

Charter School Application Report

Wallace Stegner Academy of Nevada

Recommendation for the Summer 2021 Charter Application Cycle

General Information

Proposed Name	Wallace Stegner Academy of Nevada
Proposed EMO/CMO	EMO: Academica Nevada EMO: Wallace Stegner Schools, LLC
Proposed Mission	Wallace Stegner Academy of Nevada will close the academic achievement gap for low-income students and children of color.
Proposed Grade Configuration	Opening: Kindergarten – 4 th Grade Full Scale: Kindergarten – 8 th Grade
Proposed Opening	August 2022
Proposed Location	Temporary location for first year: 6151 W Charleston Blvd, Las Vegas, NV 89146
Zip Codes to be Served	89102, 89103, 89107, 89118, 89145, 89146, and 89147

Process/Key Dates for Wallace Stegner Academy of Nevada

- March 15, 2021 – Notice of Intent is received
- April 12, 2021 – New Charter Application Training
- July 15, 2021 – Application is received
- September 13, 2021 – Clarifying Questions sent to applicant; responses received within 3 business days
- September 20, 2021 - Capacity Interview is conducted¹
- November 5, 2021 – Recommendation is presented

¹ The Wallace Stegner Academy of Nevada capacity interview was conducted virtually as a result of the ongoing COVID-19 pandemic and space limitations within the SPCSA's offices.

Planned Enrollment Chart

	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
K	52	125	125	125	125	125
1	52	125	125	125	125	125
2	52	125	125	125	125	125
3	52	100	125	125	125	125
4	25	100	100	125	125	125
5		50	100	100	125	125
6		60	90	150	150	150
7			60	90	150	150
8				60	60	150
9						
10						
11						
12						
Total	233	685	850	1,025	1,110	1,200

Executive Summary, Process and Recommendation

Upon receipt of a charter application, SPCSA staff reviews the submission for completion and ADA compliance. Should an application be deemed complete, it is assigned to a formal review team and moves to the independent review phase. Members of the review team read and rate each application independently and compile a list of clarifying questions in advance of the capacity interview in an effort to gather additional detail and information about the application prior to the interview. After the capacity interview is conducted, review team members rerate each section of the application against the rubric before finalizing a recommendation.

The review committee, which included one member of the SPCSA staff and two external reviewers, identified shortcomings in all five components of the submitted application. The review committee and SPCSA staff find that the proposed *Meeting the Need, Academic, Operations and Financial Plans* do not meet the standards as outlined in the charter application rubric. Furthermore, the additional addendum component required of an application that contemplates contracting with an Educational Management Organization (EMO) also did not meet the standard.

The review committee and SPCSA staff find that the *Meeting the Need* section of the application ‘Approaches the Standard’ as defined by the charter application rubric. While the Committee to Form articulates a commitment to create a high-quality school in a community that has multiple one and two-star schools, the proposed mission of the school is not consistently reflected in the narrative and some components of the plan for meeting the needs of the intended population are underdeveloped. As a result, the application meets the academic component (geographies with one- and two- star schools) of the SPCSA’s Academic and Demographic Needs Assessment. Based on the narrative and responses provided through the capacity interview, it is not clear that prospective parents and the community were involved in shaping the proposal. Additionally, while the applicant has identified several potential partners, many of the proposed partnerships are still in the early stages of development. Input on this

application was requested from the Clark County School District and is expected to be provided following the school district's board meeting on October 28, 2021 and will be posted alongside this recommendation.

Both the review committee and SPCSA staff find that the proposed *Academic Plan* 'Approaches the Standard' as outlined in the charter application rubric. The proposed academic program is modeled after the Wallace Stegner Academy school in Utah which has had success in increasing proficiency with a population in which a majority of students qualify for free or reduced-price lunch. However, several key components of the *Academic Plan* are lacking sufficient evidence and detail to be rated as meeting the standard, according to the SPCSA's application rubric. For example, the plans or the school's curriculum are lacking clarity and there is not evidence that the academic program would align to Nevada Academic Content Standards. In addition, the plan for serving at-risk students and student with disabilities was lacking detail, raising questions about how the needs of these student populations would be met. Additionally, while some components of the academic plan demonstrate alignment to the school's mission, other components such as the plan for school culture do not appear to fully support the proposed mission.

Overall, the *Operations Plan* was rated as 'Approaches the Standard' by the review committee and SPCSA staff. While the proposed board brings diverse backgrounds and expertise, there is not sufficient evidence that the proposed board is currently prepared to fulfill its responsibilities and ensure the success of the proposed school. In addition, while the narrative sets forth a reasonable incubation year plan, the timeline for hiring the school principal would likely jeopardize the viability of that plan.

The review committee and SPCSA staff find that the *Financial Plan* approaches the standard as outlined in the charter application rubric. While the budget appears to be based on accurate and conservative projections and in most cases, appears to align to the narrative, concerns remain regarding the very small projected surplus in the first year of operations as well as potential for a cash shortage in the first year of operations.

In accordance with Assembly Bill 419 from the 2021 Session of the Nevada Legislature, the SPCSA is required to consider the academic, financial, and organizational performance of any charter schools that currently hold a contract with the proposed CMO or EMO. This information is evaluated through the Addendum section, which is required for applicants that propose to contract with an EMO or CMO. The review committee and SPCSA staff find that this section approaches standards as defined in the charter application rubric. The Committee to Form proposes to contract with two EMOs, Academica Nevada and Wallace Stegner Schools, LLC, and while the past performance of schools affiliated with these EMOs do not raise any significant concerns, neither articulated a process by which they assessed readiness to grow. Additionally, the role of these EMOs, in particular, the role of Wallace Stegner, LCC remains murky. It is not clear what specific services this EMO would be responsible for and there are apparent contradictions between the proposed service agreement, the narrative, and some of the responses provided during the capacity interview. Additionally, the proposed board was unable to clearly articulate how they would evaluate and hold these EMOs accountable.

