

Meeting the Need Section

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.

WSAN's mission and vision serve as the foundation of everything that occurs at the School, including its educational model, its anticipated outcomes, and the key supporters and resources that will contribute to the School's success. For example, WSAN knows that in order "close the achievement gap" and guide all students towards academic excellence; they must implement a sound and proven educational model. As such, the key components of the School's educational model are built upon the following proven methods and strategies:

- Academically Rigorous Curriculum
 - Explicit Instruction
 - Implicit and Explicit Academic Vocabulary Development
 - Data-Driven Instruction
 - Ability-Based Math and Reading Classes
 - Positive Learning Environments
 - Highly Structured Classrooms and School Culture
 - Character Development
 - Intensive Teacher Training
 - After-School Programing
 - System-wide Teacher Data and Planning Meetings
- 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.

As detailed on pages 2-11 and 2-12 of the application, WSAN has obtained employed various methods to obtain community feedback as early as May 2020. As might be expected, many of these methods were altered due to restrictions put in place by the COVID-19 pandemic. However, WSAN was able to engage with its target community and obtain feedback through phone calls, virtual parent-interest meetings, in-person informational tables, food lines, and social media events, among others. For a complete list of all of WSAN's community engagement events, please see page 2-13 of the *Meeting the Need (REVISED)* section.

After its first submission in 2020, WSAN respectfully took feedback from the SPCSA to obtain further feedback from the community, which could then be implemented into the development of the school. The

result was a detailed ways to obtain community feedback. The result was a 12 question Google survey that was later distributed to families from WSA's target community. The survey asked respondents a series of questions, such as:

- "How satisfied are you with the quality of the public schools in your community?"
- "If you selected 'Dissatisfied' or 'Very dissatisfied' in the previous question, please provide a brief explanation to your response."
- "To what extent do you feel you have a sufficient number of school options for your child/children in your neighborhood?"
- "What do you believe are the major challenges standing in the way of student success in your neighborhood schools?"
- "What is one thing you would like to see in neighborhood schools that is currently missing?"

To see a full list of all questions and responses, please see [*Attachment 13 – Community Demand \(REVISED\)*](#).

While useful, the data obtained from these questions was varied and open-ended, thus making it difficult to provide cohesive feedback that could actually be woven into the development of the school, especially during its pre-approval stages. For example, when asked, "What is one thing you would like to see in neighborhood schools that is currently missing?" responses included:

What is one thing you would like to see in neighborhood schools that is currently missing?

Less emphasis on student sports, it sounds cruel but the State literally paid for the RAIDERS new stadium w/tax cuts that could've better served the school district. All the schools got out of it was some high schools got new astroturf.

music/ art like i saw in the video

learning to do handwriting

Better programs for kids to express their creativity

Music & arts education

life studies, preparation for adulthood

A Robust program

Enough staff

However, as community feedback is very important to WSA and the school wants to let the community be involved in the development of the school, the Governing Board and future Principal will address these responses as well as future responses through additional community engagement events once the school is approved by the SPCSA.

- 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.

As currently detailed in Table 2-3 on pages 2-13 and 2-14 of the Meeting the Need section, WSAW has employed a variety of methods to reach potential families regarding the school. These methods include both virtual (Virtual Parent Meetings, Phone Calls, Emails, Social Media Campaigns, Videos, Targeted Messaging, etc.) and in-person (Parent Interest Nights, Information Tables, Parent Greetings, Food Line Distributions, etc.) efforts. Additionally, all of these efforts and materials (both virtual and in-person) have been made in both Spanish and English to ensure the information is accessible to all families in WSAW's target community.

Building off the prior year's (2020) community efforts WSAW implement once again a robust community outreach campaign which began in May 2021. These events include the following:

Date	Event	Location	ZIP Code(s)
5/5/2021	Virtual Parent Meeting 2x	Acelero (Spring Valley)	89146
5/12/2021	Virtual Parent Meeting 2x	Acelero (Spring Valley)	89146
6/1/2021	Food Distribution Line	Acelero (Spring Valley)	89146
6/14/2021	Food Distribution Line	Acelero (Spring Valley)	89146
6/14/2021	Parent Interest Night	Mountaintop Faith Ministries	89146
6/15/2021	Parent Interest Night	Mountaintop Faith Ministries	89146
6/20/2021 - Present	Social Media Campaigns	Facebook, Instagram	89102, 89103, 89107, 89118, 89145, 89146, 89147

