SANTA ROSA CITY SCHOOLS
STAFF REPORT, PROPOSED FINDINGS OF FACT & RECOMMENDATION
CONCERNING THE SANTA ROSA FRENCH AMERICAN CHARTER SCHOOL REQUEST
FOR A MATERIAL REVISION TO ITS CHARTER

Date Posted: November 24, 2026

The following provides a summary of the Santa Rosa City Schools' ("District" or "SRCS") staff report, proposed findings of fact, and recommendation concerning the Santa Rosa French American Charter School's request for a material revision to its charter.

Introduction and Procedural Background

Under the authorization of Santa Rosa Elementary School District, and the governance and oversight of Santa Rosa City Schools (collectively, "SRCS" or "District"), Santa Rosa French American Charter School ("SRFACS" or "Charter School") has operated as a dependent, classroom-based, French language dual-immersion charter school since 2012. The Charter School's most recent renewal occurred in 2021, at which time the Board approved a five-year term from July 1, 2021, through June 30, 2026. Subsequent legislation triggered a series of charter term extensions, and now the Charter School's charter term is set to expire on June 30, 2028.

The Charter School is seeking to materially revise its current charter ("Charter") to incorporate official updates to the Charter School's change in location previously made by the District's Board and updates to lottery preferences (collectively, the "Material Revision"). The District received this request on November 9, 2026.

As part of the District's facilities consolidation and optimization process, SRFACS was asked to relocate to better serve the needs of District students. This decision was made following the consolidation process approved by the SRCS Board in February 2025. The Material Revision, therefore, serves to memorialize the Board's decision and action in the Charter.

In addition, recent renewals of the other dependent charter schools authorized by the District resulted in updates to admissions processes and lottery preferences. SRFACS wishes to update its lottery preferences and admissions processes to more closely align with other dependent charter schools of the District in order to maintain clarity and consistency. In addition, SRFACS requests certain modifications to its lottery process to better align with its two-way bilingual immersion model.

On November 18, 2026, the District's Board of Trustees ("Board") held a public hearing to determine the level of support for the Material Revision by teachers, other District employees, and parents/guardians.

On December 9, 2026, the District's Board will hold a public hearing on the Material Revision during which the Board will take action to either grant or deny the Material Revision.

As discussed in further detail below, District staff, in consultation with legal counsel, has conducted an extensive analysis of the requested Material Revision and its accompanying exhibits. The District's review team also carefully evaluated the legal grounds articulated in the Education Code for purposes of determining whether the Material Revision meets the minimum standards for approval. District staff have determined that the proposed Material Revision to the Charter Petition **meets the minimum requirements** under the Education Code for approval of the requested change.

Based on its analysis, District staff recommends that the Board **approve** SRFACS's Material Revision, along with any conditions that may be specified by the Board.

Executive Summary

Does the Material Revision demonstrate any legal grounds for denial?		**No**
1.	Does the Material Revision result in an unsound educational program?	**No**
2.	Does the Material Revision result in the petitioners being demonstrably unlikely to successfully implement the program set forth in the petition?	**No**
3.	Has the Charter Petition been updated to contain reasonably comprehensive descriptions of all new charter school requirements enacted since the Charter was last renewed (Education Code § 47607(b))?	**Yes**
4.	Does the Material Revision result in the Charter School being demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate (Education Code § 47607(a)(4))?	**No**

REQUIRED ELEMENTS OF THE PETITION **For the Material Revision, the Charter Petition must only be updated to contain reasonably comprehensive descriptions of all new charter school requirements enacted since the Charter Petition was last renewed.**			
#	**Element / Category**	**Reasonably Comprehensive Updates?**	**Updates Made**
1	Description of Educational Program	**Yes**	Updates to Section 504 and Special Education sections.
2	Measurable Student Outcomes	**NA**	No required updates.
3	Methods for Measuring Student Progress	**NA**	No required updates.

4	Governance Structure	**Yes**	Legal updates only.
5	Employee Qualifications	**NA**	No required updates.
6	Health and Safety Procedures	**Yes**	Legal updates only.
7	Demographic Balance	**NA**	No required updates.
8	Admissions & Lottery Procedures	**Yes**	Updates to lottery procedures and preferences.
9	Student Discipline Procedures	**Yes**	Legal updates only.
10	Retirement Systems	**NA**	No required updates.
11	Public School Attendance Alternatives	**NA**	No required updates.
12	Post-Employment Rights of Employees	**NA**	No required updates.
13	Dispute Resolution Procedures	**NA**	No required updates.
14	Closure Procedures	**NA**	No required updates.
Required Supplemental Information			
Financial Information, Audit, and Administrative Plan		**Yes**	Legal updates only.
Operations and Potential Impacts		**Yes**	Location Updates
Community Impacts		**NA**	No required updates.