For these major reasons, in addition to those outlined throughout this document, staff's recommendation is to deny the charter school application for the Wallace Stegner Academy of Nevada.

Notwithstanding the SPCSA staff's recommendation to deny the Wallace Stegner Academy of Nevada charter application, NRS 388A.255(2) provides applicants with an opportunity to resubmit their charter application. Unsuccessful applicants may resubmit their charter application to the SPCSA within 30 days after receiving written notice from the SPCSA that their charter application was denied and correct any deficiencies noted in the SPCSA's notification. In this regard, please note that SPCSA staff typically sends out the written notification required by NRS 388A.255(2) and containing the deficiencies in the charter application within seven to ten days after the SPCSA board votes to deny a charter application.

Given the lengthy and rigorous application process utilized by the SPCSA in regard to charter

applications, as well as the limited timeframe specified in NRS 388A.255(2) for an unsuccessful applicant to resubmit their charter application, the SPCSA encourages only those unsuccessful applicants that the SPCSA has found limited or specific areas where the application does not meet standards to resubmit their charter application. Unsuccessful applicants that the SPCSA has found numerous or significant issues within the application that do not meet standard are encouraged to submit a new charter application during the SPCSA's next application window.

Proposed motion: Deny the Wallace Stegner Academy of Nevada application as submitted during the 2021 Summer Application Cycle based on a finding that the applicant has failed to satisfy the requirements contained in NRS 388A.249(3) and designate Director Feiden and Director Modrcin to meet and confer with the applicant.

Summary of Application Section Ratings

The State Public Charter School Authority is required to assemble a team of reviewers and conduct a thorough evaluation of the application, which includes an in-person interview with the applicant designed to elicit any necessary clarification or additional information about the proposed charter school. The SPCSA is required to adhere to its policies and practices, namely the application guidance, training and rubric, regarding evaluating charter applications. Ultimately, the SPCSA must base its determination on the documented evidence collected through the application process.

Rating options for each section are Meets the Standard; Approaches the Standard; Does not Meet the Standard. These are defined as follows:

- **Meets the Standard:** The response reflects a thorough understanding of key issues. It addresses the topic with specific and accurate information that shows thorough preparation; presents a clear, realistic picture of how the school expects to operate; and inspires confidence in the applicant's capacity to carry out the plan effectively in a way which will result in a 4- or 5-star school.
- **Approaches the Standard:** The response meets the criteria in many respects but lacks detail and/or requires additional information in one or more areas.
- **Does Not Meet the Standard:** The response is undeveloped or incomplete; demonstrates lack of preparation; or otherwise raises substantial concerns about the viability of the plan or the applicant's ability to carry it out.

The rubric is broken into four major sections, plus an addendum, as outlined below. Detailed descriptions of each rubric item can be found in the full rubric located on the SPCSA Application website:

http://charterschools.nv.gov/OpenASchool/Application_Packet/

Summary of Application Section Ratings

Rating options for each section are Meets the Standard; Approaches the Standard; Does not Meet the Standard.

Application Section	Rating
Meeting the Need	Approaches the Standard
Mission and Vision	Approaches the Standard
Targeted Plan	Approaches the Standard
Parent and Community Involvement	Approaches the Standard
Academic Plan²	Approaches the Standard
Transformational Change	Approaches the Standard
Curriculum & Instructional Design	Approaches the Standard
Promotion & High School Graduation Requirements	Approaches the Standard
Driving for Results	Approaches the Standard
At-Risk Students and Special Populations	Approaches the Standard
School Structure: Culture	Does Not Meet the Standard
School Structure: Student Discipline	Approaches the Standard
School Structure: Calendar and Schedule	Meets the Standard
Operations Plan	Approaches the Standard
Board Governance	Approaches the Standard
Leadership Team	Approaches the Standard
Staffing Plan	Approaches the Standard
Human Resources	Approaches the Standard
Student Recruitment and Enrollment	Approaches the Standard
Incubation Year Development	Approaches the Standard
Services	Meets the Standard
Facilities	Approaches the Standard
Ongoing Operations	Meets the Standard
Financial Plan	Approaches the Standard
Addendum	Approaches the Standard
Readiness for Growth	Approaches the Standard
Scale Strategy	Meets the Standard
School Management Contract	Approaches the Standard

² The Wallace Stegner Academy of Nevada proposal did not contemplate Distance Education, Pre-Kindergarten or Dual Credit Partnerships. Therefore, the corresponding sections of the rubric were not scored.

Meeting the Need Section

The application sets forth a mission to “close the academic achievement gap for low-income students and students of color.” However, this mission statement is unevenly reflected throughout the application. While the instructional approach, which relies heavily on regularly monitoring student academic performance to conduct targeted small group instruction appears to align to this mission, alignment is lacking in other areas.

The Committee to Form has identified seven zip codes that the proposed school intends to serve and based on the SPCSA’s Academic and Demographic Needs Assessment, the applicant meets the Academic Need: Geographies with One- and Two- Star Schools. While the narrative provides some information on how the academic program will meet the needs of students with disabilities, at-risk students, and English learners, the application fails to provide comprehensive, credible plans to meet the needs of these student populations. Thus, the application does not meet the Demographic need as outlined in the SPCSA’s Academic and Demographic Needs Assessment. In addition, the application and capacity interview did not provide sufficient evidence that the proposal has been shaped by the community, including parents of perspective students. While the applicant has identified a number of potential partners, questions remain about how some of these partners were selected and many of the partnerships are in the early stages of development and lack clear commitments.

For these reasons, as well as those detailed further below, the review committee and SPCSA staff rated this section as ‘Approaches the Standard.’