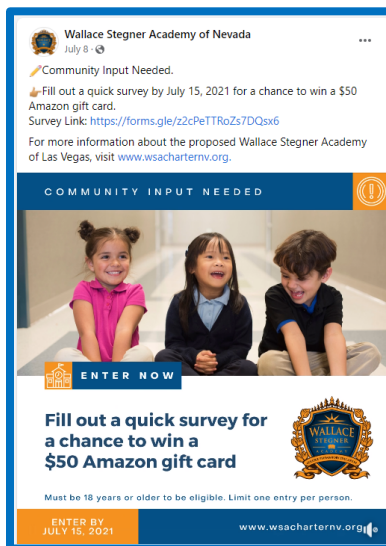
WSAW worked with Acelero at their Spring Valley location to hold a series of 4 separate parent-interest meetings. These meetings were organized by Acelero to provide their current families an overview of how to transition their children to Kindergarten. WSAW asked to join and was able to provide an overview of their school to families as a possible option to families, pending approval from the state charter authority. They also discussed charter schools in general and provided the 12 question survey link to families as well.

Twice during the month of June, WSAW attended food distribution lines near other Acelero campuses. These food distribution lines were created in collaboration with Three Square and WSAW members walked the food distribution lines speaking with families regarding the school and provided flyers, which directed families to the survey. See below for copies of these flyers:



While WSAN changed their facility option from Mountaintop Faith Ministries, the school continued their partnership with the church to house two parent-interest nights during the month of June. These meetings were held to provide families in the community an overview of the school, its proposed opening timeline, and how families can enroll their student once the school is approved by the authorizer.

Furthermore, from June 2021 to today WSAN has continued to engage the community through various social media ads targeted at the community ZIP codes. See below for an example of an earlier targeted Facebook ad:



Lastly, after the application was submitted in July, WSAN held an informational table outside of Smith's Food & Grocery near the school's permanent facility site in 89146 on August 28th, 2021.

Date	Event	Location	ZIP Code(s)
8/28/2021	Informational Table	Smith's Food & Grocery	89146

Below is evidence of Board Member Oyaima Calvo speaking with families as they entered Smith's grocery store:



At all of these events, including social media campaigns, community members were directed to the survey to input their feedback into the application, learn more about WSA, and demonstrate community demand.

- 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.

As detailed on pages 2-15 – 2-17 of the application, WSA had established partnerships with nine organizations at the time of submission. These organizations and the details of their partnership are listed below:

- Acelero Head Start Learning Center, Mohawk Campus
 - Access to Parent Information sessions to market the school and simultaneously provide parents a quality option for their children when transitioning from Pre-K to Kindergarten.
- BEAM for Kids, LLC
 - Providing elementary students an introduction to financial literacy.
- Nevada Health Centers
 - Providing telehealth services to students and families, as well as internships and educational overviews on healthcare jobs.
- Three Square
 - Providing students and families nutritional information as well meals to those who are in need.
- Waterford Early Learning Program
 - Providing families access to early learning programs, a Pre-K-6th Grade Reading Academy, and a Pre-K-6th Grade Mentorship Program, among others.
- YMCA, Bill and Lillie Heinrich Campus (2.4 miles from permanent site)
 - After school programs, such as providing swimming lessons and water safety lessons to families from the school.

Furthermore, WSA was been given a demonstration of support from Senator Keith Pickard, Esq. of the Nevada Senate District #20.

After the application was submitted on July 15, 2021, WSAN continued to reach out to its target community to establish additional letters of support. They obtained an additional 7 partnership letters. These organizations and the details of their partnership are detailed below:

- [Boys & Girls Club of Southern Nevada](#)
 - After-school services as provided by the Club.
- [Drama Kids of Las Vegas](#)
 - Direct after-school drama program, tailored curriculum aligned to WSAN specific themes and goals, and access to classes and camps.
- [Garden Farms](#)
 - Incorporating a school garden program with an outdoor classroom.
- [Heavenly Smiles](#)
 - Mobile dental screenings, cleanings, fluoride varnish treatments, sealant program, oral health education, and oral health supplies.
- [Junior Achievement](#)
 - Providing grade specific programs such as Finance Park and It's My Future, engaging executives and professionals from the community to support and volunteer, connecting the school with existing partnerships
- [Positivelyarts](#)
 - Access to art therapy programs for trauma students and providing master classes in financial responsibility, entrepreneurship, communications, arts education, and philanthropy.
- [thinkLaw](#)
 - Curriculum, professional development and parent workshops

In terms of distance, the following organizations are located **less than a mile away** from WSAN's permanent facility site, (located at the cross streets of Red Rock Street and Edna Avenue):

- Acelero Head Start Learning Center, Mohawk Campus (approx. 2,600 feet)
- Boys & Girls Club of Southern Nevada (approx. 2,500 feet)
- thinkLaw (approx. 4,900 feet)

Furthermore, the remaining partnership organizations and their services provided are not hampered by distance from the school site.

