

# Winter Cycle 2017 Charter Application Review

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*American Leadership Academy Summerlin*

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# Summary of Application Section Ratings

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

- Section 1: Executive Summary
  - Approaches the Standard
- Section 2: Meeting the Need: Targeted Plan
  - Approaches the Standard
- Section 3: Parent and Community Involvement
  - Approaches the Standard
- Section 4: Academic Plan – Mission & Vision
  - Approaches the Standard
- Section 5: Transformational Change
  - Does Not Meet Standard
- Section 6: Curriculum & Instructional Design
  - Approaches the Standard
- Section 7: Distance Education
  - Not Applicable
- Section 8: Pre-K
  - Not Applicable
- Section 9: High School Graduation Requirements
  - Not Applicable
- Section 10: Driving for Results
  - Approaches the Standard
- Section 11: At-Risk Students and Special Populations
  - Does Not Meet Standard
- Section 12: School Structure: Culture
  - Approaches the Standard
- Section 13: School Structure: Student Discipline
  - Approaches the Standard
- Section 14: School Structure: School Calendar/Schedule
  - Approaches the Standard
- Section 15: Day in the Life & Scenarios
  - Does Not Meet Standard

- Section 16: Operations Plan– Leadership Team
  - Does Not Meet the Standard
- Section 17: Operations Plan– Leadership for Expansion
  - Does Not Meet the Standard
- Section 18: Operations Plan – Staffing
  - Does Not Meet Standard
- Section 19: Operations Plan – Staffing
  - Approaches the Standard
- Section 20: Operations Plan – Scale Strategy
  - Approaches the Standard
- Section 21: Operations Plan – Student Recruitment and Enrollment
  - Approaches the Standard
- Section 22: Operations Plan – Board Governance
  - Approaches the Standard
- Section 23: Operations Plan – Incubation Year Development
  - Approaches the Standard
- Section 24: Operations Plan – School Management Contracts and Services
  - Does Not Meet the Standard
- Section 25: Operations Plan –Services
  - Approaches the Standard
- Section 26: Operations Plan – Facilities
  - Approaches the Standard
- Section 27: Operations Plan – Ongoing Operations
  - Meets the Standard
- Section 28: Financial Plan
  - Approaches the Standard

# Application Overview

## *School Name & Proposed Governance Structure*

American Leadership Academy- Summerlin is a leadership school replication of a high performing model, American Leadership Academy, currently in operation in Arizona. The current Committee to Form, the proposed Board of American Leadership Academy (ALA), intends to contract with Charter One Education Group, LLC (COEG) to provide school management services and to ensure that the same high level of achievement, or greater, is obtained in Nevada.

## *Mission (Application I t e m A .1 .2)*

American Leadership Academy Summerlin is a K-8 charter school seeking to emphasize academic excellence, leadership development, patriotism, and provide a “moral and wholesome environment.” ALA Summerlin utilizes a traditional school pedagogy based on the Core Knowledge Sequence and a strong liberal arts core. ALA Summerlin is a replication of a high performing charter school model established in Arizona. The mission of ALA Summerlin is to “provide the best educational experience to as many students as possible in a moral and wholesome environment.” The vision of ALA Summerlin is to “Learn. Lead. Change the World!” At ALA Summerlin, students will learn the leadership habits and skills necessary to assume roles and responsibility in school, careers, community and family. Students will also learn that Servant Leadership (as explained in Steven Covey’s 7 Habits of Highly Effective People) is the highest form of leadership and students are encouraged to provide meaningful service to their families and communities.

## *Proposed Location (from Charter Application Cover Sheet)*

As the name implies, the school is proposing to operate in Summerlin, Nevada in unincorporated Clark County.

## *Enrollment Projections (from the Charter Application Cover Sheet)*

The applicant intends to open in 2018-19 serving 990 students in Kindergarten through 8th grade. The school will enroll 120 students in grades K through 5th and will enroll 90 students in each of the middle school grades. In each subsequent year, the applicant projects it will serve 120 students in each grade, for a total student population of 1,080 K-8 students.

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
<b>K</b>	120	120	120	120	120	120
<b>1</b>	120	120	120	120	120	120
<b>2</b>	120	120	120	120	120	120
<b>3</b>	120	120	120	120	120	120
<b>4</b>	120	120	120	120	120	120
<b>5</b>	120	120	120	120	120	120
<b>6</b>	90	120	120	120	120	120
<b>7</b>	90	120	120	120	120	120
<b>8</b>	90	120	120	120	120	120
<b>Total</b>	<b>990</b>	<b>1080</b>	<b>1080</b>	<b>1080</b>	<b>1080</b>	<b>1080</b>

## Overview

The Recommendation Report for American Leadership Academy Summerlin is a summary of the evidence collected by the State Public Charter School Authority (SPCSA) through its interviews and dialogue with the applicant group, review of the school's Charter Application Proposal along with an analysis of performance data for other charter schools implementing the same academic model.

A recommendation to approve a charter for a six-year period is based on a comprehensive review of the proposal, performance data for replicated schools, the applicant capacity interview, follow-up discussion with applicants, and - where possible - site visits, guided by three essential questions:

1. Will the academic program be a success?
2. Will the school be an effective and accountable organization?
3. Will the school be fiscally sound?

# Recommendation

## *Overall Recommendation*

### Recommendation to Approve – with conditions to be addressed prior to the execution of a Charter Contract. External reviewers rate the overall application as “Approaches the Standard”.

The Agency determined that American Leadership Academy – Summerlin either “Approaches the Standard” or “Met the Standard” in the majority of areas in the initial application process. For applicants seeking to replicate an existing model—whether as a direct charter management organization applicant, a committee to form partnering with a non-profit or for-profit education management organization, or a committee to form which seeks to independently replicate, primary consideration must be given to the academic track record of the model along with the organizational and financial track record of the operator.

American Leadership Academy’s Arizona schools were all rated at either the A or B level on the state’s 2017 preliminary letter grades. This performance is consistent with that of previous years. In 2014, the last year when Arizona issued letter grades prior to this fall, three of the five ALA campuses eligible for school grades were rated at an A level; the other two were classified at the B level.

Based on the Agency’s review of the academic portion of the current charter application, staff identified several deficiencies that must be remedied prior to execution of the charter contract, including concerns related to the effectiveness of the program, as described in the narrative, to fully meet the academic needs of struggling learners, students with individualized education plans, and students who are English Language Learners. Much of this concern was based on the limited instructional expertise of the proposed school leader and the lack of program-specific expertise on the proposed board. It is important to note that while this academic model is currently being implemented in Nevada, the existing American Leadership Academy school in Nevada is in its first year of operation and has not yet participated in state testing or received a star rating under the Nevada School Performance Framework. Replication of academic models across state lines is not an exact science: not every replication of a high performing model in a new state will result in the same level of performance in the new geography. Given this uncertainty, an essential component of this approval recommendation is that the applicant and the educational management organization agree to limit applications and amendments seeking future expansion beyond this school and the existing ALA school in North Las Vegas until both schools have at least three years of performance at the three star level or higher on the Nevada School Performance Framework.

The Arizona State Board for Charter Schools classified American Leadership Academy as Meets Board’s Financial Standards on the 2014, 2015, and 2016 evaluations of the network’s financial performance based on its independent audits. The state’s review of the network’s 2017 financial performance is currently pending. In the financial plan, the noteworthy areas of concern included mismatched information within the narrative, a high EMO fee, and capacity questions about the limited school finance expertise of identified members of the leadership team.

The Arizona authorizer classified ALA as Meets Board’s Operational Standards in its 2014, 2015, 2016, and 2017 evaluations of the network’s organizational performance. The proposed members of the Board of ALA-Summerlin are Greg Carlson, James Jack Leavitt, Patrick Davis, Susann Clearwater, and Christiana Posner. Gabe Shirey will act as the Executive Director of American Leadership Academy Summerlin. For the first year of operation, the Executive Director may also act as the Director to save costs.

The proposed EMO will work with ALA Summerlin to assist on academic programming. The EMO employs two chief academic officers for American Leadership Academy Arizona, Mrs. Chelsey Griess and Mr. Stephen Trejo. Both Mrs. Griess and Mr. Trejo will advise and assist ALA Summerlin with academic programming as they have the requisite skills and expertise. As noted later in this document, staff recommends that this approval be conditioned on the school budgeting for and identifying an instructional leader in the pre-opening phase and the first year of operation to supplement Mr. Shirey's non-academic talents with additional expertise in teaching and learning and the school's unique academic program.

