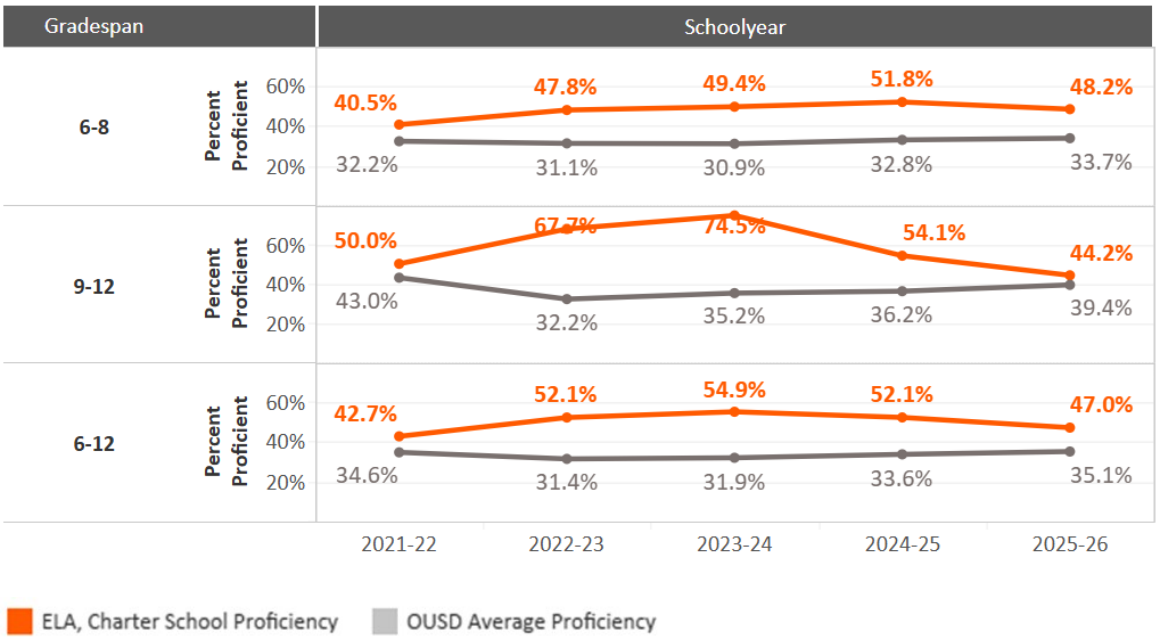


***Source**: California State Dashboard*

ELA Performance in Grades 6-8

As shown in Figure 2, although EBIA's average proficiency at the high school decreased significantly in both 2024-25 and 2025-26, EBIA's middle school proficiency increased. EBIA's middle school average proficiency saw a net 7.7 percentage point increase during the charter term. Per the California School Dashboard Growth Categories, in 2024-25, the most recent year for which there is data, all student groups at the middle school demonstrated either Average or Accelerated Growth. High school grades are not included in California School Dashboard Growth.

Figure 2: Schoolwide ELA SBAC Proficiency Rates Over Time – EBIA and OUSD*



***Source:** Downloadable CAASPP Research Files*
**Testing for 2019-20 was cancelled due to COVID-19. Testing for 2020-21 was optional.*

Figure 3: 2025 ELA Growth Performance Levels by Student Group

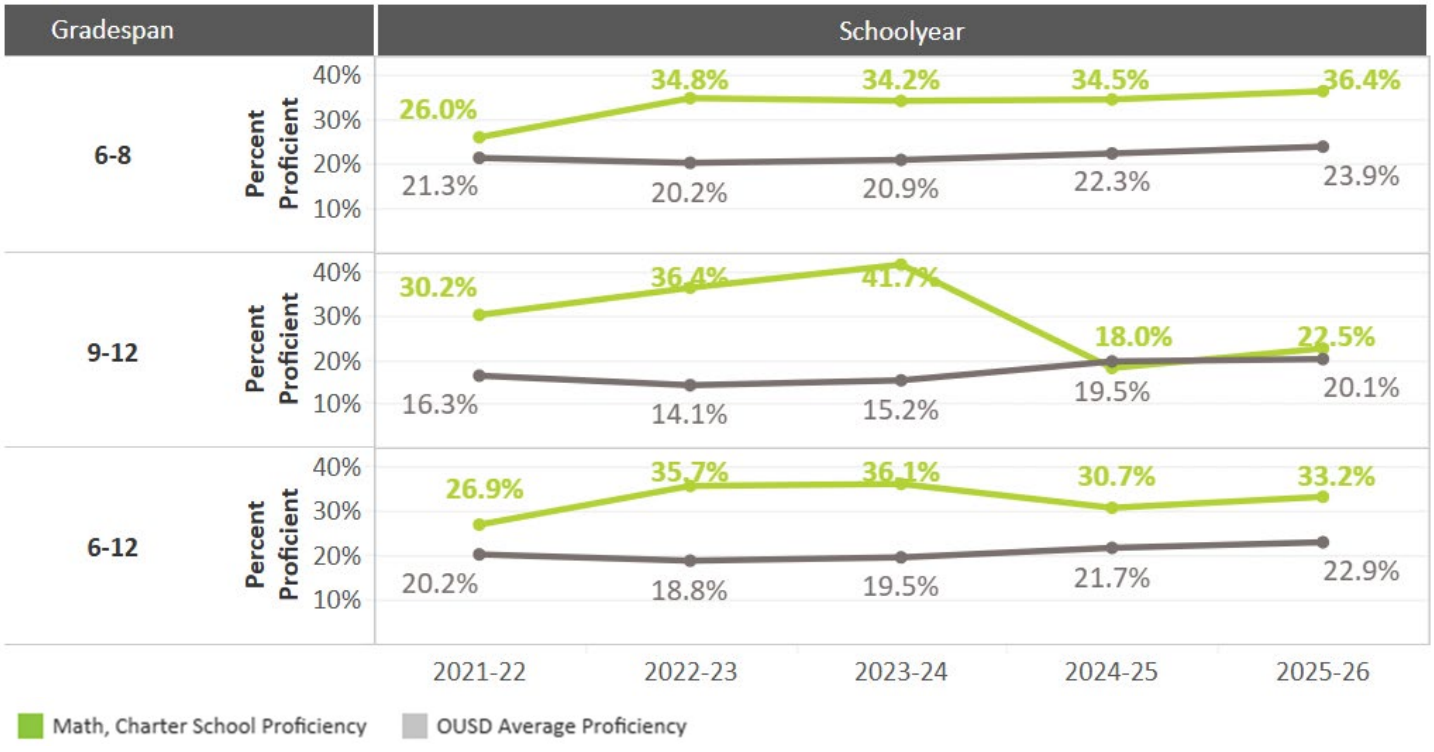
Minimal Growth	Moderate Growth	Average Growth	Accelerated Growth	Exceptional Growth
-	-	Black/African American Long-Term English Learner Students with Disabilities	**All Students** English Learner Hispanic Multiple Races/Two or More Socioeconomically Disadvantaged White	-