- 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.

After the submission of their application in July 2020, WSAN received the following feedback from the SPCSA:

“The Committee to Form did not seem to have made any progress in developing these community partnerships/relationships and plans since the application was submitted.”

Part of the challenge that WSAW faced during 2020 was trying to establish any sort of partnership with any organization. This was due primarily to the uncertainty surrounding the COVID-19 pandemic and thus many of the organizations WSAW communicated with felt uncertain about entering into an MOU or formal partnership as they were uncertain of how they're organization was to be affected both in the short- and long-term from the global COVID-19 pandemic.

In response to the feedback provided by the SPCSA, WSAW submitted at least four signed MOUs as part of their application submission in July 2021 in order to demonstrate that WSAW had made progress in developing their partnerships. However, as part of this current feedback, WSAW is resubmitting these four MOUs without signatures, please see *Revised WSAW MOUs*.

- 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.

As stated on page 2-1 of the application, the mission of Wallace Stegner Academy of Nevada is to “close the achievement gap for low-income students and children of color.”

The school's proposed community, in the Spring Valley/89146 ZIP code means that the school anticipates serving a student population with the following demographics: 57% Hispanic/Latino, 15% White, 14% Black/African-American, 8% Asian, 5% Multi-Racial, and 2% Native Hawaiian/Pacific Islander. Additionally, data obtained from these same schools shows that 13% of WSAW's target community are on an Individualized Education Plan (IEP), 24% are identified as English Learners (EL), and 78% qualify for Free-Reduced Lunch (FRL) services.

Wallace Stegner's flagship campus in Utah currently has higher percentages of these demographics:

	FRL/ Eco. Dis.	Students with Dis.	ELL	Hisp./ Latino	White/ Cauc.	Multi- Racial
Wallace Stegner (UT)	83%	10%	30%	63%	18%	3%
Targeted Community (NV)	78%	13%	24%	57%	15%	5%

Despite that, the Utah school has demonstrated that it is intentionally serving at-risk students with credible and effective plans and have the evidence of success to back it up.

WSAW will implement these same credible plans as outlined on pages 2-5 – 2-10 of the application.

However, please see revisions on page 2-6 and 2-8 of the *Meeting the Need (REVISED)* section, for plans to address emotional learning, wrap around supports, and trauma-informed care.

Academic Plan Section

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 charter application has an open and fair hiring policy that includes a timeline that will begin *after* approval is granted.

Regarding the ‘lack of clarity regarding the role of Wallace Stegner Schools, LLC, please see revisions made on page 3-33.

- 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.

Please see revisions on page 3-34.

- 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.

Please see revisions on page 3-22.

- 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.

Please see revisions on page 3-22.

Credit acquisition will not take place at WSAN because it will not serve high school students. The Academic Plan now reflects this.

- 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.

Please see revisions on page 3-24.

- 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.

Please see revisions on page 3-34.

- 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.

Please see revisions on pages 3-36 through 3-38.

- 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.

Please see revisions on pages 3-48 and 3-49.

- 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.

[Please see revisions on pages 3-10, 3-17, and 3-18.](#)

- 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.

[Please see revisions on page 3-52.](#)

- 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.

[Please see revisions on page 3-54.](#)

Operations Plan Section

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.

Please see revisions on page 4-1 and 4-6.

- 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 definition of a conflict of interest is "a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity". No board members have a conflict of interest any more than I have a conflict of interest in purchasing a new car because my last one was a Toyota. Not a single board member has ever worked for, or received any sort of payment or benefit from Academica Nevada.

If a board member served on another board that bought a specific curriculum, would that create a conflict of interest in purchasing that curriculum at WSA? No reasonable person would say so. That's the argument being made with this concern.

Also, it should be noted that the board member who is a principal is an employee of a public charter school and he reports directly to that school's governing board, not to a contractor that also reports to the same board.