In the organizational plan, the noteworthy deficiencies included an unclear organizational chart that did not adequately explain the reporting structure for both EMO employees and employees of the school, an unclear plan to effectively recruit and train a large staff to adequately serve a large school, and the outreach methods to recruit students. Notably, the existing American Leadership Academy campus, which is in its first year of operations, has special education, English Language Learner, and free and reduced priced lunch populations that are significantly lower than either the closest zoned district school or the other traditional public schools that students would have otherwise attended based on their home addresses. To address this discrepancy, this approval recommendation is also predicated on a condition that this charter school conduct an inclusive marketing and outreach campaign and implement a weighted lottery annually to ensure a more equitable representation of these three under-represented populations.

Based on staff's evaluation, the concerns identified in the review of the application can be addressed administratively via conditions that must be addressed to the satisfaction of staff prior to execution of the charter contract.

Charter School success starts with three basic facets: an academic plan that challenges students and allows for their success; an organizational plan that grants teachers and staff of the school professional development and training opportunities building upon current skill sets allowing them to develop the tools necessary to serve the student population; a solid financial plan that takes into account current and future economic forecasts and minimizes risk.

Per adopted regulations, the SPCSA may specify additional conditions when approving an application to form a public charter school pursuant to Section 9(1) of R08916A. To address the technical deficiencies identified in the application and ensure that the proposed charter school meets the criteria set forth in the Authority's strategic plan, staff recommends that approval of this application be granted contingent to the applicant satisfying all concerns and conditions identified in this recommendation report to the satisfaction of staff.

Additionally, the proposed contract between ALA and COEG as outlined in Attachment 23 has a number of deficiencies that do not meet the statutory requirements under NRS 388A.246.

Lastly, the SPCSA is requesting clarification and/or additional information provided in the following areas which may meet statutory requirements, but lack sufficient detail at this time:

- Evidence-based research that the proposed academic program, including the RAISE program, PBIS, physical education, art, and the proposed schedule for remediation has been successful in producing strong outcomes among students from various subgroups and the specific programmatic modifications that have been made to improve student achievement in each high need subgroup.
- Evidence that Core Knowledge and Saxon, as implemented at this charter school, are properly aligned with the Common Core and Nevada State Standards via a Nevada-specific scope and



sequence and curriculum alignment.

- A detailed plan and approach for working with parents, the EMO, and additional community stakeholders to ensure the recruitment of a representative student population. Additional written evidence that there is sufficient support to fully enroll the school with a population representative of the diversity of the surrounding community in the form of written surveys, written sign-in sheets to community forums, and signatures collected via door-to-door canvassing in the target community is also necessary.
- A clear explanation of how the proposed school would meet the needs of the target community, as well as more information on the proposed school leader, the proposed instructional leader, and their experience in working with a similar demographic.
- A revised plan for interim assessments, both formative and summative, given the current requirements under the SPCSA performance framework.
- A more detailed discipline and policy for all students.
- A thorough description of how the mission informed instruction, daily activities and classroom experiences.
- A revised school calendar and schedule that meets requirements as set forth by the state of Nevada.
- The qualifications and hiring timeline for a School Leader and Academic Director (instructional leader), and the measures implemented by the Board to hold them accountable.
- A revised organizational chart that shows the reporting structure to the local board as well as the EMO.
- The qualifications and hiring timeline for instructional and operational staff.
- A thorough rationale for the salaries for staff, both novice and experienced, that fits within the estimated budget.
- Details on the partnerships with universities and colleges to support the initial staff model and growth to full-scale.
- Revised facility and financial projections to ensure that the school is sustainable and has performed due diligence on possible facility options.

Responses (or cures) for the above deficiencies and concerns should be submitted, in writing, to the SPCSA within 60 days of this recommendation (on or before February 6, 2018). SPCSA staff will then review the proposed changes, determine if all conditions have been met or if additional revisions are necessary prior to execution of the charter contract.

### ***Final Analysis***

This CTF showed passion with regard to their proposed school, but would benefit from additional capacity via an open and public recruitment for additional members to round out the perspectives, expertise, and experience level of the governing body. As a proposed public entity that has the unique privilege of self-selecting its own governing body, this level of public transparency is essential to ensuring accountable and effective governance. As noted previously, governance and general charter school training that is independent of the EMO is also an essential element. This issue must be addressed to the satisfaction of staff as a condition of approval.

## ***Rating Standards***

### **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.

# Executive Summary

Approaches the Standard

## *Areas of Strength:*

- The school's vision is well described, as are the key components of the educational model. ALA Summerlin's vision for students to learn, lead, and change the world sets a nice context for school culture, and student expectations around learning. The applicant explains that the proposed school will get ahead of the additional 9,000 homes being built in the area, and therefore, will meet the expanding needs of the target community.
- The applicant describes the proposed academic model as classical education infused with developing students' leadership habits and skills necessary to assume roles and responsibility in school, careers, community and family. The mission of ALA Summerlin is to provide the best educational experience to as many students as possible in a moral and wholesome environment. The school will operate as a "learning organization" which means that ALA Summerlin leadership and employees will always be learning about and looking for innovative tactics, techniques and procedures to improve every aspect of its operations. Both the model and mission aim to be unique to the Summerlin community and offer a distinct, quality choice to students and families.
- The applicant provides compelling evidence that choice options are needed due to the underperformance of area district schools.

## *Areas of Concern:*

- The expected outcomes, as presented, were not measurable (e.g., contributing citizenship and self-discovery) and few, if any, benchmarks were included. The applicant mentioned cognitive and social skills, but did not include measurable objectives. It is unclear how the school's board will be able to determine whether the school is achieving its mission and making adequate progress towards meeting its objectives. The applicant provided no evidence that the evaluative tools and performance targets were predictive of performance on either the Nevada School Performance Framework or the Authority's academic framework. Consequently, it is unclear if the applicant's goals effectively supplant those applicable to all traditional public and public charter schools. The applicant must substantially revise these goals and explain how it will ensure full alignment with the expectations of the State of Nevada.
- In the Executive Summary, and throughout the application, the applicant indicated that the selected academic program – Core Knowledge and classical education – would close achievement gaps, and accelerate learning. Since students in this community outperform others across the state, on the face of it, this may be an invalid assertion. However, had the applicant indicated that its program is specifically designed to improve performance among students from various sub-groups, and provided evidence-based research that these academic models have been effective in doing so, the claim would have more weight. This is especially important given that the applicant has selected an EMO and a model which produces limited to mixed results in the most recent [CREDO study](#). This must be revised throughout the application as a condition of approval.
- Other than the EMO, the applicant did not identify key community or other resources to support families, and students' academic and nonacademic needs. Furthermore, there was not convincing evidence that

supporters other than COEG and Schoolhouse would be actively engaged in the school's success ([page 9](#)). This must be revised as a condition of approval.

- The executive summary did not sufficiently explain how the proposed school would meet the needs of the target community. Information on the proposed leader, their approach, values and accomplishments, were not included as required. This must be revised as a condition of approval.
- While the applicant is attempting to replicate a model that has been successfully implemented in the past, it is not a perfect comparison. More information is needed to evaluate the likelihood of success this school might have in the proposed community. This must be revised as a condition of approval.

# Meeting the Need

## Approaches the Standard

### Areas of Strength

- The vision is fairly well described and both the vision and mission are both consistently described throughout the proposal. The applicant demonstrated an understanding of and enthusiasm for this mission and vision during the interview.
- The applicant reiterates a clear and concise mission throughout the proposal, and defines the school's purpose to develop leaders through an infusion of classical education and leadership development. The applicant communicates the proposed school's value well, indicating that it will alleviate projected overcrowding at area schools due to a new factory and housing being constructed in the area. In an effort to serve the whole child, ALA Summerlin students will participate in various leadership activities, and staff incorporates leadership and accountability goals into the school day, classrooms and community service. This is very compelling, and speaks to the need for more quality options in the Summerlin community.
- The applicant collected community input via a Facebook page, a January 2017 community meeting, a 2015 parent petition, and from parents standing in line at a Regal cinema. To ensure parents remain connected to the school, ALA Summerlin will provide frequent communications, encourage community service hours, encourage parent involvement in homework, host several on-campus events during the school day, and provide parent training opportunities. This signals that there is some support for this school and model in the Summerlin community.