***Source**: California School Dashboard*

Math Performance in Grades 6-8

As shown in Figure 4, although EBIA's average proficiency at the high school decreased significantly in both 2024-25 and 2025-26, EBIA's middle school average proficiency increased. EBIA's middle school average proficiency saw a net 10.4 percentage point increase during the charter term. However, per the California School Dashboard Growth Categories, in 2024-25, the most recent year for which there is data, most student groups at the middle school demonstrated Moderate Growth, which is considered below average. High school grades are not included in California School Dashboard Growth.

Figure 4: Schoolwide Math SBAC Proficiency Rates Over Time - EBIA vs. OUSD*



***Source:** Downloadable CAASPP Research Files*
**Testing for 2019-20 was cancelled due to COVID-19. Testing for 2020-21 was optional.*

Figure 5: 2025 Math Growth Performance Levels by Student Group

Minimal Growth	Moderate Growth	Average Growth	Accelerated Growth	Exceptional Growth
-	Black/African American English Learner Hispanic Long-Term English Learner Socioeconomically Disadvantaged Students with Disabilities	**All Students** Multiple Races/Two or More	White	-

***Source**: California School Dashboard*

IV. Criteria II: Is the Charter School Demonstrably Likely to Successfully Implement the Proposed Educational Program?

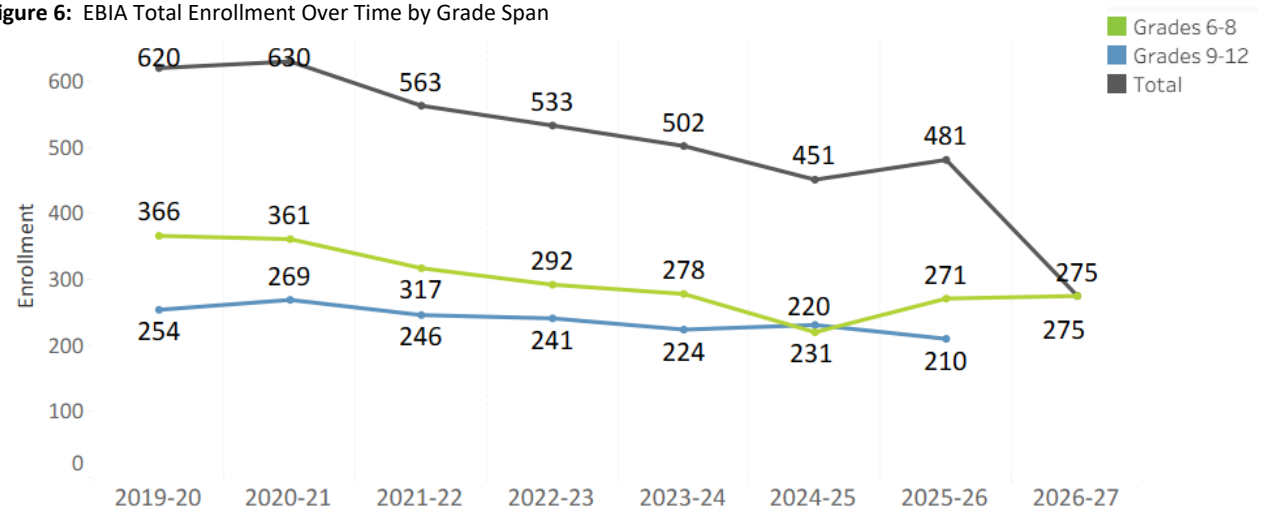
The proposed material revision would eliminate Grades 9-12, resulting in a substantially smaller charter school serving only Grades 6-8. In evaluating whether the Charter School is demonstrably likely to successfully implement the educational program described in the revised petition, Staff considered whether the Charter School has demonstrated the enrollment, financial, leadership, governance, and operational capacity necessary to sustain the proposed 6-8 program.