- 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.

Please see revisions on page 4-9.

- 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.

Please see *Attachment 7 – Job Descriptions (REVISED)*.

- 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 school's first year operates on a tight budget, and like many schools the special education teacher will also fill the role of "special education director" until the school's enrollment (and budget) increases.

- 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.

Please see revisions on pages 4-16 and 4-18.

- 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.

At the time of submission, WSAN obtained more than 480 interest forms (or Letters of Intent to Enroll), with more than 195 coming from the targeted community ZIP codes; which is more than half of their anticipated enrollment for Year 1.

Upon approval from the SPCSA, WSAN will continue to reach out to all families in their interest form data base.

- 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.

WSAN's board will work with it's contracted EMOs to complete operational tasks, hiring, and marketing immediately upon approval.

The principal will begin working in July. Wallace Stegner Schools has trained numerous school leaders and that process always begins July 1st. Without students or teachers, more time isn't needed. This is also why the training of the school leader takes place on a weekly basis throughout the school year when teachers and students are at work.

- 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.

Updated on page 4-33.

Financial Plan Section

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.

WSAN has presented a fiscally conservative budget for their first 6 years of operation. However, if student enrollment is lower than expected, many budgeted expenses will decrease as a result; this includes ESP Fees, student supplies, IT fees, etc.

- 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.

The cashflow statement provided is a very conservative outlook. It assumes teacher salaries are all paid within the fiscal year, even though there will be differences due to teachers being paid over the summer in the next fiscal year. Please refer to *WSAN Internal Cashflow* of Year 1 which includes a more realistic outlook, showing cumulatively no months ending in a negative. The school will work closely with Academica Nevada to ensure timely payments on all activities.

- 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.

The staffing plan and budgeted staff are identical, the staffing plan's numbers are just shown rounded.

- Budget Y1 – 17.5 rounded to 18 on staffing plan
- Budget Y2 – 45.5 rounded to 46 on staffing plan
- Budget Y3 – 58.5 rounded to 59 on staffing plan
- Budget Y4 – 71.5 rounded to 72 on staffing plan
- Budget Y5 – 79 matches staffing plan
- Budget Y6 – 85.5 rounded to 86 on staffing plan

This was due to formatting and was not intended to be different.

Addendum Section

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.

Please see revisions on page 6-1.

- 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.

The Governing Board and the school administration will annually evaluate Academica Nevada and Wallace Stegner Schools, LLC to determine continuation and renewal of services based on their performance.

If either EMO is unable to provide adequate services, each contract provides language for termination between the school and the EMO.

Important to note however, is that both EMOs are invested in the success of the school and intend to exceed all measures of their annual evaluations.

Please see revisions on page 6-6.

- 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 governing board of WSAN will be separate from Academica Nevada and Wallace Stegner Schools, LLC. The role of both Academica Nevada and Wallace Stegner Schools, LLC is to serve at the will of the Board

and as directed by the Board. Academica Nevada will be expected to carry out the defined responsibilities found in their contract in a manner that is consistent and assists the board to meet its vision and mission. Academica's services will include, but are not limited to, the following:

- At the Board's direction, prepare agendas and post notices of all board meetings;
- Assist the Board in locating and securing a school facility;
- Maintain the financial books of the school;
- Assist the Board in creating budgets and financial forecasts;
- Assist the Board in preparing applications for grant funds;
- Assist with school programs (i.e. National School Lunch Program);
- Assist with systems development;
- Assist with procurement of furniture, curriculum, and technology;
- Monitor and assure Compliance with all state reports;
- Assist the Board in identifying and retaining an employee leasing company;
- Assist with student and teacher recruitment (advertising, job fairs);
- Provide human resources related services such as dispute resolution and contract preparation and review; and,
- Assist the Board in renewing the School's charter.

As part of the commitment and relationship between WSAN and Academica Nevada, it is understood and agreed that Academica Nevada will NOT do the following:

- Employ the School Administrator or any other licensed personnel;
 - Draw orders for the payment of money, as that responsibility is limited strictly to the school's board and Campus Principal;
 - Use fees paid by WSAN to benefit or subsidize schools located outside of Nevada; or,
 - Permit the school's lease and management contract to be conditioned upon one another.
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- 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.

Please see [*Attachment 20 – EMO Services Agreement \(REVISED\)*](#) which now reflects two years for the initial term.