### Areas of Concern

- The mission was weakly linked to key design elements. The description of how the mission informed instruction, daily activities and classroom experiences should be more robust, direct, and specific ([page 22](#)). This must be revised as a condition of approval.
- The targeted community section of the application was inconsistent. For example, the chart on [page 11](#) was exactly the same as the chart in the ALA Centennial application, which may be because it is for the county as a whole. However, it did not match the data presented in Mr. Shirey's statement on [page 18](#) describing the target community, which included a much higher FRPL rate in particular, which was also attributed to Clark County. Therefore it was unclear whether the CTF knew their target community well enough at the time the application was submitted. This must be revised as a condition of approval with presentation of more specific and targeted data and analysis of demographics and performance at the school zone and census tract levels.
- The definition of a "varied" ([page 10](#)) or "diverse" ([page 11](#)) enrollment was not included, and left questions and concerns about whether and how the enrollment may be engineered to fit a certain student at the expense of others. Furthermore, plans describing parent responsibilities and values potentially could be used to limit the student body and exclude harder to serve students with less engaged parents. For example, requiring parents to sign a planner daily could be a problem for certain students ([page 17](#)) and punishes a child for the actions of an adult. The parent service requirement similarly may restrict or self-select enrollment to a higher socio-economic demographic. This must be revised as a condition of approval.

- The application would be strengthened with more information about what Clark County School District actions were “offensive” to families ([page 12](#)), and how the ALA Summerlin school will avoid those same problems. Additionally, more details about the district’s plans to serve a growing community, and why those plans are inadequate is essential. This must be revised as a condition of approval.
- In general, the application lacked definitive evidence that the school would be able to serve all students from the target population, as the application appeared to be crafted with a more engaged/advantaged segment of the potential student population in mind. This must be revised as a condition of approval.
- Letters of support did not include strong evidence of community demand, with the exception of Kindercare. No parent letters, evidence of the conversations mentioned in the narrative, etc. that a cross-section of the community wanted the school were included. This must be addressed as a condition of approval.
- It was unclear as to whether the applicant had a deep enough understanding of the needs of special student populations. For example, the applicant indicated that 35% of students will be eligible for FRL. This would mean that a significant percentage of families whose children would attend the proposed school are likely to receive human services and benefits from area public and private agencies. The applicant did not identify, make connections, or state that strategic alliances with these agencies would be beneficial. This was verified during the applicant capacity interview. Additionally, the EMO’s current track record in the State of Nevada does not support the idea that this school will be able to recruit a representative population. Notably, the new American Leadership Academy serves dramatically less students than its local schools. This must be addressed via a detailed, grassroots marketing plan that demonstrates how the school will meet the expectations of NRS 388A.453(3) and a revised enrollment policy which includes a weighted lottery satisfactory to staff. as a condition of approval. The imposition of the weighted lottery policy is contingent upon the Legislative Commission approving R131-16P or a similar regulation identified by staff that relates to weighted lotteries prior to the commencement of the statutorily mandated marketing and enrollment windows.
- There was little evidence of community involvement in the development of the school proposal beyond the founding team members and a few public figures and business owners ([page 15](#)). The one public outreach session held seemed to provide more information and feedback, and perhaps should be repeated often in the community to reach more potential parents – 84 participants is a great turn out for one meeting but is nowhere near the number of seats that will be chartered ([page 15](#)). This must be addressed to the satisfaction of staff as a condition of approval.
- The Parent and Community Involvement section of the application did not describe a robust and formalized feed-back loop for parents. There is more description on how the school would communicate to parents, which is important ([pages 17-18](#)) but not a lot of detail about how parent and student and community input would be routinely gathered and considered. This must be addressed to the satisfaction of staff as a condition of approval.
- Parents appear to have a limited role in school decision-making (e.g., plans to include parents on the board or developing a PTA). This must be addressed to the satisfaction of staff as a condition of approval.
- This portion of the application, like others, contains general statements – most of which are admirable goals – but lack detail. It appears the applicant has attempted to overlay a “template”

of sorts onto this community without exploring in detail the specific needs and parameters of this community. This must be addressed to the satisfaction of staff as a condition of approval.

***Specific Subset Ratings in the Academic Section (For Reference)***

- Targeted Plan
- Approaches the Standard
- Parent and Community Involvement
  - - Does not Meet the Standard

# Academic Plan

Approaches the Standard

## Summary

The mission of ALA Summerlin is to "provide the best educational experience to as many students as possible in a moral and wholesome environment." ALA Summerlin plans to deliver academic excellence, and provide meaningful extra-curricular activities for students in athletics, the arts, technology, entrepreneurship and leadership. ALA Summerlin's values will be the foundation of its mission and vision. ALA Summerlin will RAISE leaders through Respect, Accountability, Integrity, Service and Excellence. RAISE values allow employees to judge the importance, value and attractiveness of any given situation, and prioritize decisions independently and consistently to the school's mission and vision.

ALA Summerlin will provide instruction on leadership through the use of The 7 Habits of Highly Effective People developed by Stephen R. Covey, traditional literature, ALA's RAISE leadership manual, and other leadership texts. ALA Summerlin recognizes servant leadership as the highest form of leadership. ALA Summerlin seeks to develop servant leadership through civic engagement, including community service. Students at ALA Summerlin will provide 10 hours of community service throughout the school year in order to develop servant leadership and engage their community. ALA Summerlin seeks to provide over 10,000 hours of community service each year.

Again, like many parts of the application, the applicant's academic plan lacks some specific details found in other successful charter schools. The applicant's academic plan appears to be a template that the EMO has used from other ALA schools. This is problematic, given the significant differences between Arizona and Nevada in areas of law, regulation, policy, and student and family needs. The SPCSA would like to see requires more details in a number of areas as outlined below. Additionally, SPCSA believes that the applicant would benefit from hiring and instructional leader with an educational background steeped in instructional models for students in grades K-8.

## Areas of Strength

- Curriculum nights and parent training opportunities are nice features ([page 18](#)) and the marketing plans and social media approach to connect with the community are clear. In order to shine as a strength, the applicant team could connect this idea to the academic plan and include more details about execution ([page 20](#)).
- The applicant describes the proposed curriculum (e.g., Core Knowledge, Traditional Roots, Writing and Rhetoric, Hake Grammar, Saxon Math, HMH Science Fusion) well, and notes that it has been successful in other schools contracting with the EMO. The applicant provides a clear promotion policy and plan for matriculation. The applicant provides a clear and concise description of the instructional strategies (explicit instruction and shared inquiry) that will be employed including ([page 33](#)), but not limited to focusing on critical elements, using clear and concise language, requiring frequent responses, providing distributive and cumulative practice. The applicant adequately describes the role of the SST to provide in-class and pull-out interventions. The applicant also admirably describes the approach to differentiate instruction for struggling and gifted learners, and students with disabilities.
- The applicant includes state-mandated assessments in both its goals and stated measures thereby



providing a response that demonstrates founders' clear understanding of the obligation to participate in these testing programs. The proposed school's plan to invest parents and students to achieve full participation in state-mandated assessments includes:

- detailing the assessment plan on the school's website
  - teacher communication via telephone and in-person conferences and notes sent home
  - parent newsletters, which will ensure parents are aware of student progress and areas for growth.
- The applicant also describes internal formative assessments (e.g., DIBELS, Galileo, Core Knowledge and Saxon Math unit exams), and distinguishes these tests from state-mandated exams. The applicant indicates that the process for setting, monitoring and/or revising internal goals will be addressed during grade-level and PLC team meetings. The choice to administer the ACT ASPIRE as an additional interim assessment in addition to the ASPIRE's annual summative assessment will provide a norm for grade-level performance that is directly aligned to the Authority's performance framework. This in turn will keep students, teachers and parents informed of progress and areas to improve. The applicant provides information regarding staff PD designed to implement the proposed content, instructional strategies, student assessments and data review.
  - The applicant describes a tiered model of support for struggling learners, ELL's and students with disabilities. At-risk students will be identified during the enrollment process. Upon enrollment, the proposed school gathers additional information via applications, forms, and a baseline assessment. Students identified with possible risk factors are reevaluated via a 45-day screening process after the baseline. Therefore, the applicant describes strong and reasonable processes for identifying at-risk students, (those with disabilities, those learning English, those who are homeless or migrant); the use of requisite assessments to identify and demonstrate growth, executing parent communications, and compliance-related supports to be provided these students. Similarly, the applicant provides a compliant response to staffing and recruitment to meet the needs of students with additional learning needs. The applicant discusses parent training for those families with children who have disabilities.
  - The applicant articulated a desire to serve all students and a dedication to establishing a school that will be diverse and inclusive.
  - The applicant presents a very comprehensive parent grievance policy. The policy as described puts students and families first, and provides a blueprint for staff regarding how to treat and partner with parents. The applicant also presents a progressive disciplinary policy for student infractions, suspensions, and expulsions. The applicant indicates that all disciplinary actions up to the level of expulsions are administered by the teacher.
  - The applicant provides a comprehensive table ([page 77](#)) detailing how students will spend their time, and the schedule supports the academic program as described. Instructional time for core academic subjects and specials is compliant with the requisite 180 days of instruction. The applicant indicates a goal of 95% attendance, and will track attendance via the student information system.

### **Areas of Concern**

- While the applicant identifies that it plans to use the ACT ASPIRE as an interim assessment in

8th grade, the applicant fails to recognize that the Authority has mandated the ASPIRE's annual assessment for students in grades 3 through 12 as a component of the Performance Framework since 2015. This must be addressed to the satisfaction of staff as a condition of approval.

- The applicant could have bolstered the application had they also provided data to substantiate the need they clearly described in the application. For example, a list of petition signatures would have added credibility to the application. Furthermore, it could have also provided evidence of the applicant's intent to serve students both inside and out of the immediate Summerlin community and demonstrated that the applicant sought to attract a cross section of the community, pursuant to NRS 388A.453(3).
- Based on the most recent CREDO report, the performance data from ALA's Arizona schools did not instill confidence that ALA would reduce the achievement gap. While the State of Arizona's preliminary data indicates that all ALA schools performed at the A or B level during the current year, the performance of those schools on the CREDO study merits caution. As the applicant asserts that this improvement is a direct consequence of programmatic changes introduced since the last time Arizona issued letter grades and submitted academic data to CREDO, approval must be contingent upon this applicant and the proposed EMO or any EMO that replaces the proposed EMO agreeing that none of those parties will submit or agree to participate in the submission of a charter application or expansion amendment until such time as ALA Summerlin and all other schools supported by the proposed EMO or any replacement EMO have achieved NSPF ratings at the 4 star level for two consecutive ratings.
- The applicant provided insufficient details regarding a key design element: the leadership development framework or RAISE program. The applicant indicated that RAISE "provides a common language and paradigm from which to discuss one's own behavior and the outcomes associated with said behavior." More information about how RAISE provides context and encourages students to set SMART goals would have been relevant and helpful. This must be addressed to the satisfaction of staff as a condition of approval.
- While leadership development is a key component of the ALA model, no rubrics outlining the standard for student work quality or other metrics were provided other than the mention of SMART goals. Since the applicant did not describe exactly what leadership development components would be measured (i.e., memorizing 7 Habits, etc.), the proposal did not include an adequately coherent description of what the school would look like when students achieve leadership qualities. In addition, the application did not include a clear description of the school's performance management policies, practices, systems or detail about using student performance data. This must be addressed to the satisfaction of staff as a condition of approval.
- The proposed school's design principles were loosely based on a theory of change (TOC). It was unclear as to whether the applicant understood the theory of change concept, since no TOC was included in the proposal. Little to no current evidence-based information was provided regarding teaching, learning, and how student performance data would be used to improve program, practice and student performance. The academic model described did not include a rigorous or comprehensive performance management approach, and therefore, raises questions about subgroups of students achieving double-digit gains. This must be addressed to the satisfaction of staff as a condition of approval.
- The applicant indicated that the Summerlin instructional program would be accessible to a diverse group of students. However, no information regarding how the school would address accessibility, equity or struggling learners (other than referral to the SST) was provided. This

must be addressed to the satisfaction of staff as a condition of approval.

- To strengthen the section, the applicant could have provided evidence about where students will enter ALA Summerlin on day 1. It is a real concern -- with the size of the proposed school and growth plan, the applicant and leader must understand what student needs will be present and how the academic program will be able to meet those needs. This must be addressed to the satisfaction of staff as a condition of approval.
- The basic description of using a holistic approach, Core Knowledge, and Saxon was present, but the application did not explain clearly enough how these features would accomplish the SPCSA's growth goals, especially double digit gains. This must be addressed to the satisfaction of staff as a condition of approval.
- [Page 25](#) indicated 45 minutes blocks of remediation would be used for struggling students, but the application did not explain why this was going to be enough, and even more importantly, the daily schedules ([page 77](#)) show there was no reteach or remediation block for 6th, 7th, and 8th grade students. Gaps for some middle school students will likely be present and the application did not thoroughly explain how they would be addressed. This must be cured to the satisfaction of staff as a condition of approval.
- The discussion on [page 25](#) would have been more compelling with the inclusion of specific data or evidence that the model has been effective with various demographics. Both Core Knowledge and Saxon were presented as the crux of the academic program, but many other charters have experienced significant challenges with these two curricular programs in states where assessments are aligned with Common Core. These concerns could not be discussed fully with the CTF during the interview because it was clear the applicant did not possess sufficient knowledge of the rationale behind these choices and how they would address the achievement gap in Nevada. This must be addressed to the satisfaction of staff as a condition of approval.
- The applicant could have strengthened the programmatic approach for serving at-risk students such as English language learners. The discussion on [page 28](#) was problematic for ELL students, and raises questions about adequate staffing and effective instructional strategies. Merely providing content is insufficient to close gaps absent highly effective instruction tailored to the specific needs of the ELL population in nearby attendance areas and census tracts.
- The applicant did not include physical education or art in its curriculum description. This must be addressed to the satisfaction of staff as a condition of approval.
- While the application clearly stated content is aligned to the CCSS it did not provide sufficient evidence that the curriculum and instructional design would be aligned to Common Core, Nevada Academic Content Standards or the Next Generation Science Standards (e.g., Writing and Rhetoric). This was problematic given the challenges other states have had with the rigor of the applicant's proposed curriculum. Some content areas were missing key components (e.g., the five elements of reading are never mentioned). This must be addressed to the satisfaction of staff as a condition of approval.
- The applicant provided little detail regarding grouping practices, and those that were mentioned did not appear to be based on student need. The applicant did not adequately detail how grouping practices would be leveraged to address skill deficits, differentiated instruction, further independent learning, and/or support accelerated learning. It was unclear how instructional staff would ensure that Shared/Inquiry Socratic Seminar did not become guided group practice (which can happen when employing this method in the lower grades).