Material Revision Review Criteria Under Education Code Sections 47605 and 47607 and Corresponding Findings of Fact

Education Code section 47607(a)(3) requires approval by the chartering authority for any material revision to a charter petition. Sections 47607(a)(3) and 47607(b) establish that material revisions are governed by the standards and criteria in Education Code section 47605. Review includes consideration of the soundness of the proposed educational program and the petitioners' ability to successfully implement it. The revised petition must also include reasonably comprehensive descriptions of all new requirements applicable to charter schools enacted since the charter was originally granted or last renewed. Any denial must be supported by written factual findings specific to the petition and tied to an applicable statutory ground under Section 47605(c).

Section 47607(a)(4) further provides that review under Section 47605(c)(7), concerning the interests of the entire community, and Section 47605(c)(8), concerning a school district's ability to absorb the fiscal impact, must be limited to the impact of the proposed material revision. Those grounds may support denial of a proposed expansion constituting a material revision, even though they may not be used to deny renewal of the existing charter.

Beginning July 1, 2026, Section 47607(b) expressly applies the timelines, deadlines, and other procedures in Section 47605(b) to material revisions. For a district-authorized charter, these procedures include a public hearing within 60 days of receipt of the material revision request, action on the material revision request within 90 days unless both parties agree to an additional 30-day extension, publication of the staff recommendation and proposed findings at least 15 days before the decision hearing, and equivalent time and procedures for the petitioners to respond at that hearing.

Description of the Material Revision

As noted above, the Charter School is seeking to materially revise its Charter to incorporate official updates to its location that the District previously implemented, as well as updates to lottery preferences.

As part of the District's facilities consolidation and optimization process, SRFACS was asked to relocate its programs to better serve the needs of District students. This decision was made following the consolidation process approved by the SRCS Board in February 2025. The Material Revision serves to memorialize the Board's decision in the Charter.

The Material Revision states that the Charter School will operate at 500 E Street, Santa Rosa, California. Students in transitional kindergarten ("TK") through sixth grade will receive instruction at that location. Students in seventh and eighth grade will receive instruction at a satellite campus, co-located with Montgomery High School, at 1250 Hahman Drive, Santa Rosa, California. Both facilities are the property of the District and

are in compliance with health and safety requirements and the Americans with Disabilities Act.

In addition, recent renewals of other District-authorized dependent charter schools resulted in updates to admissions processes and lottery preferences. SRFACS wishes to maintain clarity and consistency by updating its lottery preferences and admissions processes to more closely align with that of other District dependent charter schools—specifically, Santa Rosa Language Academy ("SRLA"), formerly Cesar Chavez Language Academy, and Santa Rosa Accelerated Charter School ("SRACS"), which renewed their respective charters earlier in 2026. Both schools took the opportunity to update their admissions preferences and lottery procedures to be more clear, equitable, and consistent with anti-discrimination standards.

In SRFACS's Material Revision, the Charter School has updated its lottery preferences and admissions processes to align with SRLA and SRACS. This further allows the District to have one standardized admissions process for all of its dependent charter schools.

In addition, the SRFACS Material Revision would implement updates to its lottery process to better align with its two-way bilingual immersion model. The change allows for parallel lotteries to be held, consistent with the processes and procedures described in the SRLA and SRACS petitions, but also supportive of the language model indicated in the Charter School's instructional program.

Below, District staff presents its findings of fact addressing the broad categories of review for the Material Revision.

Finding of Fact No. 1: Unsound Education Program

The changes to the SRFACS's location are unlikely to have any impact on the Charter School's educational program. The program is already in place at the new locations and middle school students continue to have access to additional resources at the Montgomery High School location.

The changes to the general lottery preferences and admission procedures are similarly unlikely to have any impact on SRFACS's educational program. The District believes the consistency across all dependent charters is a benefit to community as a whole.

The District notes, however, that the change to include a language-based component to the lottery preferences is likely to impact the educational program, ideally for the better. SRFACS operates a dual language immersion program ("DLI"). The DLI model is described in Education Code as "programs that provide integrated language learning and academic instruction for native speakers of English and native speakers of another language, with the goals of high academic achievement, first and second language proficiency, and cross-cultural understanding." (Education Code 306(c)(1)). California Department of Education

("CDE") guidance indicates that, "[f]or maximum program effectiveness, the composition of each class should include 50 percent native speakers of the language other than English ("LOTE") and 50 percent native speakers of English. If this is not possible, each student group should comprise at least 33 percent of the class."

The language exposure-based parallel lottery model described in the Material Revision is based on models utilized by other DLI charter schools and school district programs in California. While there is no definitive evidence of what the impact of this lottery model would be, there is similarly no evidence or reason to believe it will have a negative impact on the educational program. SRFACS is hopeful that this lottery model will increase the percent of LOTE speakers and strength the effectiveness of its educational program for all students.

Conclusion No. 1

The District finds the Material Revision presents a reasonably comprehensive description of a generally sound educational program for the students who attend the Charter School. The Material Revision does not compromise or alter that finding.

Finding of Fact No. 2: Demonstrably Unlikely to Successfully Implement.

The changes to SRFACS's location are unlikely to have any impact on its financial position or ability to operate in a legally-compliant manner. There are no noted changes in operating costs or other anticipated financial impacts.

The changes to SRFACS's admissions procedures and lottery preferences are similarly unlikely to have any impact on its financial position.