A. Enrollment

Total Enrollment by Year

As shown in Figures 6 and 7, EBIA's total enrollment declined significantly over the charter term. Total enrollment fell by 169 students between 2019-20 and 2024-25, with approximately 80% of that loss occurring at the middle school level. Middle school enrollment then rebounded, rising approximately 17.3% in 2025-26, and enrollment reported by the Charter School as of September 25, 2026, indicates this recovery was sustained into 2026-27. Notably, although middle school enrollment declined at a faster rate than high school enrollment over the term, the middle school enrolled more students than the high school in nearly every year of the term, despite serving one fewer grade level.

Figure 6: EBIA Total Enrollment Over Time by Grade Span



***Source:** 2019-20 through 2025-26 Enrollment – CDE Downloadable School Enrollment Data Files; 2026-27 Actual YTD Enrollment – 2026-27 Month 2 Statistical Report (as of September 25, 2026);*

Figure 7: EBIA Grade Level Enrollment Over Time

Student Enrollment by Grade Level and Total Enrollment								
Grade	**2019-20**	**2020-21**	**2021-22**	**2022-23**	**2023-24**	**2024-25**	**2025-26**	**2026-27**
6	135	110	97	77	93	57	119	88
7	121	128	108	110	79	85	62	117
8	110	123	112	105	106	78	90	70
9	78	63	68	77	60	51	48	-
10	78	76	46	60	77	60	42	-
11	62	64	70	37	53	68	58	-
12	36	66	62	67	34	52	62	-
Total	***620***	***630***	***563***	***533***	***502***	***451***	***481***	***275***

Source: *2019-20 through 2025-26 Enrollment – CDE Downloadable School Enrollment Data Files; 2026-27 Actual YTD Enrollment – 2026-27 Month 2 Statistical Report (as of September 25, 2026)*

Enrollment Projections

As part of its material revision request, EBIA provided the projected enrollment shown below.[3] The actual 2026-27 enrollment the Charter School reported as of September 25, 2026 (275 students) is slightly below the 2026-27 projection of 285. Reaching the 2027-28 projection of 330 would require a 20% increase over September 2026-27 enrollment.

Figure 8: EBIA Projected Enrollment

Projected Student Enrollment by Grade Level and Total Enrollment							
Grade	**2026-27** ***(Actual)***	**2026-27**	**2027-28**	**2028-29**	**2029-30**	**2030-31**	**2031-32**
6	88	100	110	110	110	110	110
7	117	120	110	110	110	110	110
8	70	65	110	110	110	110	110
Total	***275***	***285***	***330***	***330***	***330***	***330***	***330***

Source: *2026-27 Actual Enrollment – 2026-27 Month 2 Statistical Report (as of September 25, 2026); 2026-27 to 2031-32 Projected Enrollment – EBIA Material Revision Petition*

B. Financial Impact of Proposed Grade Reduction

Summary

The Charter School started the 2026-27 school year with adequate reserves and a positive ending fund balance, despite reporting a deficit in 2025-26. Its audits throughout the current charter term received unmodified opinions and did not identify material weaknesses, significant deficiencies, or statutory compliance findings.

EBIA submitted Multi-Year Budget Projections ("MYP") reflecting operation of Grades 6-8 only. The projections cover 2026-27, which represent the remainder of the current charter term, and the two subsequent years. Although the MYP projects annual surpluses, current enrollment is below the school's 2026-27 projection. Further, the 2027-28 projection assumes a substantial enrollment increase that may not be realistic. The reliability of the budget projections depends, in part, on EBIA's ability to achieve and maintain the projected level of enrollment.

[3] EBIA provided projected enrollment through 2031-32; however, because the current charter term expires on June 30, 2027, these projections are contingent on renewal being submitted and approved.

Current Fiscal Health

The figure below summarizes key fiscal indicators for the most recent school year. Appendices A and B show key fiscal indicators and audit results throughout the current charter term.

- *The Charter School reported a deficit of $342,189 and an ending fund balance of $1,648,420 in 2025-26.*
- *At 0.11, the debt ratio indicates that assets exceed liabilities, and the school has the capacity to borrow if needed.*
- *At 9%, the school's cash reserve is above the 5% floor recommended by the Financial Crisis Management Assistance Team.*
- *Throughout the charter term, the audit reports identified no material weaknesses, significant deficiencies, or statutory compliance findings, received unmodified opinions, and were submitted on time except for the 2022-23 school year.*

Figure 9: Fiscal Health Summary

2025-26 *(Unaudited)*				
Annual Surplus or (Deficit)	**Ending Fund Balance**	**Debt Ratio**	**Budgetary Reserve**	**Cash Reserve**
(342,189)	1,648,420	0.11	20%	9%

***Source**: 2025-26 Unaudited Actuals Report*

Enrollment and Attendance Assumptions

The enrollment and attendance rate assumptions underlying the Charter School's projections included with the material revision request are shown in the figure below. As of September 25, 2026, EBIA reported 275 students, compared with its projected enrollment of 285 students for 2026-27. Projected attendance rates are generally consistent with the Charter School's historical patterns.