Areas of Strength

- The narrative sets forth a mission centered on closing achievement gaps for low-income students and students of color. This mission aligns with the projected student body of the proposed school as the Committee to Form anticipates that 78% of students who enroll in the proposed school would qualify for free and reduced-price lunch and that 63% of students would identify as Hispanic or Latinx.
- The Committee to Form indicates that they anticipate the proposed school providing a quality educational option primarily for students in seven zip codes: 89102, 89103, 89107, 89118, 89145, 89146, and 89147. While all of these zip codes have at least one elementary or middle school rated as one or two stars, two of the zip codes, 89107, 89118, have over 50% of students attending a one- or two-star schools based on the SPCSA’s Academic and Demographic Needs Assessment. As a result, the applicant meets the Academic Need: Geographies with One- and Two- Star Schools, as defined in the SPCSA’s Needs Assessment.
- The application indicates that the Committee to Form has used a variety of methods to reach out to potential families including virtual meetings, phone calls, emails, social media campaigns, videos, targeted messaging, parent interest nights, information tables, and food line distributions, all conducted in both English and Spanish. The application also lists a number of community engagement events, six of which occurred in May and June of 2021.
- The applicant has identified a number of potential partners that could be beneficial to the school and students. Additionally, the applicant was able to provide evidence of additional partnerships that were mentioned during the capacity interview which have been developed since the submission of the application.

Areas of Concern

- The proposed mission of the school is only partially reflected through the application. While the instructional approach, which relies heavily on regularly monitoring student academic performance

to conduct targeted small group instruction appears to align to this mission, alignment is lacking in other areas. For example, the mission specific goals, principal job description, and school culture sections do not appear to fully support the school's mission.

- The narrative and capacity interview do not present a clear picture of how, if at all, the proposal has been shaped to meet the needs of the Spring Valley community that the proposed school intends to serve. During the capacity interview, the Committee to Form spoke generally about parents and families wanting choice and access to after school programming but did not provide specific information regarding the involvement of parents, neighborhood, and/or community members in the development of the plan. Instead, the Committee to Form pointed to several elements of the model that they believed would be beneficial to students such as academically rigorous curriculum, data driven instruction, and intensive teacher training. While the narrative speaks to community engagement activities and references the use of a survey, the application falls short of providing evidence of community input on the proposal.
- While the applicant provided a spreadsheet with over 480 parents and families interested in enrolling their child, many have students in grade levels that would not be offered by the proposed school and all but one has a date stamp from 2020. In response to clarifying questions, the applicant indicated that they had spoken to approximately 150-200 parents during 2021, but provided no evidence of this outreach. The application is lacking evidence demonstrating that the individuals who signed up in 2020 continue to be interested in the proposed school. Additionally, less than half of the interested parents and families reside in the seven target zip codes listed in the application, there is not compelling evidence that the applicant has a thoughtful and intention plan to serve the identified community.
- Many of the letters of support provided by potential partners lack specific commitments and, in some cases, they appear to be outdated raising questions about whether the partnerships are active. In addition, few, if any of the proposed partner appear to be based in the community that the school intends to serve.
- At least three of the partners listed in the application are proposed vendors. When asked during the capacity interview how these potential vendors were selected, the Committee to Form pointed to their experience with Academica Nevada. While it is reasonable for the school's EMO to recommend vendors, the Committee to Form did not describe a process by which these vendors had been vetted prior to signing memoranda of understanding (MOUs). Compounding this concern, a representative from Wallace Stegner Schools, LLC, one of the EMOs, is the signatory on each of these MOUs on behalf of the school. In combination, this raises significant questions about how the Committee to Form has been involved in the establishment of partnerships and how they will vet potential partners and vendors going forward.
- While the narrative provides some information on how the academic program will meet the needs of students with disabilities, at-risk students, and English learners, some portions of these plans are underdeveloped. Additionally, the application is lacking a thoughtful plan for addressing non-academic needs of these student populations, such as social emotional learning, wrap around supports, and trauma-informed care. As a result, the review committee and staff find that the application does not present credible plans to intentionally serve the identified student population and so does not meet the demographic component of the SPCSA's Academic and Demographic Needs Assessment.

Academic Section

The proposed academic program is modeled after the Wallace Stegner Academy school in Utah which has had success in increasing proficiency with a population in which a majority of students qualify for free or reduced-price lunch. The core components of the academic model include efficient and positive classrooms and routines, ability-based groupings, intensive literacy instruction in kindergarten through second grade, daily exit tickets, weekly data/planning meetings, a teacher development and coaching program, and after-school programming. While some portions of the academic plan are well defined, several key components are lacking sufficient evidence and detail to be rated as meeting the standard, according to the SPCSA's application rubric. For example, the plans for the school's curriculum are lacking clarity and there is not sufficient evidence that the academic program would align to Nevada Academic Content Standards. In addition, the plan for serving at-risk students and student with disabilities was lacking detail, raising questions about how the needs of these student populations would be met.

While some components of the academic plan demonstrate alignment to the school's mission, such as the plan for regularly reviewing student data and ability-based groupings to target remediation and support, other components do not appear to support the proposed mission. For example, the mission-specific goals do not address achievement gaps and the plan for school culture and social emotional learning are underdeveloped.

For these reasons, as well as those detailed further below, the review committee and SPCSA staff rated this section as 'Approaches the Standard.'

Areas of Strength

- The application describes a cohesive academic model comprised of efficient and positive classrooms and routines, ability-based groupings, intensive literacy instruction in K-2, daily exit tickets, weekly data/planning meetings, teacher development and coaching program, and after-school programming.
- The narrative describes a robust teacher development program and schedule. Teacher development includes pre-service training, web-based learning modules, twice weekly in-class coaching sessions, weekly feedback meetings, twice weekly data team meetings, and early release days for additional development two to three times per month. In addition, the proposed school's professional development is connected directly to curriculum, instructional goals and processes, and data-driven decision-making.
- The assessment plan includes the use of daily exit tickets with weekly grade team meetings to analyze results, develop reteaching plans, and adjust ability-based groupings, as needed. This approach points to a strong commitment to regularly monitoring student performance and adjusting in response to data.
- The narrative provides detailed information regarding how the proposed school would screen students to identify English learners and how placement decisions would be made. In addition, specific information is provided regarding how teachers would be trained to support English learners in the general education setting, including training on specific instructional strategies.
- The applicant describes extensive teacher training on classroom management and remediating behavioral issues in the classroom. This training addresses key topics including correction versus consequence, private individual corrections, systems, procedures, routines, least intrusive interventions, and positive framing.
- The narrative includes a thoughtful description of the strategies the school will use to reduce truancy and chronic absenteeism including engaging classrooms, daily phone calls to the homes of absent students, home visits, campus principal/parent meetings, and attendance parties for those students who have one or fewer absences