- Content differentiation was only vaguely discussed. The applicant did indicate that struggling learners would receive “targeted remediation” ([page 32-33](#)) during the integrated reteach and enrichment period each day, but fell short of “a tiered system of interventions.” For example, the applicant did not mention learning centers for independent and group learning so students “are able to build the knowledge base necessary to access rigorous instruction.” In addition, the applicant discussed a pull-out strategy to address those students without IEP’s who perform at the bottom 5% should Summerlin not receive Title I funds. In-class interventions would be determined by the grade-level during review of benchmark data (using the Galileo assessment—an instrument that the applicant failed to demonstrate was aligned to Nevada’s Academic Content Standards). However, the applicant did intend to include the state-mandated RtI approach as a strategy to support students with IEP’s, 504’s and struggling learners, and would utilize a student support team structure to do so. This must be addressed to the satisfaction of staff as a condition of approval.
- The CTF stressed leadership, but only focused on self-leadership development, and not that pertaining to the school community, or the community-at-large. More discussion should have been included about retention strategies and triggers, including timelines and interventions ([page 40](#)). This must be addressed to the satisfaction of staff as a condition of approval.
- The application needed to provide a clearer explanation about the proposed instructional strategies and how they would meet the needs of all students. Simply offering explicit instruction and shared inquiry plans and a list of publishers programs. This must be addressed to the satisfaction of staff as a condition of approval.
- The application indicated Core Knowledge and Saxon were properly aligned with the Common Core, and therefore SBAC, based only on assurances from the publishers themselves. It was unclear what due diligence, if any, the applicant performed to ensure this is true. Clear evidence is needed, and more clarity around how supplementary materials will be developed is essential. This must be addressed to the satisfaction of staff as a condition of approval.
- The measures of success for remediation based on year to year data on state exams are quite passive ([page 36](#)). [Page 38](#) indicated a special education director would be hired in year three, yet this information does not match the chart on [page 97](#) indicated a director would be hired in year 2. Given the size of this proposed school, the special education population in the local community, and the extensive reporting and monitoring requirements imposed by the Nevada Department of Education, it is unclear how the school will be able to operate a high quality and legally defensible special education program if this position is not phased in until later in the life of the school. This must be addressed to the satisfaction of staff as a condition of approval.
- Many questions remained after a thorough reading of the Driving for Results section and talking with the applicant and EMO during the capacity interview, particularly around assessments and alignment. It was not clear that the proposed Board and proposed Executive Director had a thorough understanding of how assessments needed to be leveraged, and what might necessitate a curriculum review. This must be addressed to the satisfaction of staff as a condition of approval.
- The applicant was not able to discuss or provide assurances that internal assessments and notably Galileo, were aligned to the curriculum, the standards and therefore the SBAC. It was evident the EMO’s standard plans were presented but without examination or analysis by the applicant. For example, the applicant should be deeply skeptical of choosing an assessment system (Galileo) that does not align with pacing of instruction ([page 49](#)), especially given the intent to examine

student progress for those in need of remediation against Galileo benchmark data to determine if expectations are being met. If the Galileo exams don't align to what is being taught, it is unlikely that teachers, parents, and students will respond positively to changes in the program or operation of the school that the Board may take in response to that data. If this assessment system is justified the CTF must explain how and why. Further, the schedule for 6-8th grade did not include a reteach/remediation block, so it is unclear how the plans on [page 51](#) are possible for middle school is a concern. These issues must be addressed to the satisfaction of staff as a condition of approval.

- The application would be stronger if the plans to support teachers in the development of embedded assessments were clear. More information about the creation of formative and summative assessments would be helpful and informative. At this time, the application does not sufficiently demonstrate valid and usable data will be available for internal monitoring and decision-making. This must be addressed to the satisfaction of staff as a condition of approval.
- It was not clear what would trigger corrective action by the school and/or disciplinary actions for teachers ([page 51](#)) and why this would be based only on state data. Baselines were set but it wasn't apparent how they were set. It appears that the EMO developed these goals, as the applicant, including the proposed school leader, didn't demonstrate knowledge about the program at this level of detail. Further information would be helpful to determine if the baselines chosen are realistic, and if the Board and proposed leadership have the capacity to implement any corrective actions. This must be addressed to the satisfaction of staff as a condition of approval.
- The At-Risk section did not sufficiently discuss content and instructional differentiation, targeted grouping practices, or staff pushing into the classroom. In other words, there was no discussion on providing the least restrictive environment for students with disabilities. In addition, the applicant made no mention of accelerating learning or nonacademic supports for at-risk students. Accordingly, no mention was made regarding ensuring students make sufficient progress, nor did the applicant discuss transition plans to move students to less restrictive learning environments as they accomplish their learning goals. This must be addressed to the satisfaction of staff as a condition of approval.
- The totality of the At-Risk section did not present a clear, realistic and committed plan to serving at-risk students, which likely represents the EMO's model more than the intentions of the CTF. The definition of "at-risk" was not clearly defined for this school; offering a broad definition of "anyone that is in danger of not succeeding" doesn't tell the reviewers anything-- what does that mean and how is it measured ([page 55](#)). Additionally, the definition of at risk did not align with that set forth in Nevada law and regulation. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The plans include a RTI block woven through the daily schedule ([page 56](#)) to address at-risk student needs. In the application, reteach and remediation, and RTI all seem to fall in the same 45 minute block of time, which was a problem as they are three very distinct activities. It is unclear how the RTI model is defined and executed. Furthermore, this block of time seemed to be missing for middle schoolers. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The application would be strengthened with a more specific plan for providing professional development to teachers and other staff to ensure they can support at-risk students. A PBIS system is mentioned, but the description lacked details of a cohesive plan ([pages 56 and 57](#)). There was no evidence of a demonstrated track record of success serving students with a wide



range of disabilities. These issues must be addressed to the satisfaction of staff as a condition of approval.

- The approach to ELL instruction raised many questions throughout the application process, as immersion without proper supports and expertise can often lead to the reality that students are set up to struggle. As already noted, the staffing plans also raised a red flag with only one licensed ELL teacher identified ([page 97](#)). While this model may be mandated by statute in Arizona, it is inconsistent with the requirements mandated of all public schools by the Nevada Department of Education. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The Child Find process ([page 59](#)) could be stronger with more description about what this process would include. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The application did not adequately answer how the school would handle any over identification of students as special education ([page 60](#)). The applicant indicated that complete programs would not be offered to support students with specific disabilities. This is a strong statement which may drive such families away from applying and is a violation of state and federal law, and the Authority's special education memorandum of understanding. The applicant needs to provide an explanation on what this actually means, and how all public charter schools are open to any student that applies. This must be addressed via a detailed, grassroots marketing plan that demonstrates how the school will meet the expectations of state and federal law and a revised enrollment policy which complies with all other areas of Nevada law and regulation and includes a weighted lottery that provides additional weights to students with disabilities satisfactory to staff as a condition of approval. The imposition of the weighted lottery policy is contingent upon the Legislative Commission approving R131-16P or a similar regulation identified by staff that relates to weighted lotteries prior to the commencement of the statutorily mandated marketing and enrollment windows.
- The application would benefit from a more detailed description of the PBIS system. For example, on [page 70](#) the application referenced a comprehensive approach, but then only offered a few examples. The school culture section conveyed a strong confidence that with strategic hiring and marketing, staff and students with values that align with the program would come, but that doesn't always happen. Even if the values are aligned from day one, it still takes work to set and maintain a culture in a school this large. It was clear the dress code would be upheld and small positive recognitions would be routine, but the overall structure of the program remains indistinct. These issues must be addressed to the satisfaction of staff as a condition of approval.
- For students needing remediation for social and emotional behavioral issues, it wasn't clear how the family will be engaged.
- The application did not identify clear goals and ways to monitor progress of these populations. This was especially true for how to measure the leadership model. It is unclear how the CTF knows this model is likely to support the program, and how will they track its implementation to ensure it works in the Summerlin school once open. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The Therapeutic Alliance scale mentioned was informative, but needs more explanation ([page 71](#)). More clarity could be added on the scaling system, and how it may be used for disciplinary referrals. These issues must be addressed to the satisfaction of staff as a condition of approval.
- Enculturation for students was only part of the fall plan, but not otherwise worked into the

application. The applicant needs to provide additional information about how students may be on boarded throughout the year based on Nevada's backfilling mandates. Like all Nevada charter schools, this school will be required to enroll students off its wait list immediately following the withdrawal of an existing student. This requirement, which is not present in Arizona, requires that schools that implement a culture-driven model have ongoing acculturation and onboarding processes targeted at new students and families throughout the year. These issues must be addressed to the satisfaction of staff as a condition of approval.

- The applicant did not provide descriptive detail in the narrative regarding the use of in- or out-of-school suspensions. No disciplinary actions were referenced in the narrative about attendance and truancy. It would have been helpful to provide examples of minor infractions (yellow). The discussion presented in the application was too general and not robust enough to convey with any certainty the appropriateness of the policies. These issues must be addressed to the satisfaction of staff as a condition of approval.
- There was no plan to ensure vulnerable student populations were not disproportionately impacted by discipline policies ([page 74](#)). These issues must be addressed to the satisfaction of staff as a condition of approval.
- The proposal provided assurance that school would be in session at least 180 days, but the section did not explicitly state the required number of minutes will be met. Hours per week are offered ([page 77](#)) but the application should make the information clearer. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The calendar and schedule planned may not be sufficient to support the academic program, particularly as it relates to middle school. As previously mentioned, the lack of RTI/reteach blocks for these grades was a serious concern. It was also still unclear if RTI/reteach was being used in the application interchangeably and why they are not treated as two distinctive goals. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The columns on the daily schedule chart on [page 77](#) did not add properly. Not only are the mistakes unacceptable for a professional document, in some cases they amounted to 450 minutes, which is longer than an 8-3 school day can accommodate. These issues must be addressed to the satisfaction of staff as a condition of approval.