Figure 10: MYP Summary: Projected Enrollment and Attendance Rates

	2026-27 (Actual)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)
Enrollment	275	285	330	330
Attendance Rate	96.0%	94.0%	94.0%	94.0%

***Source**: Multiyear Budget Projections submitted with material revision petition and 2026-27 Actual YTD Enrollment – 2026-27 Month 2 Statistical Report (as of September 25, 2026)*

As shown previously in Figure 6, EBIA's middle school enrollment declined from 366 students in 2019-20 to 220 students in 2024-25, a decline of 39.9%. Middle school enrollment subsequently increased to 271 students in 2025-26 and 275 students in 2026-27, an increase of 25.0% from 2024-25.

The projected enrollment of 330 students in 2027-28 represents an increase of 55 students, or 20%, from current enrollment. EBIA experienced roughly comparable middle school growth in 2025-26, when enrollment increased by 23.2%, followed by growth of 1.5% in 2026-27. However, the projected 20% increase in 2027-28 is substantial, particularly following the more limited growth in the current year.

Middle School Multi-Year Budget Projections

EBIA's MYP reflects substantially lower revenues and expenditures after discontinuing Grades 9-12. Compared with 2025-26 unaudited actuals, projected revenues decrease from approximately $7.91 million to $4.80 million in 2026-27, while projected expenditures decrease from approximately $8.25 million to $4.78 million.

Figure 11: Key Fiscal Indicators

Financial Indicator	2025-26 (Unaudited)	2026-27 (Projected)	2027-28 (Projected)	2028-29 (Projected)
Total Revenues	7,909,125	4,804,981	5,187,105	5,261,456
Total Expenditures	8,251,314	4,777,461	5,052,024	5,230,127
Annual Surplus or (Deficit) *Indicates whether the school spent more or less than it received in revenue during the year. Deficits are shown in parentheses.*	(342,189)	27,520	135,080	31,329
Ending Fund Balance *Typically represents unrestricted funds, although in some cases, restricted funds that were not fully spent in previous years may be included.*	1,648,420	1,690,121	1,825,202	1,856,531
Debt Ratio *A ratio less than 1 indicates the school has lower debts than assets, representing a lower level of financial risk.*	0.11	Unavailable	Unavailable	Unavailable
Budgetary Reserve *Given the school's ADA, FCMAT[2] prescribes a minimum 5% reserve (calculated as Unrestricted Net Assets / Total Expenditures) as a set aside to prepare for potential liabilities. Reserve rates below this rate indicates poor financial condition.*	20%	35%	36%	35%
Cash Reserve *FCMAT recommends 5%+ cash reserve of the total of all budgeted expenditures (calculated as Unrestricted Cash / Total Expenditures). Below 5% is indicative of a poor financial condition.*	9%	Unavailable	Unavailable	Unavailable

Source: *2025-26 Unaudited Actuals Report; Multiyear Budget Projections submitted with material revision request*

As shown above, in 2026-27, EBIA projects a surplus of $27,520, with projected surpluses in the subsequent two years. The reliability of the MYP depends in part on EBIA's ability to achieve and maintain the enrollment levels assumed in the budget. If enrollment falls below those assumptions and expenditures are not correspondingly reduced, the projected surpluses may not materialize.

C. Staffing, Leadership, and Governance

Leadership, staffing and operational structure

EBIA's current leadership structure includes a full-time principal and assistant principal, as well as a part-time interim executive director, who serves in the role as a contractor. All three are new to their roles for the 2026-27 school year. EBIA stated that following the renewal process, its board plans to evaluate whether the executive director role is necessary after the 2026-27 school year.

EBIA reported that it currently employs the following positions and has no vacancies:

Position	FTE
Principal	1.0
Assistant Principal	1.0

Office Manager	1.0
Dean of Culture	1.0
Culture and Climate Specialist	1.0
Office Assistant	1.0
Teacher or Education Specialist	20.0
Total FTE	**26.0**

EBIA reported that the discontinuation of the high school grades resulted in the following position reductions, in addition to the executive director becoming a part-time contracted position:

- 12 teachers
- 2 Instructional Assistants
- 1 Office Assistant
- 1 Director of College & Career Readiness
- 1 Culture and Climate Specialist
- 2 Directors of Operations

EBIA identified the principal as responsible for human resources, special education, compliance, enrollment, and student information/data management, with responsibilities also assigned to the assistant principal, dean of culture, office manager, lead education specialist, and interim executive director.

EBIA's initial response to OCS's September 18, 2026 inquiry stated that it supplements internal staffing through contracts with "external organizations for specific administrative, technical, and lower-level operational support." In response to further inquiry from OCS, EBIA identified Envision Education ("Envision") and EdTec as its primary contracted support providers.

The submitted agreement with Envision establishes a fee of 15% of EBIA's projected LCFF revenue, representing $482,376 for 2026-27. The agreement details support for finance and accounting, human resources, special education program oversight and compliance, enrollment, technology, facilities, and state, federal, and authorizer compliance, and academic leadership supervision and coaching. The agreement states that EBIA retains ultimate responsibility and decision-making authority for the school, and that EBIA remains responsible for delivery of special education services and daily school operations. The submitted EdTec statement of work describes payroll processing and reporting at an annual fee of $47,500.

The services contracted to Envision include many functions central to EBIA's ongoing operations. With both of the director of operations positions eliminated for 2026-27, EBIA has limited dedicated in-house administrative staffing beyond the personnel also responsible for daily school operations. Although EBIA and its board retain responsibility for the school, the viability of the current structure depends in part on the effectiveness and continuation of Envision's contracted support. The Envision agreement covers the remainder of EBIA's current charter term through June 30, 2027.