Areas of Concern

- While the narrative states that the proposed school can “change the lives of students in an impoverished neighborhood,” a clear theory of change is not articulated. In addition, while the narrative lists numerous key features of the proposed school, many of them lack a thorough plan for implementation. This concern is compounded by the fact that a school leader has yet to be identified and there continues to be a lack of clarity regarding the role of the Wallace Stegner Schools, LLC, one of the proposed EMOs.
- The narrative states that the bulk of the curriculum has been written in-house and that the proposed school’s leadership team will use the ADDIE model (Assess, Design, Develop, Implement, and Evaluate) to design, deliver, and implement the curriculum. The narrative goes on to list several supplemental resources have been identified for each grade level and content area, many of which are aligned to the common core. However, no information is provided about how the primary curriculum and supplemental materials will be used in tandem. Ultimately, there is not sufficient evidence that the academic program aligns to the Nevada Academic Content Standards.
- The promotion and retention policies are not clearly defined and in some places the narrative appears to contradict other sections. While the application initially states that the proposed school will have a strict policy regarding retention and that students must meet specific performance levels to be promoted, the narrative goes on to say that the determination to promote a student will reflect teacher judgement based on a variety of data sources including tests, assignments, and observation. In some places the narrative indicates that the teacher is responsible for promotion decisions, in other places, the narrative states that the principal will make the decision, and in other places, the application references referral to the “Retention/Promotion Committee” comprised of teacher(s), parents, and a school administrator. Ultimately, the promotion and retention policy as well as process are not clearly defined.
- For students that are at risk of retention, the application briefly states that parents will be notified but does not provide any details regarding the timeline for alerting parents to ensure they can be involved in supporting the student. Additionally, the application lays out two options for students that are credit deficient and one of them, placement testing, and summer credit acquisition is noted as being funded by the family. Given the intent to serve a community in which the majority of students are expected to qualify for free or reduced-price lunch, this raises concerns about barriers to accessing credit retrieval options for students and families.
- The applicant has identified four mission-specific goals based on outperforming the nearest elementary and middle schools in math, reading, and science, as well as achieving lower rates of chronic absenteeism. These goals, however, fail to address closing achievement gaps, a core component of the proposed school’s mission. Additionally, given the low performance of schools in the surrounding neighborhood, it is not clear that achieving these goals would put the school on track to achieving four- or five-star performance.
- The application does not describe a cohesive process for identifying and supporting at-risk students. The narrative states that identification will occur through ability-based groups and evaluation of progress every 4-6 weeks as the method for identification. However, this presents a narrow lens which may be effective at identifying specific gaps in math and reading but may not identify other types of needs. Later in the narrative, there is reference to a referral system which is not fully described. Ultimately, it is not clear how students are identified for response to intervention and how their individual needs would be determined. Additionally, while there is reference to notifying parents and including them as part of the “response team” because there is not clarity about the referral process, the plan and timeline for notifying parents of remediation needs is not clear.
- The plan for evaluating students and developing individualized education programs (IEPs) is lacking

detail. Specifically, the narrative does not take into account assessments and other evaluation materials including those tailored to assess specific areas of need such as cognitive, behavioral, physical, and developmental factors that may lead to a special education identification and need for services. In addition, while the applicant's commitment to inclusion is commendable, the narrative does not account for circumstances where a general education setting may not be appropriate for the student.

- The narrative does not outline a systematic method for identifying homeless students, such as a residency questionnaire. In addition, while the application states that Wallace Stegner has a track record of assisting families experiencing homelessness, no details are provided regarding the plan for identifying needs and ensuring access to services.
- The narrative description of the proposed school culture is very focused on behavior and discipline. During the capacity interview, the Committee to Form and representatives from Wallace Stegner, LLC added some examples of how the school would teach and reinforce key character traits. However, a cohesive plan for norming social and cultural expectations is lacking. In addition, with a mission centered on serving low-income students and students of color, the application appears to be lacking a thoughtful discussion around how the school will develop an intentional culture that supports equity and inclusion.
- The application provides limited information regarding how the school will support students' social and emotional needs. While a referral process is referenced as well as a few strategies that may be employed, the application is lacking a comprehensive approach to supporting social and emotional learning and supports.
- The proposed plan for student discipline lacks detail regarding the strategies and consequences that may be used in response to specific types of student actions. While the narrative mentions in-school suspension, out of school suspension, and expulsion, other consequences are not specifically mentioned.

Operations Section

While the proposed board has demonstrated expertise and possesses a wide range of relevant knowledge, skills, there is not sufficient evidence that the proposed board is currently prepared to fulfill its responsibilities and ensure the success of the proposed school. The application lacks robust governing board goals and metrics for the board to oversee the school. While members of the board made clear during the capacity interview that they would be responsible for holding the two EMOs accountable for delivering services, board members could not clearly articulate what that accountability would look like, raising questions of how the board would hold the EMOs accountable. During the capacity interview, Wallace Stegner, LLC regularly stepped in to provide information regarding academic program. While it is certainly reasonable that the EMO would support with answering some questions, the proposed board did not demonstrate a thorough understanding of the proposed school model.

While the narrative sets forth a reasonable incubation year plan, the timeline for hiring the school principal would likely jeopardize the viability of that plan. Notably, the strategy for replicating the Utah-based model relies heavily on training a principal, but the narrative indicates that unless funding is secured, the principal will not work full-time during the incubation year raising questions about whether this intensive training could in fact be executed.