### ***Specific Subset Ratings in the Academic Section (For Reference)***

- Mission and Vision
  - Approaches the Standard
- Transformational Change
  - Does Not Meet the Standard
- Curriculum & Instructional Design
  - Does Not Meet the Standard
- Distance Education Requirements
  - N/A
- Pre-K Requirements

- N/A
- High School Graduation Requirements
  - N/A
- Driving for Results
  - Approaches the Standard
- At Risk Students and Special Populations
  - Does Not Meet the Standard
- School Structure (Culture)
  - Approaches the Standard
- School Structure (Student Discipline)
  - Does Not Meet the Standard
- School Structure (Calendar and Schedule)
  - Does Not Meet the Standard
- A Day in the Life & Scenarios
  - Approaches the Standard



# Operations Plan

Approaches the Standard

## Summary

The proposed Board will accept stakeholder feedback through public comment time provided at the beginning of each Board Meeting and through the Executive Director of the school who will be responsible for meeting with stakeholders and reporting to the Board of Directors. The Board will receive regular updates from the Executive Director relating to the status of the school's academic, financial, and organizational health. Though the Board verifies the success of the school in relation to these aspects, Board members shall not interfere with the daily operations of the school or micromanage school personnel. The Board members only have power when in quorum and exercise that power through the development of policy as a body.

American Leadership Academy Summerlin will contract with the EMO, Charter One Education Group (COEG), to provide school leadership and back-office support. All non-administrative instructional personnel will be employees of the school, under the direction of EMO administrative staff. The Executive Director may also serve as the Director for year one to save costs. When an additional school is formed, each campus will have a Director and the Executive Director will act as the Regional Director for the ALA Summerlin (West Las Vegas) network.

Once again, this portion of the application lacks clarity, and in some cases even contains conflicting information. The organization chart that is included in this portion of the application does not seem to be consistent with the actual day-to-day running of the school. This is particularly concerning as this where a great deal of the operations of the school is to be done by an out-of-state EMO. This section again is vague, and presents confusing information regarding job titles and organizational structure. The lack of detail may not translate to poor student performance, but does raise questions about how thoroughly the applicant reviewed its submission with COEG and whether either the applicant or the EMO has spent sufficient time exploring the experience of other Nevada charter holders and EMOs or has cultivated relationships with key support organizations with appropriate context and expertise.

Furthermore, this section of the application clearly shows the proposed EMO's aggressive growth plans. The ALA Summerlin Board is proposing a rapid growth plan with minimal staff. This, unlike the lack of clarity contained in many sections of this application, is of great concern to the Authority. As noted previously, the applicant and the EMO must agree to meet certain performance objectives before this applicant or others can be permitted to replicate.

## Areas of Strength

- The CMO structure includes adequate staffing for the academic, fiscal management and operations for the proposed school. It also supports network growth.
- The application includes traditional school leadership job descriptions with job summaries, qualifications, and responsibilities. This appears to be intended to ensure that any identified school leader will meet the qualifications and competencies outlined therein.
- The applicant's EMO and school staffing plans are adequate (include academic, fiscal management and operations employees), and consistent with the mission, vision and

academic program.

- The school staffing structure includes instructional support for teachers (provided by the school leader), and a parent advisory council (presumably for student/family support). The operations staff seems quite robust, and should meet facilities and operational management needs. Basic plans for observation and feedback are clear, and there is a clear intention to provide mentoring for new teachers. The CTF is excited about teacher input and satisfaction.
- The applicant seeks to replicate a model that has opened several schools, and has a strong command of what's needed for a successful school opening. Key planning year milestones, leader development, and concrete actions were included in the plan, and they seemed reasonable and well-founded.
- The proposed insurance plan appears to be sufficient.

### ***Areas of Concern***

- The chart on [page 91](#) did not seem to reflect the actual leadership structure of the school. The lack of clarity within the organizational structure led to further questions about whether the applicants had fully considered the implications of having senior administrative staff hired by the EMO, even if there were plans to function as if the Board was solely responsible. An EMO has a lot of power and influence over the direction and management of a school, which requires that the authorizer make a determination as to whether it trust the operator and applicant with so many public dollars and students' futures. Additionally, it is important to note that other management contracts executed by schools replicating this school design have explicitly excluded school leadership from the list of staff eligible to be employed by the EMO. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The application included vague plans to hire and train one person (Academic Director) to handle a large number of major tasks ([page 93](#)). The SPCSA staff has concerns about the number of important functions that will be shouldered by a future, unidentified hire. The applicant must provide more detail about the timeline for hiring an instructional leader, the qualifications of the desired individual, and any training this individual will receive prior to the beginning of the charter. Lastly, it is essential for the SPCSA to learn how the Board will measure the success of the instructional leader and other leadership staff. These issues must be addressed to the satisfaction of staff as a condition of approval.
- Based on the interview, it was clear that Mr. Shirey, the proposed Executive Director, is a successful and proven leader, and he clearly has the trust of the future Board. However, he also has admitted a lack of knowledge of daily academic and broader educational expertise. He could be a very strong leader, but it does raise concerns about the allocation of duties and there is a performance deficit when it comes to experiences with high performing schools. These issues must be addressed to the satisfaction of staff as a condition of approval.
- There was confusion between titles and structures presented in various parts of the application. For example, the titles and job descriptions in the appendix do not match the titles and descriptions in the narrative. It seemed like details were still being figured out regarding structure and responsibilities, and the applicant needs to revamp the information presented within both the appendix and the narrative within the application. These issues must be addressed to the satisfaction of staff as a condition of approval.

- The applicant indicates that the regional ED may also serve as Summerlin's director in Year 1. This is problematic given the composition of the school's proposed board. It is not evident that the board as currently composed has the capacity to provide academic oversight, and hold the EMO accountable given the necessarily divided allegiances of a leader who serves both the vendor and the governing body of a public entity. It is unclear, consequently, whether sufficient compensatory controls have been developed by the applicant to address this inherent and unavoidable conflict. While the applicant includes information regarding third-party, EMO, and other training for the school leader, no details were included regarding the content of training. In addition, no specific information was provided regarding how, where, and when coaching/mentoring is implemented. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The EMO may have a track record with other schools in other states, but this application did not present robust plans that were sufficient to meet the criteria with respect to Nevada and Clark County. The application did not sufficiently explain how staff would be recruited and trained; the answers were too vague ([page 95-96](#)). These issues must be addressed to the satisfaction of staff as a condition of approval.
- More specific details on how many schools are in the pipeline and launching in other states should have been included. This information is imperative to determining if the proposed Board and EMO has the capacity to fulfill responsibilities outlined for recruiting. These issues must be addressed to the satisfaction of staff as a condition of approval.
- While the applicant indicated that the school leader would be responsible for recruitment, selection, and hiring staff, very little detail was provided regarding the timeline, sources for recruitment, etc. Other than the EMO placing ads on their website, it was unclear as to the other strategies the network would use to source school leadership. This is problematic, and the SPCSA needs to see a clear plan to successfully staff such a large school prior to opening. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The staff chart on [page 97](#) wasn't modified to match the school's proposed structure for example, the Assistant Director, the proposed instructional leader, position was not reflected, and that is a very key position. These issues must be addressed to the satisfaction of staff as a condition of approval.
- Class size would be classified as large and it wasn't clear why the number of teachers is held to a 30:1 ratio. Furthermore, there are many shared leadership positions (example .125 FTE for the special education director). The SPCSA would like for the applicant to provide a rationale for this approach, and quantify if this approach has been successful in other schools operated by COEG. This is especially important given that school support functions will be driven by out-of-state staff which lack Nevada-specific expertise necessary to be successful. Additionally, it is unclear that this approach complies with class size reduction requirements imposed by the Department of Education as a condition of receiving some funding streams. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The initial staffing plan did not include a full-time instructional leader. This was problematic given the board's capacity for academic oversight, and the regional ED's limitations for daily instructional practice. In addition, it was not possible to determine whether the student/teacher ratios are within compliance for Kindergarten for students with severe disabilities. These issues must be addressed to the satisfaction of staff as a condition of

approval.