EBIA's revised organizational structure is newly implemented for the 2026-27 school year, and there is therefore a limited basis on which to assess whether it can support both the middle school program and EBIA's administrative and compliance requirements. The possible elimination of the part-time executive director position after this school year raises an additional question about how executive responsibilities would be assigned and supported.

Implementation and transition planning

EBIA indicated that the closeout of the high school grades is complete, with no outstanding closeout activities remaining. In response to OCS's request for information about EBIA's support for students who otherwise would have attended EBIA's high school in 2026-27, EBIA described communications and transition activities between November 2025 and February 2026. These included family and student communications, town halls, listening sessions, newsletters, school

visits, individualized family calls, information sessions, and outreach to rising seniors. EBIA also stated that they hired a Transition Specialist to serve as a liaison for students, staff, and families and stated that the specialist coordinated with Envision to support the transition. EBIA's response is included as Appendix C.

EBIA had explored a merger with Envision that did not move forward. Although EBIA described continued transition support, its response does not explain what support was provided after the merger did not proceed, or how it addressed the timing of the May 19, 2026 vote to discontinue the high school, which occurred after the typical enrollment period had ended, and which would restrict the school transfer options for its high school students. EBIA's response did not provide placement or outcome data for impacted students and does not identify how the Board monitored student placements or identified any unresolved transition needs.

Governance

On April 13, 2026, the EBIA board amended its bylaws to reduce the minimum required membership from five to three. EBIA's governing board currently consists of three members, after three of the six members resigned in June 2026. Although its current membership meets the amended bylaws' requirement, the relatively small number of remaining members and the loss of board capacity with the departures raise concerns about the EBIA board's governance capacity, particularly during the current organizational transition.

EBIA's governing board voted on May 19, 2026 to suspend enrollment and operation of Grades 9-12 for the 2026-27 school year. EBIA implemented that change before requesting or obtaining the OUSD Board's approval of the material revision. Following OUSD's July 16, 2026 Notice of Concern, EBIA submitted its material revision request on August 31, 2026. EBIA's implementation of the grade truncation before requesting and obtaining OUSD approval for the material revision raises concerns about the EBIA board's oversight of the school's compliance obligations.

V. Criteria III: Is the Petition Reasonably Comprehensive?

A. The Required Fourteen Elements

All charter petitions must include a "reasonably comprehensive" description of 14 required elements related to the school's operation. [4] The following table summarizes staff findings related to whether this standard was met for each element.

Figure 12: Petition Element Analysis

Element	Reasonably Comprehensive?
1. Description of the educational program of the school, including what it means to be an "educated person" in the 21st century and how learning best occurs.	Yes
2. Measurable student outcomes	Yes
3. Method by which student progress is to be measured	Yes
4. Governance structure	Yes
5. Qualifications to be met by individuals employed at the school	Yes
6. Procedures for ensuring health and safety of students	Yes
7. Means for achieving a balance of racial and ethnic, English learner, and special education students	Yes
8. Admission policies and procedures	Yes
9. Suspension and expulsion procedures	Yes
10. Manner for covering STRS, PERS, or Social Security	Yes
11. Attendance alternatives for students residing within the district	Yes

[4] EC §47605(c)(5)

12. Employee rights of return, if any	Yes
13. Dispute resolution procedure for school-authorizer issues	Yes
14. Procedures for school closure	Yes

***Source**: Ed Code §47605(c)(5) subsection (A) thru (O) and staff analysis of the charter material revision petition*

B. Other Required Information

In addition to the required 14 elements, the Education Code also requires all charter petitions to include the following information.

Figure 13: Other Required Information

Required Information	Included in Petition?
An affirmation of each of the conditions described in EC §47605(h).	Yes
A declaration of whether or not the charter school shall be deemed the exclusive public employer of the employees of the charter school for purposes of Government Code §3540 through 3540.2 (California's public school collective bargaining law).	Yes
Information regarding the proposed operation and potential effects of the charter school on the authorizer, including: ● The facilities to be used by the charter school, including specifically where the charter school intends to locate. ● The manner in which administrative services of the charter school are to be provided. ● Potential civil liability effects, of the charter school on the authorizer.	Yes
Financial statements that include the annual operating budget and 3-year cashflow and financial projections, backup and supporting documents and budget assumptions (i.e. anticipated revenues and expenditures, including special education, and projected average daily attendance).	Yes
If the school is to be operated by, or as, a nonprofit public benefit corporation, the petitioner shall provide the names and relevant qualifications of all persons whom the petitioner nominates to serve on the governing body of the charter school.	Yes
A reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed.	Yes

***Source**: Ed Code §47607(b), §47605(c)(4), §47605(c)(6), and §47607(g); staff analysis of the charter material revision petition*

C. OUSD-Specified Requirements

Figure 14: OUSD-Specified Requirements

OUSD-Specified Requirement	Included in Request?
District Required Language	Yes
Material Revision Application Form	Yes
3 Year Multi-Year Budget Projection	Yes
Signed Resolution, approved by the Charter Schools Governing Board	Yes
Cover letter signed by the charter school governing board president or designee	Yes
Supplemental Application: Enrollment Increase or Grade Level Change	Yes

***Source**: Staff analysis of the charter material revision petition*

VI Summary of Analysis

The following section summarizes the Charter School's strengths and challenges related to each applicable review criterion.