For these reasons, as well as those detailed further below, the review committee and SPCSA staff rated this section as 'Approaches the Standard.'

Areas of Strength

- The narrative describes ongoing training and supports for the school leader to be provided by Wallace Stegner Schools, LLC. This support includes twice weekly data analysis meetings, weekly on-site coaching and feedback, and quarterly training on the curriculum. The narrative states that the staff of Wallace Stegner Schools, LLC has experience training multiple principals, assistant principals, and coaches.
- The proposed staffing plan appears to be sufficient to implement the proposed school's key design elements, and to ensure that the academic, fiscal, and operational plans are well-executed.
- The applicant describes a multi-prong approach for student recruitment including open houses, grassroots efforts, website and social media, outdoor advertising, direct mail, and community involvement. The narrative also includes a reasonable enrollment timeline and clearly defines the school's admissions process, including staff compliance training. The applicant proposes to use a weighted lottery which would provide additional weight for students qualifying for free or reduced-price lunch. This aligns with the proposed school's focus on serving students in poverty.
- The incubation year plan identifies key milestones for the planning year, as well as concrete actions and accountability for the board, the principal and Academica Nevada. The application also includes a proposed memorandum of understanding for the incubation year between the proposed school and each of the proposed EMOs outlining services that will be provided.
- The narrative provides logical plans for essential services including nursing, facilities maintenance, and safety and security. The applicant intends to participate in the National School Lunch Program to ensure access to free or reduced-price meals for those students who qualify.
- The Committee to Form has identified a temporary facility within the community that the proposed school intends to serve. The temporary facility is a church, and the application includes a signed letter from the president of the church indicating a commitment to work towards executing a lease agreement. The temporary facility has sufficient space for essential school programming and includes classrooms, a cafeteria and outdoor recreation areas.

Areas of Concern

- While the proposed board members bring a range of valuable experiences, there is not sufficient evidence that the proposed board is currently prepared to fulfill its responsibilities and ensure the success of the proposed school. In describing the board's duties, the applicant fails to address several key responsibilities of the governing board including oversight of the school's academic performance and oversight and evaluation of the education management organizations. During the capacity interview, the EMO, Wallace Stegner Schools, LLC regularly stepped in to provide information regarding academic program. While it is certainly reasonable that the EMO would support with answering some questions, the proposed board did not demonstrate a thorough understanding of the proposed school model. In addition, there is a general statement in the application that new board members will receive information regarding the school and open meeting laws, as well as participate in four years of professional development annually, no details regarding board training are included to ensure that meaningful and appropriate training would be provided.
- The proposed board includes two individuals that are affiliated with entities that have a contractual relationship with Academica Nevada, one who is a principal of a school that contracts with Academica Nevada, and one who is a board member of a school that contracts with Academica Nevada. Notwithstanding these individual's qualifications, this raises concerns about the ability of these members to be independent and impartial. While the bylaws provide for recusal in the event of a real or perceived conflict of interest, it is concerning that the board's voting membership would be noticeably diminished for key decisions regarding the EMO. Ultimately, while it may be appropriate for a single member of the board to have a connection to the EMO, multiple members with a relationship to Academica Nevada raises concerns about the board's overall independence and ability to hold the EMO accountable.
- The goals established for the board do not have a clear connection to the school's mission and vision. While they establish expectations for board members in terms of basic knowledge of the school and engagement, many of them are not measurable and do not appear to contribute to the academic outcomes of students. During the capacity interview, the board was not able to articulate how the goals were developed nor draw a clear connection between the goals and the mission and vision of the school
- The job description for the principal position does not directly connect to the school's mission or model. Specifically, the qualifications include a master's degree, previous school leadership experience, and an administrator's license, but fail to speak to experience working with students of color and low-income students as well as a track record of closing achievement gaps. The application is also lacking details regarding how the school leader will be evaluated. While an evaluation tool is provided, details regarding the process for evaluation are not provided. During the capacity interview, the proposed board indicated that they are responsible for evaluating the principal. However, a representative from Wallace Stegner Schools, LLC then stated that they evaluate the principal and then the school's board will decide whether to renew the principal's contract. The evaluation process remains unclear.
- There are some inconsistencies between the staffing plan, budget and organizational chart. Specifically, some positions that are indicated as full time in the staffing plan are funded at only part time in the budget. Additionally, the organizational chart indicates that there will be a director of special education. However, the budget and staffing plans only account for special education teachers.
- The application does not provide a detailed plan for how the school will recruit and hire a staff that is representative of the student body. In addition, the narrative provides a bulleted list of strategies

that may be used to retain high performing teachers, but these strategies are not explained, and details are not provided.

- As noted in the Meeting the Need Section, while the applicant provided a spreadsheet with over 480 parents and families interested in enrolling their child, many have students in grade levels that would not be offered by the proposed school and all, but one has a date stamp from 2020. In response to clarifying questions, the applicant indicated that they had spoken to approximately 150-200 parents during 2021, but provided no evidence of this outreach. The application is lacking evidence demonstrating that the individuals who signed up in 2020 continue to be interested in the proposed school. Additionally, less than half of the interested parents and families reside in the seven target zip codes listed in the application, there is not compelling evidence that the applicant has a thoughtful and intention plan to serve the identified community.
- The incubation year plan assigns key responsibilities to the school principal beginning immediately after authorization, though the hiring plan indicates that the principal would not be hired until February. This raises questions about who will conduct this work prior to the principal being selected. In addition, the application indicates that the principal will not be working full time during the incubation year, unless the proposed school is able to secure startup funds. Given that the model relies heavily on translating the program in Utah to Nevada, it is not clear how the principal would gain the knowledge and experience to lead the school if they are not able to fully participate in the incubation year training that is proposed.
- For the 2022-23 school year the applicant intends to temporarily locate in a church facility that appears to meet the space requirements for the proposed program. While this facility may be suitable, the applicant does not describe how they will ensure that religious iconography is not present in the learning environment. Additionally, the narrative does not provide details regarding the plan for identifying and developing a permanent facility. In response to clarifying questions, the applicant indicated that one potential property has been identified where a school could be constructed. However, the applicant fails to outline plans for securing and developing a permanent facility.

