

EXHIBIT AA

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March 27, 2017

Mr. Patrick Gavin, Executive Director, Nevada State Public Charter School Authority
Members of Nevada State Public Charter School Authority Board

Re: Responses to "Notice of Intent to Revoke"

To Whom It May Concern,

Please consider any and all documentation submitted to Epicenter in December of 2016 regarding the December 16th Hearing which was continued.

Additionally, a document entitled, "Data Validation NCA 2017" is being submitted to Epicenter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steven Werlein".

Steven Werlein, Nevada Connections Academy

Copy: Laura K. Granier

Data Validation Report

2016 GRADUATION RATE ANALYSIS

Produced for Nevada Connections Academy in response to the State Public Charter School Authority (SPCSA), conducted by Tiberio Garza, PhD.

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Contents

Introduction	1
Purpose	1
Policy Compliance	1
Scope of Validation	2
Objectives	2
Critical Assessment	4
Variables and Calculations under Validation	4
Inferences Evaluated	6
Conclusions	9
Concerns	9
Takeaways	9

Introduction

Purpose

The purpose of this data validation study is to verify the 2016 Graduation Rate Analysis Report conducted by Nevada Connections Academy (NCA). The 2016 cohort graduation rate as reported by the Nevada Report Card is 40.09% and what NCA has stated in their report are revised graduation rates based on new federal law (i.e., Every Student Succeeds Act [ESSA]) and Nevada State law pertaining to students who withdraw to attend a General Educational Development (GED) program or an adult education program not be counted as dropouts for the 4-year graduation rate. In addition to state and federal law, NCA produces revised graduation rates based on students identified in three other categories: post-secondary institution, students in their 5th year, and students with disabilities. In this report, the evaluator critically assesses and examines NCA data and the inferences made in their report based on data.

Policy Compliance

The evaluator is a UNLV faculty-affiliate of the College of Education's Center of Research, Evaluation and Assessment (CREA). It is the policy of CREA to be impartial and merely report the verification of findings free from bias and influence from others. When conducting data validation as a third-party entity strict adherence is taken to ensure credibility, reliability, and trustworthiness in conclusions made by those working under CREA's supervision. This service provided from CREA becomes essential when governing bodies such as the State Public Charter School Authority (SPCSA) rely on the validity of information presented and conclusions made by educational agencies under the SPCSA. Thus, CREA prepares this document for the SPCSA in collaboration with NCA. It is expected that NCA be transparent and timely in

fulfilling all request for data and information in order to provide the SPCSA with reliable, valid, and trustworthy information for their decision-making process.

Scope of Validation

The scope of the validation study was to verify the calculations and inferences made by NCA in their 2016 Graduation Rate Analysis Report. The request for data involved access to both raw and organized data files used to produce the NCA report. NCA also provided a detailed description of how they produced their calculations as well as a complete description of data columns (or variables). Because NCA provided detailed information about what meant what in their data files (i.e., organized data), which were excel files, there were appropriate data protocols used in arranging data for other people – this translated into transparency in graduation rate calculations and data used.

A systematic approach was taken to assess all the data column by column checking for inconsistencies, data entry errors, abnormal values in the data, or missing values that may influence results. NCA provided the following:

- The NCA 2016 Graduation Rate Analysis Report from December 2016, which was updated March 13, 2017.
- A document explaining the graduation rate analysis for NCA 2016 cohort, which were updated March 10, 2017
- 2 data files, which included the raw and organized data,
- A document providing a descriptive account of what was in the data files, specific text explaining variables, and the method taken

Objectives

The objectives were to validate inferences made by NCA concerning their 2016 Graduation Rate Analysis Report. There were two objectives for this validation study. The first objective was to examine and assess the process NCA took to

convert raw data to organized or structured data. The second objective was to assess and examine inferences made by NCA in their 2016 Graduation Rate Analysis Report. In order to verify such inferences made in NCA's report, an evaluation of calculations described in the NCA report had to undergo the process of validation, which meant the assigned evaluator from CREA (i.e., Dr. Tiberio Garza) was to make the same calculations and identify any discrepancies from his calculation compared to NCA's calculation. By calculation(s) we mean all calculations tied to inferences made by NCA. NCA Inferences undergoing validation are found in this document. An added objective by NCA not included in the 2016 Graduation Rate Analysis Report, but included in raw and organized data, was to validate a graduate rate of 62.2%, which was based on 194 non-graduates enrolling into NCA already credit deficient up to one full year ($n = 102$).