A. Criteria 1: Would the revised charter present a sound educational program?

Strengths	Challenges
• Middle school ELA proficiency increased 7.7 percentage points over the current charter term. • In 2024-25, all middle school student groups with ELA growth results had Average or Accelerated Growth. • Middle school Math proficiency increased by 10.4 percentage points over the current charter term.	• In 2024-25, most middle school student groups with Math growth results had Moderate Growth, which represents below average growth.

B. Criteria 2: Is the Charter School Demonstrably Likely to Successfully Implement the Proposed Educational Program?

Strengths	Challenges
• Middle school enrollment increased from 220 students in 2024-25 to 271 in 2025-26 and was 275 in September 2026. • EBIA reports no current staffing vacancies, with a full-time principal and assistant principal. • Agreements with Envision Education and Ed Tec provide administrative, academic, and payroll support. • EBIA described outreach and transition assistance for affected high school students and families, including a dedicated transition specialist.	• The 2027-28 projected enrollment of 330 students would require a 20% increase over September 2026 enrollment. • Staffing reductions following the truncation of the high school leaves limited dedicated in-house administrative capacity, with ongoing operations dependent in part on Envision's contracted support. • EBIA implemented the grade truncation before requesting or obtaining OUSD approval, raising concerns about the governing board's oversight of compliance obligations. • EBIA's May 19, 2026 vote to discontinue the high school occurred after the typical enrollment period had ended, which would restrict the school transfer options for its high school students. • The governing board has decreased from six to three members, raising concerns about its capacity to oversee the school during the organizational transition. • The principal, assistant principal, and interim executive director are all new to their roles, and the newly implemented organizational structure provides a limited basis for assessing its effectiveness.

C. Criteria 3: Is the revised petition reasonably comprehensive?

Strengths	Challenges

• Charter petition contains reasonably comprehensive descriptions of the required 14 elements. • OUSD-specified requirements are included in the petition.	N/A

VII Board Action

After reviewing the information presented in this Staff Report and at the initial and decision public hearings, the OUSD Board will vote to approve or deny the Charter School's request to truncate from a school serving Grades 6-12 to a school serving Grades 6-8, effective immediately and for the duration of the current charter term, ending June 30, 2027.

In making its determination, the Board should apply the criteria discussed above to assess whether the petition presents a sound educational program, whether the school is likely to implement the educational program, and whether the petition contains all required elements. A material revision is not a comprehensive review of the Charter School's overall performance or a charter renewal proceeding.

OPTION 1: APPROVE MATERIAL REVISION

Board Action

Vote to approve the Charter School's request for a material revision to its current charter petition to truncate from serving Grades 6-12 to Grades 6-8.

Board Process

To approve the material revision, the Board shall vote to approve the Charter School's material revision request, effective immediately.

Effect of Approval

If the Board approves the proposed material revision, the revised charter petition, including only Grades 6-8, shall take effect immediately and become the Charter School's operative charter for the remainder of the current charter term.

OPTION 2: DENY MATERIAL REVISION

Board Action

Vote to deny the Charter School's request for a material revision to its current charter petition to truncate from serving Grades 6-12 to grades 6-8 based on one or more of the following findings:

1. The revised charter presents an unsound educational program;
2. The school is demonstrably unlikely to successfully implement the proposed educational program;
3. The revised petition does not contain reasonably comprehensive descriptions of the required charter elements.

Board Process

To deny renewal, the Board must adopt a resolution that:

1. Identifies one or more bases for denial under EC 47605(c) (listed above); and
2. Makes written findings setting forth the specific facts supporting each selected basis for denial.

Effect of Denial

If the Board denies the proposed material revision, the Charter School's existing charter petition to serve Grades 6-12 shall remain in effect, and the proposed grade truncation will not be authorized. Because the Charter School has already discontinued Grades 9-12, if the proposed material revision is denied, EBIA will be operating in violation of its approved charter petition.

Appendix A – Fiscal Health Summary

Figure 15: Fiscal Health Summary

Financial Indicator	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26 (Unaudited Actuals)
Annual Surplus or (Deficit) *Indicates whether the school spent more or less than it received in revenue during the year. Deficits are shown in parentheses.*	94,726	372,859	968,519	53,759	(145,154)	52,403	(342,189)
Ending Fund Balance *Typically represents unrestricted funds, although in some cases, restricted funds that were not fully spent in previous years may be included.*	688,224	1,061,083	2,029,602	2,083,361	1,938,207	1,990,610	1,648,420
Debt Ratio *A ratio less than 1 indicates the school has lower debts than assets, representing a lower level of financial risk.*	0.67	0.62	0.22	0.36	0.14	0.11	0.11
Budgetary Reserve *Given the school's ADA, FCMAT[5] prescribes a minimum 5% reserve (calculated as Unrestricted Net Assets / Total Expenditures) as a set aside to prepare for potential liabilities. Reserve rates below this rate indicates poor financial condition.*	10%	15%	26%	25%	22%	24%	20%
Cash Reserve *FCMAT recommends 5%+ cash reserve of the total of all budgeted expenditures (calculated as Unrestricted Cash / Total Expenditures). Below 5% is indicative of a poor financial condition.*	16%	12%	18%	19%	13%	13%	9%