Financial Section

The Committee to Form presents a budget that appears to be based on accurate and conservative projections and in most cases, appears to align to the narrative. The proposed school would contract with Academica Nevada which has a solid track record of supporting charter schools in Nevada with bookkeeping and financial reporting. The majority of schools that contract with Academica Nevada have demonstrated strong financial performance.

The budget, as presented, projects less than a \$5,000 surplus in the first year of operations and when asked about this during the capacity interview, the proposed board provided some general information but was unable to provide specific information about how the school would adjust in the case of a budget shortfall. In addition, the cashflow statement indicates that the school could face a cash shortfall of up to \$212,000 during the first year of operation.

For these reasons, as well as those detailed further below, the review committee and SPCSA staff rated this section as 'approaches the standard.'

Areas of Strength

- The majority of budget assumptions appear in line with the narrative and projections appear to be accurate and conservative. For example, the budget clearly accounts for key operating costs such as contracted special education services, nursing supplies, and audit services. In addition, the budget includes the repayment of the expected start up loan to be provided by Academica Nevada.
- The application clearly defines the board's role in fiscal oversight which was reaffirmed during the capacity interview. In addition, the Committee to Form intends to contract with Academica Nevada which has a solid track record in supporting charter schools in Nevada with bookkeeping and financial reporting. The majority of schools that contract with Academica Nevada have demonstrated strong financial performance.

Areas of Concern

- The budget for the first year projects less than a \$5,000 surplus, which provides a very narrow margin and limited flexibility for the board in the event of unexpected costs. During the capacity interview the applicant team generally explained how they would approach a budget shortfall, but did not provide specific information about how the school would protect mission-critical expenses if faced with budget cuts.
- During the first quarter, the cashflow statement indicates that the proposed school would spend \$212,000 more than would be received from their first per-pupil funding payment. While the cashflow statement indicates that total revenues and expenditures would balance out by the end of the year and that the proposed school would end the year slightly ahead on cash, nothing in the budget or the narrative addresses where that \$212,000 would be coming from.
- There are some inconsistencies between the staffing plan, budget and organizational chart. Specifically, some positions that are indicated as full time in the staffing plan are funded at only part time in the budget.

Addendum Section

In accordance with Assembly Bill 419 from the 2021 Session of the Nevada Legislature, the SPCSA is required to consider the academic, financial and organizational performance of any charter schools that currently hold a contract with the proposed CMO or EMO. Information gathered through the Addendum Section examines the past performance of affiliated charter schools, as well as readiness of the CMO or EMO to expand and the specific services that are to be provided to the proposed school.

The Committee to Form proposes a structure whereby the proposed board would contract with Academica Nevada for primarily operational, financial, and back-office support, as well as with Wallace Stegner Schools, LLC for the academic model. However, the role of these EMOs, in particular, the role of Wallace Stegner, LCC remains murky. It is not clear what specific services this EMO would be responsible for and there are apparent contradictions between the proposed service agreement, the narrative, and some of the responses provided during the capacity interview. Additionally, while the proposed board was clear during the capacity interview that they are responsible for overseeing the EMOs, the process for evaluating the EMOs is underdeveloped. Additionally, the EMO evaluations tools appear to be developed by each of the respective EMOs without input from the proposed board, raising questions about how the board is defining their expectations for these key service providers.

Academic performance data for the Wallace Stegner School in Utah indicates as of the 2018-19 school year, the most recent year where complete school performance data was available, the school demonstrated commendable growth in all tested content areas. In addition, all schools currently contracting with Academica Nevada are in good standing with regard to organizational and financial performance. However, neither of proposed EMOs articulated a process by which they assessed readiness to grow.

For these reasons, as well as those detailed further below, the review committee and SPCSA staff rated this section as 'approaches the standard.'

Areas of Strength

- Academic performance data for the Wallace Stegner School in Utah indicates as of the 2018-19 school year, the most recent year where complete school performance data was available, the school demonstrated commendable growth in all tested content areas. In addition, all schools currently contracting with Academica Nevada are in good standing with regard to organizational and financial performance.
- The scale strategy for Wallace Stegner, LLC is focused on intensive initial training for the school principal as well as ongoing coaching and support. While this approach aligns to the overall proposal and model, questions remain about whether this will be feasible given the timeline for hiring the principal and questions about whether the principal will be able to work full time during the incubation year.
- The application provides proposed service agreements with both EMOs, Academica Nevada and Wallace Stegner Schools, LLC. These contracts provide a reasonable level of detail regarding the services to be provided and each outlines provisions for termination and non-renewal. Additionally, both contracts clearly outline per-student costs for the proposed services that appear to be reasonable.

Areas of Concern

- The narrative fails to discuss how the two EMO's, Wallace Stegner Schools, LLC and Academica Nevada, evaluated readiness for expansion. While performance data for the Wallace Stegner school in Utah do not raise any performance concerns and the majority of schools that Academica Nevada

supports have strong academic, financial, and organizational performance, no information is provided as to the criteria that these two EMOs used to determine that they have the capacity to expand to serve additional schools.