Critical Assessment

Variables and Calculations under Validation

The 2016 Graduation Rate Analysis Report conducted by NCA involved first assessing the status of variables in the data files. The background information, which entailed the examination of 15 variables, was first assessed for duplication, missingness, or abnormal entries. Once the variables in the data files were systematically assessed for common data issues the graduation rate was confirmed through the Nevada Report Card (see Table below). The next step involved examining the accuracy of NCA graduation rates reported. Each graduation rate illustrated in the table below was checked to see if the evaluator's calculation matched the calculation presented in the NCA report.

Summary results are provided in the table below as well as the final conclusion in comparing NCA's calculations to evaluator calculations, which are located in the Consensus column. The Consensus column only has 2 choices related to calculations and 2 choices related to verification. For example, for background information the choice was either Accepted or Not Accepted, since it was not a calculation that was being assessed but rather values and their characteristics. For consensus pertaining to calculations, Reached meant equal values were found between the NCA calculation and the CREA evaluator calculation. The alternative to not getting the same value was Not Reached, which meant there was a major discrepancy between the NCA's calculation and the CREA evaluator's calculation that was outside the realm of rounding error. Lastly, the credit deficiency of students was first examined by values in the data files followed by calculations. For that reason, credit deficiency was assessed both by value (Accepted or Not Accepted) and calculation (Reached or Not Reached).

Description–2016 Cohort	Error-type examined	Results	Consensus
Background Information*	Duplication; Missingness; abnormal entries;	All within threshold limits; Missing values was not an issue	Accepted
4-Year Adjusted Cohort Graduation Rate	Verification by Nevada Report Card	40.09%: Same result as NCA	Accepted
Revised Graduation Rates by Student Categories	Proper student allocations to categories	Correct allocation of students to categories proposed	Reached
Every Student Succeeds Act (ESSA)	Calculation; Consistency with other calculations	47.3% graduation rate	Reached
GED/Adult Education	Calculation; Consistency with other calculations	50.3% graduation rate	Reached
GED/Adult Education + ESSA	Calculation; Consistency with other calculations	56.4% graduation rate	Reached
GED/Adult Education + ESSA + Post-Secondary Institution + 5 th Year students + Student with Disabilities	Calculation; Consistency with other calculations	68.0% graduation rate	Reached
Students enrolled all 4 years at NCA	Calculation; Consistency with other calculations	87.5% graduation rate	Reached
Credit Deficiency	Duplication; Missingness; Calculation; Consistency with other calculations	49.7% students; 11% graduation rate among them	Accepted; Reached

Note. *Background Information included the following variables: student population, cohort total, student population credit deficiency, cohort credit deficiency, race/ethnicity, free and reduced lunch, gender, date of birth, grade, year of enrollment, exit status, entry date, exit date, graduates, and non-graduates.

The values for variables in the data were not observed to have values outside their reasoned parameters. In other words, variables that were assessed for their value were in reasonable limitations and did not exhibit abnormality or error in data entry. Nor did the values of variables indicate any misrepresentation or tampering of information. Thus, it is with careful evaluation of variables values I (Dr. Tiberio Garza) must conclude the data as solid and acceptable in moving on to calculations made by NCA.

The calculations of graduation rates produced by NCA did match calculations produced by the evaluator. Graduation rates were based on different student categories and each was found to be accurate, within rounding error was the flexibility in calculations. Thus, I (Dr. Tiberio Garza) have found no fault or misrepresentation of NCA's data calculations. My rationale of the findings is based on inter-rater reliability or assessing NCA's calculations with my own (CREA's evaluator – Tiberio Garza) were the same.

Inferences Evaluated

The following inferences were evaluated because they were statements made by NCA within their 2016 Graduation Rate Analysis Report. These statements were closely examined and assessed for their correctness. The correctness of these statements was assessed through data from NCA both in raw and organized formats. From the data, inferences with calculations were assessed for their accuracy. Based on the inference made by NCA, the inferences were then evaluated on the justification of making such inferences from the data.