***Source**: 2019-20 through 2024-25 Annual Audit Reports and 2025-26 Unaudited Actuals Report*

[5] *Financial Crisis and Management Assistance Team*

Appendix B – Annual Financial Audit Reports Summary

Figure 16: Annual Financial Audit Reports Summary

Indicator		2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Timely Audit Submission *State law requires annual audits to be submitted by December 15.*		Yes	Yes	Yes	No	Yes	Yes
Audit Opinion *"Unmodified" indicates the financial statements fairly represent the school's financial position in accordance with accounting standards. "Modified, qualified" opinion indicates a material issue or insufficient evidence in a specific area of the financial statements, while the remainder are considered reliable.*		Unmodified	Unmodified	Unmodified	Unmodified	Unmodified	Unmodified
Material Weakness(es) *A material weakness is a deficiency in internal controls that creates a reasonable possibility that a material error in the financial statements could occur and go uncorrected.*	***Number of Findings***	-	-	-	-	-	-
	Initial Year of Finding(s)	-	-	-	-	-	-
Significant Deficiency *A significant deficiency is a flaw in internal controls that is less severe than a material weakness, but still merits attention.*	***Number of Findings***	-	-	-	-	-	-
	Initial Year of Finding(s)	-	-	-	-	-	-
Statutory Compliance *Statutory compliance is adherence to specific state and federal laws and regulations that govern operations, funding, and program requirements within the scope of the audit.*	***Number of Findings***	-	-	-	-	-	-
	Initial Year of Finding(s)	-	-	-	-	-	-

***Source**: 2019-20 through 2024-25 Annual Audit Reports*

Appendix C – EBIA's October 6, 2026 Response to OUSD Inquiries

EBIA Material Revision Additional Information Request

1. Current organizational structure

a. EBIA's current organizational chart, including names and any vacancies, titles, and FTE for each position.

b. Identify which individuals and/or organization(s) are responsible for key operational functions including human resources, special education, compliance, enrollment, and student information/data management.

Current Organizational Structure

	Position	First Name	Last Name	Responsibilities
1	English - 6 (FTE)	Brianna	Adachi	
2	English - 7 & 8 (FTE)	Afra	Ahmed	
3	Lead Education Specialist(FTE)	Gabriela	Alvarado	Special Education
4	History - 7 & 8 (FTE)	Christine	Ashley	
5	Assistant Principal (FTE)	Sarah	Blair	Student Information/Data Management
6	Fitness Teacher (FTE)	Steiv	Boyd	
7	History - 6 (FTE)	Shantanu	Deshmane	
8	Dean of Culture (FTE)	Ernesto	Diaz	Compliance, Student Information/Data Management
9	Science - 8 & Science Olympiad (FTE)	Michelle	Fitts	
10	Fitness Teacher & Athletic Director (FTE)	Darius	Foster	
11	Science - 7 (FTE)	Chiana	Griswa	
12	Culture and Climate Specialist (FTE)	Jordan	Jabson	
13	Office Manager (FTE)	Isabel	Lupian	Enrollment, Student Information/Data Management
14	Art Teacher (FTE)	Michael	Marzec	
15	Math - 7 (FTE)	Asha	Nair	

16	Education Specialist (FTE)	Erin	Oh	
17	Math - 8 & Algebra (FTE)	Joseph	Oh	
18	English - 7 (FTE)	Katharine	Osajima	
19	Education Specialist (FTE)	Angel	Peacock	
20	Art Teacher (FTE)	David	Rosales	
21	Office Assistant (FTE)	Christina	Sarabia-Sanchez	
22	Science - 6 (FTE)	Pluto	St John	
23	Math - 6 (FTE)	Keith	Vann	
24	Principal (FTE)	Rachel	Viegas	Human Resources, Special Education, Compliance, Enrollment, Student Information/Data Management
25	History - 7 (FTE)	Delia	Zhou	
26	Instructional Aid	Noelle	Shaw	

EBIA maintains direct responsibility and oversight for all key operational functions, including human resources, special education, compliance, enrollment, and student information/data management. These functions are led and managed by EBIA's school-based leadership and staff, who retain responsibility for decision-making, implementation, and accountability.

As has been EBIA's practice since the beginning of its charter, the school supplements its internal capacity by contracting with external organizations for specific administrative, technical, and lower-level operational support. These partnerships do not transfer responsibility for EBIA's core operational functions; rather, they provide specialized services and additional capacity to support the school's work.

This structure reflects EBIA's longstanding operational model: EBIA remains accountable for and maintains oversight of its key functions while strategically utilizing contracted partners to provide specialized and supplemental support.

d. A brief description of whether the current organizational structure as described above is intended to be temporary or permanent. If temporary, what is the anticipated duration?

Organizational Structure – Permanent Structure

EBIA's current organizational structure is intended to be permanent and aligned with the

school's continued operation as a grades 6–8 middle school. The structure is designed to provide clear leadership, instructional, operational, student support, and compliance functions while maintaining appropriate staffing across core academic subjects, special education, school culture, athletics, arts, and school operations.

The Principal serves as the primary school-site leader, with responsibility for instructional and organizational leadership and oversight of key areas including human resources, special education, compliance, enrollment, and student information and data management. The Principal is supported by the Assistant Principal, Dean of Culture, Culture and Climate Specialist, Office Manager, special education team, instructional staff, and operational support staff, providing clear distribution of responsibilities and accountability across the school.