- The application includes an evaluation tool for each EMO, Wallace Stegner Schools, LLC and Academica Nevada. When asked during the capacity interview about the process for evaluating the EMOs, the Committee to Form struggled to provide a coherent overview of their evaluation process. Additionally, both evaluation tools have been provided by the vendors, raising questions about how the board is defining their expectations for these key service providers.
- There continues to be a lack of clarity regarding the role of the EMO, Wallace Stegner Schools, LLC. While the proposed services agreement indicates that the EMO will provide “leadership training and workshop programs” for school administrators on a range of topics as well as access to conferences, trainings and consultation services related to the implementation of the curriculum and best practices, other sections of the application point to the EMO providing teacher professional development and coaching, marketing assistance, and hiring and evaluation of administrative staff. This discrepancy between the contract and the narrative raises questions about the role of the EMO, specifically as it relates to the school principal. During the capacity interview, the proposed board indicated that they are responsible for evaluating the principal. However, a representative from Wallace Stegner Schools, LLC then stated that they evaluate the principal and then the school’s board will decide whether to renew the principal’s contract. The principal evaluation process remains unclear. Finally, during the capacity interview the proposed board and EMO representatives struggled to draw a line between the role of the EMO and the principal. For example, the proposed board members referred to the EMO as “boots on the ground” in the school and described how the principal and the two EMO staff would be on campus helping teachers daily. This lack of clarity also conflicts with earlier sections in the application that asserts that the principal is responsible for the daily operations of the school.
- The initial term of the contract with Wallace Stegner Schools, LLC is five years, which appears to conflict with regulations which state that the initial term of a management contract cannot be more than two years.

Capacity Interview Summary

Based on the independent and collective review of the application, the review committee conducted a virtual capacity interview of the applicant to assess the capacity to execute the application’s overall plan. The capacity interview for Wallace Stegner Academy of Nevada was conducted on Monday, September 20, 2021 and lasted approximately 120-minutes. All but one member of the Committee to Form attended the interview. Additionally, 2 representatives from Wallace Stegner LLC, a potential EMO, and 2 representatives from Academica Nevada, a potential EMO attended the capacity interview. Questions during the capacity interview focused primarily on these areas:

Mission and Vision	
Targeted Plan	Leadership Team
Parent and Community Involvement	Staffing Plan
Curriculum & Instructional Design	Incubation Year Development
At-Risk Students and Special Populations	School Management Contract
Driving for Results	Financial Plan
School Structure: Culture	

Prior to the capacity interview, the review committee sent the applicant team a list of clarifying questions to provide an additional opportunity for details and information to be presented. These responses were considered by the review team and were used to better inform the capacity interview.

Lastly, the capacity interview included a scenario-based question that probed the Committee to Form’s capacity to develop a plan in response to mid-year enrollment, discipline and performance data.

District Input

Per Assembly Bill 462 (2019), now codified in NRS 388A.249, the SPCSA solicited input from the Clark County School District regarding this application.³ The timeline regarding this request for input is below and the response provided by the Clark County School District is attached.

- August 5, 2021 – Memo sent to CCSD soliciting input.
- The SPCSA expects to receive input following the CCSD board meeting scheduled for October 28, 2021. This input will be posted alongside this recommendation.

³ NRS 388A.249(2)(a): “The proposed sponsor of a charter school shall, in reviewing an application to form a charter school...If the proposed sponsor is not the board of trustees of a school district, solicit input from the board of trustees of the school district in which the proposed charter school will be located.”

Appendix (Rubric Detail)

The information below indicates **rubric criteria that the applicant did not substantially meet**.

Meeting the Need

- **Mission and Vision**
 - *Clear and compelling mission statement that is reflected throughout the application.*
- **Targeted Plan**
 - *Clear and compelling rationale for the selected community based on academic or demographic need*
 - *Clear and comprehensive explanation of how the proposed model meets identified community needs*
- **Parent and Community Involvement**
 - *Demonstrates clear evidence of the involvement of parents, neighborhood, and/or community members representative of target population in the development of the plan. The application establishes that the local community has helped shape the final school proposal.*
 - *The Committee to Form demonstrates their ties to and/or knowledge of the target community.*

Academic Plan

- **Transformational Change**
 - *Compelling, well-articulated theory of change and clear educational strategy aligned to the mission and critical to the schools' success*
 - *For all plans the applicant will implement, there are clear, corresponding responsible parties, timelines, delivery methods, and rationales.*
- **Curriculum & Instructional Design**
 - *A clear explanation, supported by evidence, demonstrating how the school's academic program, including the curriculum, aligns to the Nevada Academic Content Standards, including both the Common Core Academic Standards and the Next Generation Science Standards, and that the school teaches all required subjects at each grade level.*
 - *Instructional strategies are proven to be well suited to the student population.*
 - *Plans for professional development show a direct connection to the instructional methods and curricula that teachers will be required to use.*
- **Promotion & High School Graduation Requirements**
 - *Structures are in place to support students at risk of dropping out, including those who are overage for grade, those needing to access credit recovery options, and those performing significantly below grade level*
 - *Graduation/promotion standards for students are clearly defined and measurable, demonstrating high expectations for all students*
- **Driving for Results**
 - *The school's internal, leading indicator goals clearly align to the Nevada School Performance Framework and the Authority Performance Framework.*
 - *Internal and mission-specific framework goals are SMART: goals and objectives are specific, measurable, ambitious and attainable, relevant, and time bound.*
 - *There is a clear process for setting, monitoring and/or revising internal leading indicator academic goals.*