- The parent advisory council was not mentioned in the narrative, and therefore, we do not have a description of this body's role with regard to the operations of the proposed school. These issues must be addressed to the satisfaction of staff as a condition of approval.
- There was no reference to a school social worker or case managers to provide student/family supports (e.g., emergency housing, counseling, etc.). These may be important positions considering the demographic makeup of Clark County, the size of the school, and state and federal requirements applicable to charter schools, including but not limited to services to homeless students and foster children and state laws and regulations related to the provision of a safe and respectful learning environment. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The salary range presented on [page 100](#) did not match the salaries in the budget worksheet. The budget actually pays less (35-38K) than the application narrative suggested (36K-44K). Given that the existing school replicating the ALA model needed to make salary adjustments to attract qualified and mission-aligned staff, additional information is necessary to determine if this is a reasonable budget, and if this amount will be sufficient to attract high-quality teachers. These issues must be addressed to the satisfaction of staff as a condition of approval.
- It is unclear who the qualified senior management team member will be to adequately audit the program and PD ([page 100-101](#)). If it is going to be the EMO or an EMO employee, it would raise some questions about the strategy and how the Board would access non-bias information for governance purposes. It is unclear what compensatory controls are in place to ensure that the governing body will be able to perform this essential oversight role. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The application noted the ED would be on campus during the growth year ([page 100](#)). However, the ED position goes from .5 to .25 FTE on the chart on [page 97](#). These issues must be addressed to the satisfaction of staff as a condition of approval.
- The hiring plan put a lot of work in year one on the .125 FTE position of HR employee. More detail is required to determine whether this staffing model will ensure success in meeting the recruiting targets necessary to ensure implementation of the academic program at a high level. These issues must be addressed to the satisfaction of staff as a condition of approval.
- It was unclear how the proposed Executive Director, Mr. Shirey, would be developed as the ED to help train staff ([page 103-104](#)). These issues must be addressed to the satisfaction of staff as a condition of approval.
- The applicant mentioned that there would be specific partnership plans with colleges and Universities. It is unclear what this entails and how it impacts the staffing model ([page 99](#)). Given the limited number of qualified educators graduating from Nevada institutes of higher education and the strong existing partnerships with the Clark County School District, it is unclear that there is sufficient interest, capacity, or support to make this a viable option absent clear evidence of support. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The application stated the EMO would audit the administrative team under the direction of

the ED ([page 104](#)) but the application did not describe the next steps if the audit revealed problems. The application would be strengthened with more information about how the school performance management system would work, particularly as it related to restructuring decisions or staff removal, as with a school and staff this size it is unlikely that the school will be able to entirely hire its way to a highly effective and mission-aligned teaching force. These performance management cycle issues must be addressed to the satisfaction of staff as a condition of approval.

- The scale strategy contained more detail regarding future growth, rather than explaining how the scale strategy would support the expansion to this campus ([page 106](#)). It would have been more productive from a review standpoint if staff was able to determine if there was an effort to clearly answer how the immediate plans would work for Summerlin. These issues must be addressed to the satisfaction of staff as a condition of approval.
- There was a note about EMO career centers ([page 107](#)). It is unclear what these are and how they will be deployed in Nevada. These issues must be addressed to the satisfaction of staff as a condition of approval.
- There was a discrepancy between the proposal and the services agreement regarding the EMO fee (\$900 vs \$810 per student).
  - It wasn't clear between which employees were hired by the EMO and which were hired by the school directly (pages 91-110). It was also stated that "under the direction of EMO administrative staff" but in the budget, there were no salaries for the ED, AD, Dean of Students, Office Manager, Receptionist and Nurse, all of which were identified as EMO hired staff. On page 110 it stated that "All key personnel for the school, including administrative personnel, will be the employees of the school and not the EMO." These issues must be addressed to the satisfaction of staff as a condition of approval.
- The chart on [page 110](#) also was inconsistent with the EMO services agreement. For example, the chart said the Board had responsibility to choose the curriculum, but it seemed clear in the agreement ([page 2 of 23](#)) that the EMO controlled the curriculum. Another example: the PD in the chart indicated the EMO "supports the school leader" and the leader "develops a professional development plan and implements it" but the services agreement placed the bulk of this responsibility on the EMO. These inconsistencies raise questions regarding the EMO how much authority rests solely with it and how little discretion the local Board and ED actually may have. Another example that was concerning: the EMO clearly wrote the bulk of the application (the Board wasn't aware of who actually wrote it when asked in the capacity interview) and then charged a fee in the budget of \$10,000 for the effort/the CTF wasn't aware of this cost either. These issues must be addressed to the satisfaction of staff as a condition of approval.
- From the application, it could be assumed no preferences or weighted lotteries would be used; the application should include explicit language to clarify this discrepancy. As discussed in a previous condition, these issues must be addressed to the satisfaction of staff as a condition of approval.
- The information on [page 112-13](#) was insufficient to describe adequate outreach to at-risk student populations. The applicant must include more details and a robust plan to engage all types of families and students. The note on [page 114](#) that staff would be removed from the



recruitment process was a concern. The application stated “The best way to avoid staff error is to remove them from the equation.” Aside from the more obvious concerns this raises about staff training, trust and personal outreach, it signals a strong reliance on the online portal and electronic marketing, which is inconsistent with best practice and would result in the unintended consequence of attracting an exclusive, advantaged student population and minimizing the number of non-English speaking families and/or low-income families applying or enrolling in the school. These issues must be addressed to the satisfaction of staff as a condition of approval consistent with previously articulated conditions.

- [Page 117](#) stated “Third, the school will employ a school leader with experience with both the proposed model and school start-up and growth.” Mr. Shirey is clearly accomplished and demonstrated enthusiasm and capacity to be a strong leader, however, he did not fit this description. This issue must be addressed to the satisfaction of staff as a condition of approval.
- No members of the CTF had charter school governance experience, which raised some questions about whether the Board would be able to recognize risks and/or indicators that the mission was not being met adequately. Given the lack of clarity regarding the reporting and employment relationships of key staff, the Board may be susceptible to being led by the EMO and/or leader without knowing what to ask and how to monitor the execution. This is surmountable, if the Board is extremely engaged and committed to learning and recruits members who balance a strong commitment to the mission and vision of the school with the degree of academic, organizational, and financial acumen and expertise specific to public schools and Nevada public entities and the professional skepticism necessary to provide independent and expert oversight of a complex, multi-million dollar public entity. The applicant team must identify and commit to PD from qualified, reputable sources with charter school expertise other than the EMO, especially on Governance ([page 87-88](#)). These issues must be addressed to the satisfaction of staff as a condition of approval.
- The heavy reliance on the EMO was especially worrisome given there was currently no track record of success in Nevada, the EMO is growing at an extremely aggressive pace in multiple states, and the schools are all planned to start large which is another high-risk factor that must be mitigated with clear limits on future growth that are predicated on academic, organizational, and financial performance.
- In the submitted bylaws: the size of the Board ([page 248](#)) was inconsistent with the proposal narrative ([page 84](#)); it is unclear if the board be made up of 5 to 7 members or 5 to 10. The By-Laws also indicated orientation and training was optional, which was a concern for the review team ([page 250](#)) and is inconsistent with state law. These issues must be addressed to the satisfaction of staff as a condition of approval.
- While the applicant provided a rubric for evaluating the effectiveness of services, the contract did not include corrective action should COEG not fulfill performance expectations. This issue must be addressed to the satisfaction of staff as a condition of approval.
- The applicant provides no mention of corrective action should student performance decrease over a period of time. More information would be helpful in evaluating the corrective action process for the school. This issue must be addressed to the satisfaction of staff as a condition of approval.
- Throughout the application and attachments there were inconsistencies regarding what the

EMO would provide, such as hiring leadership, and whether the school or EMO would be responsible for PD and curricular alignments and pacing etc. These issues must be addressed to the satisfaction of staff as a condition of approval.