- “When Nevada State Law and future federal law are applied, NCA's graduation rate is 56.4% – above the 45% benchmark that was set for 2016.”
- “For students who are enrolled with NCA for all 4 years of their high school career, the graduation rate is 87.5%”
- “Properly adjusting for students who transferred to a GED or adult education program, NCA's graduation rate is 50.3% – above the 45% benchmark that was set for 2016”

- “Properly adjusting for ESSA partial attendance students, NCA’s graduation rate is 47.3%”
- “If all categories of students are excluded (adult education/GED, adjusted diploma, post-secondary institution, 5th-year students, and ESSA partial attendance definition), NCA’s graduation rate is 68.0% –well above the 45% benchmark that was set for 2016”
- “49.7 percent of students in the 2016 cohort arrived at Nevada Connections Academy credit deficient –essentially, 1 out of every 2 students arrive at the school credit deficient”
- “Of those students who enrolled in NCA credit deficient AND did not graduate (194 students), 65% or 126 students withdrew prior to completing all 4 years of high school, but are still counted against the 4-year graduation rate.”
 - “Of those 126 students, 30 students were enrolled less than one quarter and 60 students were enrolled less than one semester of a school year with NCA.”
 - “Most of these students were enrolled at NCA for a small portion of the student’s high school career, yet NCA bore full responsibility for their 4-year graduation.”

Concerning the seven inference and two sub-inferences stated in the 2016 Graduation Rate Analysis Report, I (Dr. Tiberio Garza, faculty-affiliate of CREA) have found the calculations supporting these inferences warranted. The inferences made by NCA are not outside the scope of the data (i.e., raw and organized data). The level of inference described by NCA is factual and not alluding to over-explanation what data is unable to explain. In other words, the evidential statements made by NCA are not detached from the data. There is a consistency of coming back to the graduation rate equation and re-calculating based on different student categories.

Inferences Evaluated outside the 2016 Graduation Rate Analysis

From the same raw and organized data, NCA requested validation of the following inference not explicitly stated in the 2016 Graduation Rate Analysis Report. In other others, this graduation rate estimate was an additional calculation made after the report and was then evaluated by Dr. Tiberio Garza for the purpose of verifying its correctness. This process is also known as inter-rater reliability, meaning NCA produces an estimate and the CREA evaluator also produces an estimate and both entities come together to observe differences.

- “There were 194 non-graduates that were credit deficient upon their enrollment”
 - “54 of these between 2.5 and 4.5 credits behind (at least one full semester behind)”

- “102 of these were 5 or more credits behind (at least one full year behind)”
- “Thus if you define a student of having been dumped as having arrived at least one full semester behind, then that would mean 156 of the eventual non-graduates were dumped. If you remove all of those students from the cohort, we would have had a 62.2% graduation rate and would not be subject to closure.”

Although this was an added estimate (i.e., 62.2%) for validation, the correctness of its calculation and use of 62.2% is within the scope of inferences that could be made by NCA, given the data and the relatedness to other graduation rates described in this report. Thus, I (Dr. Tiberio Garza, faculty-affiliate of CREA) can attest to the proper calculation and representation of this inference being made by NCA in the above statement. The above statement is how NCA framed the inference and what was tested for validity.

Conclusions

Concerns

No concerns or issues were identified in reviewing NCA's raw data files as they were converted to organized data for interpretation. From NCA's organized data, there were no issues identified pertaining to misrepresentation or miscalculation of graduation rates as described in the 2016 Graduation Rate Analysis Report. NCA also complied with CREA's evaluation in being transparent in providing all raw data files and providing detailed descriptions of NCA's method to calculate graduation rates.

Takeaways

A logical and methodical process was taken to assess and examine the creation of the 2016 Graduation Rate Analysis Report by NCA. CREA assigned Dr. Tiberio Garza to assess and examine NCA's 2016 Graduation Rate Analysis Report. Dr. Garza assessed all raw data files that created the 2016 Graduation Rate Analysis Report for validity and possible errors related to data entry or misrepresentation. The conclusion after examining NCA's data files, supporting documents, and calculations for the 2016 Graduation Rate Analysis Report is NCA's report is valid and warrants attention to what inferences are made in the document. The only inference made by NCA outside the scope of the 2016 Graduation Rate Analysis Report was the assessment of the additional inference (please see *Inferences Evaluated outside the 2016 Graduation Rate Analysis* section), which did warrant the validity of such a statement after examination.