- *The assessment plan is sufficiently detailed to demonstrate collection and analysis of individual student, student cohorts, school level, and network- level performance over time (interim, annual, year over year), including a clear process for setting and monitoring ambitious academic goals.*
- *Demonstrates the validity and reliability of any internal non-standardized assessments, as well as how these assessments are aligned with the school design and high expectations.*
- *Articulates process for utilizing data to support instruction and providing adequate training to teachers and school leaders.*
- **At-Risk Students and Special Populations**
 - *Provides a detailed plan for appropriate professional development to teachers and staff to ensure they can support and accelerate the learning of at-risk and special population students which is aligned to the budget and overall PD plan.*
 - *The Committee to Form provides a clear and research-based process for identifying at-risk students, including those with academic and behavioral needs.*
 - *The Committee to Form provides a logical method supported by research according to which they will assess the needs of at-risk students. The Committee to Form also outlines a continuum of programs, strategies, and supports that corresponds with the needs identified for each student and is supported by research.*
 - *The school assigns clear responsibility for communicating with parents regarding remediation needs.*
 - *The Committee to Form presents a plan for developing IEPs that contain rigorous goals and instructional plans that are suitable to meet those students' goals.*
 - *The group's plan for SWDs must identify the staff members who will lead student evaluations, IEP development, and provision of ongoing service. Relevant job description(s) require(s) the expertise and/or credentials relevant to the services.*
 - *The Committee to Form outlines comprehensive and logical plans to train staff in modifying the curriculum and instruction to address the unique needs of students with disabilities.*
 - *Articulates requirements and processes for monitoring services to students in need and plans to exit students who attain sufficient progress.*
 - *Devotes adequate resources and staff to meeting the needs of all students.*
 - *The Committee to Form presents a logical and systematic method according to which the school will identify homeless and/or migrant students.*
 - *The timeline/plan according to which the school will assess and meet the needs of students identified as homeless and/or migrant demonstrates that students will begin receiving required services within their first semester of arriving at a new school.*
- **School Structure: Culture**
 - *Describes a concrete plan for norming social/cultural expectations at the start of each semester as well as for students who enter mid- semester.*
 - *Well-defined goals around school culture and plans to monitor progress.*
 - *Research-based and age-appropriate strategies to support students' social and emotional needs.*
 - *Dress code and/or uniform policy is age-appropriate, and the applicant articulates how the proposed school will ensure that uniform requirements do not create a barrier for students in poverty.*
- **School Structure: Student Discipline**
 - *Presents sound policies for student discipline, suspension, and expulsion including procedures for due process.*

- Goals for student behavior are clear and measurable; there is a plan, and designated personnel, for monitoring and reporting related to behavior goals as well as ongoing maintenance of discipline records.
- Proposed grievance policy provides reasonable process for parents to dispute disciplinary actions and/or raise complaints.

Operations Plan

- **Board Governance**
 - *Provides plans for meaningful, appropriate training for board members on a reasonable basis. Training is provided by experienced, third parties and contemplates on-boarding for new members, or when the composition of the board changes.*
 - *Goals are clear and measurable, and contribute to improved academic outcomes for students and overall advancement of the organization*
 - *The board puts into place a structure that enables it to collect the information it needs to evaluate the EMO/CMO, if applicable.*
 - *The board articulates a clear, ambitious, data-driven set of standards and criteria that the school leader must satisfy in order to keep the school on track to achieve its vision.*
- **Leadership Team**
 - *Leadership job description identifies qualifications and competencies of the lead person that align with the school's mission and program and demonstrate capacity to successfully manage the school.*
 - *If the school leader is not yet identified, the Committee to Form explains the method by which they will recruit and select a candidate who satisfies the criteria listed in the job description.*
 - *Provides a comprehensive plan for coaching, support and evaluation of school leadership.*
- **Staffing Plan**
 - *Staffing plan matches the proposed budget and is explicitly aligned to both budget narrative assumptions and to budget calculations.*
 - *Sound understanding of staffing needs necessary for the new school(s) proposed.*
- **Human Resources**
 - *Articulates a recruitment and hiring plan that will result in a school staff reflective of the student body.*
 - *School performance management system is likely to retain and promote talented staff, allows for re-structuring and removal of staff as needed, creates opportunities for leadership development, and sets clear expectations.*
- **Student Recruitment and Enrollment**
 - *Demonstrated interest and intent to enroll commitments by a significant number of parents for Year 1. These forms should include the following information at minimum:*
 - *Parent name and contact information*
 - *Zip code of residency*
 - *Student name(s) and grade levels for the proposed opening year*
- **Incubation Year Development**
 - *Outlines the function of any employees in Year 0, as well as the funding source for associated compensation*
 - *The staffing outlined for Year 0 will enable the school to reach its Year 0 milestones and goals*
- **Facilities**

- *If a facility has not yet been identified*
 - *Description of anticipated facilities needs including evidence that the facility will be appropriate for the educational program of the school and adequate for the projected student enrollment*
 - *Inclusion of costs associated with the anticipated facilities needs in the budget including renovation, rent, utilities, insurance and maintenance.*
 - *Evidence to indicate that facilities-related budget assumptions are realistic based on anticipated location, size, etc.*
 - *Assurance that the proposed location will be in compliance with applicable building codes, health and safety laws, and with the requirements of the American with Disabilities Act (ADA).*
 - *Plan for finding a location including a proposed schedule for doing so.*
 - *A clear, time bound plan to engage with local jurisdiction(s) and municipalities.*

Financial Plan

- *The charter Committee to Form protects mission-critical expenses when faced with budget cuts.*
- *School level budget priorities are consistent with the operator's model, including but not limited to: educational program, staffing, and facility*
- *There is no evidence that the school ever will become insolvent or lack access to the necessary amount of liquidity.*

Addendum

- Readiness for Growth

- *Criteria for evaluating readiness for expansion are comprehensive and demonstrate high expectations for academic, financial, and organizational performance.*
- *Evidence is provided that that CMO/EMO is ready to expand according to the articulated criteria for evaluating readiness.*

- School Management Contract

- *Clear, appropriate delineation of roles and responsibilities between the management organization and the school site(s)*
- *Demonstrates capacity and commitment of the governing board to oversee the EMO/CMO effectively:*
 - *Plan for board to monitor/evaluate the EMO/CMO's performance*
 - *Appropriate internal controls guide the relationship*
 - *Describes how the governing board will ensure fulfillment of performance expectations*
 - *Discloses and addresses any potential conflicts of interest (real or perceived)*
- *Length of Contract -A contract's length can greatly influence the board's ability to monitor and evaluate the management's performance. There is a need to balance management company' 's interest in a long-term contract with the school's need for flexibility in changing companies and meeting its fiduciary responsibility and its responsibilities under the charter contract, law, and regulation. Nevada requires that all management contracts must initially be for two years and no management contract can have a term that extends beyond the charter term. A management contract must cease in the event that a school is reconstituted or restarted. Cancellation of a management contract may be a requirement for renewal.*