- There were questions raised by the community that appear to be valid questions, about whether there will be an arm-length relationship between Schoolhouse and ALA/COEG. Mr. Glenn Way is a founder of ALA and is also a principal at Schoolhouse. The application indicated the Board would have discretion to use another developer, but the application also indicated the work was already progressing under Schoolhouse ([page 126](#)). This same concern was applicable to start-up funding, and it was not clear if the CTF did any due diligence to see if other sources of loans might be a better option. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The EMO had no obligations or responsibilities under the current agreement on real estate development, project management, financing or other real estate or construction needs ([page 13 of 23 in attachment 23](#)). These issues must be addressed to the satisfaction of staff as a condition of approval.
- The internal financial controls may be sufficient, but it wasn't clear how the Board would be monitoring performance, especially if the main sources of information were going to be the EMO itself and the administration which may be hired by the EMO. A clearer delineation of the roles of the vendor, school employees, and the governing body is essential to determine if these controls are sufficient to ensure that public officers and public employees retain oversight of public funds. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The contract terms clearly indicated the EMO would not keep the school operational (the agreement terminates) if charter funding is delayed. Due to known issues with the delay of charter school payments and reimbursements in Nevada, it is unlikely that any charter school in the state would be able to comply with that provision. Additionally, given the specter of lawsuits and advocacy challenges in other states, it would be wise to negotiate better terms to ensure children aren't harmed in such a situation ([page 15 of 23 in attachment 23](#)). At a minimum, the contract must be revised to include a provision that makes this term inapplicable in the event that any delay or interruption in funding that is attributable to failure to satisfy in whole or in part the record-keeping, reporting, audit, supporting documentation, or data access expectations of the Department of Education or any other state agency. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The potential seemed to exist, as per the current agreement, for many services to be charged back to the school. Things like PD, technology vendors and the SIS were mentioned for example. In some cases, such as PD, there was conflicting information as to who would provide it. Additionally, costs such as the SIS are currently covered by a legislative appropriation of the fee revenue. Nevada law explicitly forbids an EMO contract from containing a cost that is not directly attributable to the services of the EMO. Additionally, it also prohibits an EMO contract from requiring a charter school pay any costs associated with ensuring that services comply with state and federal law." As the state has mandated that all school districts and charter schools must utilize Infinite Campus as part of the state's statutorily-mandated automated system of accountability, it is unclear whether the EMO's contract complies with Nevada law in this key area. More broadly, it is unclear what services

are covered in the fee and what are not. A more precise schedule of fees and chargebacks must be disclosed for the governing body of the school to meet its legal and contractual obligations with regard to fiscal management.

- No transportation was planned, and the application did not have any discussion of why and how the school would minimize the impact on families [\(page 121\)](#). The applicant provided insufficient detail to explain how the school will meet its transportation obligations to students with disabilities, students on 504 plans, homeless students, and foster children. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The plan to provide students with a very basic, low-cost lunch alternative if they cannot pay is a major concern [\(page 121\)](#), [as it impermissibly identifies](#) the students who cannot pay (and offers unappetizing food for a dollar or less). Such an approach can be construed as an attempt to discourage high need students from attending. The application also states that “free or reduced lunches shall not be construed as an inherent right but as a privilege” [\(page 122\)](#). This is gravely concerning. NRS 388A.236(24) requires that applicants explain “the manner in which the charter school will ensure that the lack of such food service or participation does not prevent pupils from attending the charter school” if the school is not providing food service or participating in the National School Lunch Program. The implication that lunch may be withheld or downgraded is inconsistent with the fundamental requirements of the statute. These issues must be addressed to the satisfaction of staff as a condition of approval.
- [Page 122](#) indicated the EMO’s vendors would be used when possible to obtain best pricing, but did not clearly say multiple bids would be required and considered pursuant to the local government purchasing act, which applies to any entity that receives tax money in the state of Nevada. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The application needed to include user access control policies and procedures to remove access for departing employees, back-up, disaster recovery, and access to systems by Department of Education and Authority staff. These issues must be addressed to the satisfaction of staff as a condition of approval.
- The cash flow worksheet had total facilities at 25 percent of total revenue, which is significantly higher than the costs for many other charter schools. While this cost appears to have been identified in an attempt to budget conservatively, the applicant must provide substantial evidence that it has evaluated more cost-effective facilities and financing options and has put in place steps to procure a cost-effective facility, including but not limited to evaluating the financing options that have been pursued by other Nevada operators over the past four years. This issue must be addressed to the satisfaction of staff as a condition of approval.
- The application did not include an assurance on ADA compliance. This issue must be addressed to the satisfaction of staff as a condition of approval.

### ***Specific Subset Ratings in the Operations Section (For Reference)***

- Leadership Team
  - Does not Meet the Standard



- Leadership for Expansion (Experienced Operators Only)
  - Does not Meet the Standard
- Staffing
  - Approaches the Standard
- Human Resources
  - Does not Meet the Standard
- Scale Strategy (Experienced Operators Only)
  - Does not Meet the Standard
- Student Recruitment and Enrollment
  - Approaches the Standard
- Board Governance
  - Does not Meet the Standard
- Incubation Year Development
  - Approaches the Standard
- EMO Relationships and School Management Contracts (If Applicable)
  - Does not Meet the Standard
- Services
  - Approaches the Standard
- Facilities
  - Approaches the Standard
- Ongoing Operations
  - Approaches the Standard

# Financial Plan

Approaches the Standard

## Summary

The EMO will employ a Business Manager to manage school accounting and purchasing. Accounting will be accomplished using a reputable government accounting software platform such as Infinite Visions or Blackbaud. The Business Manager will be trained on the Nevada State chart of accounts for school finance and will follow GAAP and GASB standards. All purchase requests will be handled by the Business Manager to ensure school policy is followed and that optimal pricing is secured. The school Director may expend up to \$5000 without prior authorization insomuch as the expense is in alignment with school priorities and receipts submitted. The Business Manager shall account for all monies received and expended and make regular reports to the Executive Director.

Payroll will be handled by the EMO human resources team. The EMO currently processes payroll for over 500 employees and have established the procedures and processes necessary to ensure the accurate and timely completion of payroll. All payroll information shall be maintained in the hosted software to ensure visibility between ALA and the EMO. The Executive Director shall authorize payroll expenditures prior to releasing funds.

While the EMO proposed to be used by this applicant clearly has the capacity to manage the finances of a school of this size, and this section of the application contains a great deal of detail, the Authority remains concerned due to a number of misstatements and errors contained in this section of the application.

## Areas of Strength

- The budget is comprehensive and includes all components found in typical school models (e.g., personnel, instructional and operational expenses, etc.).

## Areas of Concern

- The [budget workbooks](#) said “Centennial Hills” on the school inputs page—this may be an error while loading the documents or could be because the group did not to change the name from a different application that was subsequently withdrawn by another applicant choosing to hire the same EMO. This issue must be addressed to the satisfaction of staff as a condition of approval.
- Some items did not align, for example, the salaries in budget versus in the narrative ([page 100](#)). This issue must be addressed to the satisfaction of staff as a condition of approval.
- More clarity was needed with regard to what the school would be receiving for the relatively high EMO fee. The budget narrative was very light on detail and should be much more robust both to provide appropriate context for reviewers and the public and to ensure that the application narrative contained sufficient detail to supplement the budget spreadsheet and ensure compliance with Section 508 of the Rehabilitation Act; this made budget analysis more difficult. This issue must be addressed to the satisfaction of staff as a condition of approval.

## ***Performance Record***

American Leadership Academy operates 7 charter schools in Arizona. The original ALA, located in Gilbert AZ, began operation in the year 2000. ALA began expanding its AZ network beginning in 2011 with ALA – Queen Creek. 2012 saw ALA open San Tan Valley. ALA Queen Creek Elementary and ALA Mesa opened in 2013. ALA Anthem South began operation in 2015 and ALA Ironwood began its operation in 2016. The Achievement Data provided by the applicant only represented academic years 2013-14 and later. No data from the past three years was included in the attachment as requested by this application process. The ALA-AZ schools' data that was presented was a mixed bag with regard to accountability results from ratings of High Performing (2009-2010) to "C" (average) during the 2011-12 accountability year. Furthermore, while the Authority does not discard other state's performance data, the Authority is leery of relying on such data.

ALA also has one currently approved charter school in Nevada. This school, ALA-North Las Vegas, opened in the fall of 2017. Due to the recent opening of this charter school, little reliable performance data is available.