Implementation of the proposed language exposure-based parallel lottery model is not expected to adversely affect SRFACS's fiscal position or operational capacity. However, given that the model distinguishes between French-speaking and non-French-speaking students in an effort to maintain the fidelity of the DLI program (as discussed below), questions could arise regarding this methodology. Similar models are commonly and successfully used in other districts and charter schools. However, their use elsewhere does not resolve underlying questions or guarantee that the decision will not be challenged.

The parallel lottery model is intended to support the instructional goals of SRFACS's dual language immersion program by promoting a balance between students with and without prior exposure to French. In the research-based instructional model, language balance supports opportunities for students to learn from peers with different language backgrounds. The proposed model seeks to advance this instructional objective while maintaining the same lottery preferences within each pool and allowing available seats to

transfer to the other pool when one pool is exhausted. Its effectiveness in achieving the intended balance will require evaluation.

In consultation with legal counsel, staff recommend that the District approve the parallel lottery model as a pilot for the 2027-28 and 2028-29 enrollment cycles, with District review completed by June 30, 2029, and a final determination made before the start of the enrollment season in fall 2029. During the pilot, SRFACS will provide data on the composition of each applicant pool, admission offers within each pool, and resulting enrollment. Staff will compare these results with available data from prior enrollment cycles to evaluate whether the model supports the intended language balance and whether it changes enrollment access or student demographics. Authorization to use the parallel lottery model will expire on June 30, 2029, unless the Board affirmatively approves its continuation.

If approved, the changes to the admissions process would occur on the following timeline:

Fall Admission Window	2026-27	2027-28	2028-29
For School Year	2027-28	2028-29	2029-30
General Process	As Previous	Updated	Updated
Parallel Pools	No	Pilot Year 1	Pilot Year 2

Conclusion No. 2

The District finds that the Charter School is demonstrably likely to successfully implement the charter program as materially revised. The proposed changes to the Charter School's location and admissions processes are not expected to adversely affect its financial position or operational capacity. Staff further recommend approval of the parallel lottery model for the specified pilot period, subject to the reporting requirements and District review described above.

Finding of Fact No. 3: Comprehensive Petition Updates

In the case of a material revision, the charter petition is required to be updated to reflect all new legal requirements enacted since the last renewal cycle. SRFACS's Charter was last updated in 2021. There have been significant legal updates since that time.

Substantial legal updates were made to the sections of the Charter described below. These are in addition to the proposed Material Revision described above. Where appropriate, updates were made to mirror the language in other recently updated District dependent

charter petitions (i.e., SRLA and SRACS). The following sections of the Charter were updated:

- **Element A – The Education Program**. Updates to the Special Education and Section 504 sections to make them more comprehensive and legally compliant.
- **Element D – Governance.** Updates to requirements of the governing board to comply with relevant law.
- **Element F – Health and Safety**. Addition of required policies and assurances.
- **Element I – Suspension and Expulsion Procedures.** Updates to make the section more comprehensive and legally compliant.
- **Audit**. The section describing the annual audit was removed and the information was added to the administrative structure section.

Considering that the SRFACS Charter has not been updated in some time, prior to submission of a renewal petition, SRFACS will want to closely review and update the sections concerning its educational program and measurable student outcomes to represent the program more fully as implemented. There will likely be additional legal requirements at that time as well.

Conclusion No. 3

The Charter has been updated with a reasonably comprehensive description of new charter school requirements enacted since the Charter was last authorized.

Finding of Fact No. 4: Community Impact

Education Code section 47605(c)(7) provides grounds for a District to deny a material revision to a charter petition if the proposed change results in the Charter School being demonstrably unlikely to serve the interests of the entire community in which the school is located. This is further underscored by language that allows the District to consider the extent to which the proposed revision would substantially undermine existing services, academic offerings, or programmatic offerings and whether the proposed revision would duplicate a program currently offered in the District.

As described in Finding of Fact No. 2 above, proposed changes to location and lottery processes are unlikely to prevent SRFACS from serving the interests of the community in which it is located. At the request of the District, SRFACS has been occupying these locations for over a year, with no adverse outcomes. Similarly, the general lottery

procedures described are in effect at two other District dependent charter schools, with no adverse outcomes.

While the implications of the parallel lottery structure are unknown, considering the change as a pilot program with a defined end point should ensure that if there are unforeseen impacts to the SRFACS's ability to serve the interests of its community, those can be addressed immediately.

Conclusion No. 4

District staff find that the proposed Material Revision would not result in the Charter School being demonstrably unlikely to serve the interests of the entire community in which the school is located.

Conclusion/Recommendation

Based on the District review team's analysis of the above-described criteria for approval of a material revision to a charter petition and the corresponding Findings of Fact Nos. 1-4, including the issues noted therein, District staff recommends that the District's Board of Education **take action to approve** the Material Revision to SRFACS' Charter. Staff further recommend that the approval of the parallel lottery model be on a trial basis as described in Finding of Fact No. 2 to be brought back to the Board for consideration of permanent approval once analysis of its impact can be conducted.