The one position that remains under consideration is the Executive Director role. During the 2026–27 school year, the Interim Executive Director is providing executive leadership and support in areas including Board governance, leadership coaching, compliance, the Material Revision process, and the Charter Renewal Petition. Following completion of the charter renewal process, EBIA and its Board will evaluate the ongoing organizational needs of the school and determine whether the Executive Director position should continue as a permanent role or is no longer necessary after the 2026–27 school year.

With the exception of this determination, EBIA does not currently anticipate substantive changes to its organizational structure. The existing structure reflects the leadership and staffing model EBIA intends to maintain as a grades 6–8 school, while allowing for reasonable adjustments over time based on enrollment, student needs, staffing, budget considerations, and operational requirements.

2. Closeout of high school

a. A list of positions eliminated or reduced as a result of the truncation of the high school grades.

Position Reductions

- Teaching force will be reduced by 12 positions
- 2 Instructional Assistants
- 1 Office Assistant
- 1 Director of College & Career Readiness
- 1 Culture and Climate Specialist
- 2 Directors of Operations

Position Changes

- Revised Executive Director position
- Principal full time over grades 6-8
- AP full time over grades 6-8

b. Is the closeout of EBIA's high school program and upper campus complete? If it is not, identify the outstanding closeout activities and anticipated completion dates.

Yes. The closeout of EBIA's high school program and upper campus is complete. EBIA completed the programmatic transition, including student and family transition support, staff and community communications, enrollment transitions, and closure of high school operations. EBIA also provided dedicated transition support throughout the process to ensure students and families were supported in identifying and transitioning to new high school options. There are no outstanding high school program or upper campus closeout activities at this time.

3. A written explanation of the steps EBIA took during the 2025-26 school year to support the transition to other schools of students who otherwise would have attended EBIA in grades 9-12 in 2026-27, , including continuing and newly admitted students, given that the EBIA Board voted to discontinue grades 9-12 after the typical enrollment period.

High School Program and Upper Campus Closeout Transition Support

The closeout of EBIA's high school program and upper campus is **substantially complete**. EBIA implemented a comprehensive transition process designed to ensure that students, families, and staff received timely communication, opportunities for direct engagement, and individualized support throughout the transition.

Beginning in November, EBIA implemented a coordinated communication and engagement plan that included staff meetings and FAQs, family and student communications, town halls, listening sessions, staff conversations, newsletters, and opportunities for students and families to learn about transition options. In December, students participated in a visit to Envision, and families continued to receive transition information and updates. During January and February, EBIA expanded its outreach through individualized family calls, school visit updates, multiple information sessions, direct student and staffing communications, rising senior outreach, student follow-up, and Intent to Return communications.

To provide additional continuity and direct support throughout the closeout process, EBIA hired a Transition Specialist who was primarily stationed at the high school campus three days per week and attended additional transition-related events and gatherings as needed. The Transition Specialist served as a consistent and accessible liaison for students, staff, and families, helping to identify and respond to concerns, facilitate communication, build trusting relationships, and ensure that community needs were heard and addressed throughout the transition. The role also worked in close coordination with Envision to support alignment and clarity as students and families navigated the transition.

Following the intensive November through February outreach period, EBIA established a more

streamlined and centralized communication process for families. This provided families with continued access to consistent information regarding the high school transition, important dates, enrollment and transition steps, available resources, and opportunities for additional support. EBIA continued to respond directly to individual family questions and needs throughout the remainder of the transition.

Together, these efforts provided multiple layers of transition support: regular written communication, individual outreach, information sessions and community meetings, school transition opportunities, and dedicated on-site transition support. The intent was not simply to communicate that the high school program was closing, but to provide students and families with meaningful assistance as they identified and transitioned to appropriate high school options.

The programmatic closeout and primary student, family, and staff transition activities are complete. EBIA is no longer operating its high school program or upper campus and is focused on its grades 6–8 middle school program.

Overall, EBIA approached the high school closeout with an emphasis on continuity, accessibility, clear communication, and individualized support. The combination of a structured communication plan, dedicated transition staffing, direct family engagement, and ongoing administrative follow-through was designed to ensure that students, families, and staff were supported throughout the transition and that EBIA responsibly completed the closeout of its high school program.

Communication Breakdown November 2025 - February 2026

November	December	January	February
11/5: Staff Meeting & FAQ	12/10: Students Visit Envision	1/6: 8th-10th Family Calls	2/5: HS Info Session (3800)
11/6: Family/Student Launch	12/12: Future Newsletter #2	1/7: Visits Update	2/7: Info Session #5
11/6: Lunch Chat (US Staff)	12/19: Future Newsletter #3	Week 1/9 - Informal Pulse point Student Return	2/9: Future Newsletter #4
11/6: Town Hall (Families)		1/10: Info Session #1	2/10: Info Session #6
11/7: Lunch Chat (LS Staff)		1/15: Info Session #2	2/20: Intent To Return
11/7: Zoom Town Hall		1/24: Info Session #3	2/25: Intent To Return Follow-up
11/10: Listening Sessions		1/27: Staffing Direct Address	
11/12: In-Person Session		1/28: Info Session #4	

(US)			
11/12: Jillian at Staff Mtg		1/29: Rising Seniors Email	
11/21: Student Email		1/30: Student Follow-up	
11/21: Future Newsletter #1		1/30: New Sessions Announced	