

Charter School Application Report

Nevada Strong Academy

Recommendation for the Resubmitted Summer 2019 Charter Application Cycle

General Information

Proposed Name	Nevada Strong Academy
Proposed Mission	To prepare every student to be college and career ready to lead in their curiosity and providing students with an exceptional, well-rounded education through high-quality instruction rigorous curriculum, and character development.
Proposed EMO	Royal School System
Proposed Grade Configuration	Opening: Kindergarten – 5 th grade Full-Scale: Kindergarten – 12 th grade ¹
Proposed Opening	August 2020
Proposed Location	89119, 89169, 89106, 89107 and 89108 zip codes

Process/Key Dates for Nevada Strong Academy

- New Charter Application Training
- March 15, 2019 – Notice of Intent is received
- July 15, 2019 – Application is received
- August 15, 2019 – AB 462 Addendum is received
- October 14, 2019 - Capacity Interview is conducted
- December 17, 2019 – Application is denied by the Authority
- December 30, 2019 – SPCSA staff met and conferred with the Nevada Strong Academy Committee to Form on the method to correct the identified deficiencies
- January 21, 2020 – Resubmitted application is received by the Authority²
- February 19, 2020 – SPCSA staff discussed resubmission with applicant team

¹ The school plans to ultimately serve students in grades K – 12, but would not serve students above 10th grade in the first charter term.

² The Nevada Strong Academy Committee to Form requested two additional meetings prior to January 21, 2020 to further discuss the deficiencies within the initial charter application.

Planned Enrollment Chart

	<u>2020-21</u>	<u>2021-22</u>	<u>2022-23</u>	<u>2023-24</u>	<u>2024-25</u>	<u>2025-26</u>
<u>K</u>	112	112	112	112	112	112
<u>1</u>	84	112	112	112	112	112
<u>2</u>	56	84	112	112	112	112
<u>3</u>	56	56	84	112	112	112
<u>4</u>	56	56	56	84	112	112
<u>5</u>	56	56	56	56	84	112
<u>6</u>	0	112	112	112	112	112
<u>7</u>	0	0	112	112	112	112
<u>8</u>	0	0	0	112	112	112
<u>9</u>	0	0	0	0	140	140
<u>10</u>	0	0	0	0	0	112
<u>11</u>						
<u>12</u>						
<u>Total</u>	420	588	756	924	1120	1260 ³

Executive Summary, Process and Recommendation

During the December 17, 2019 Authority meeting, SPCSA staff presented the findings of the initial review committee and SPCSA staff for the Nevada Strong Academy charter application. The initial application was found to exhibit shortcomings within all four of the components of the submitted application. The review committee and SPCSA staff found that the proposed academic, organizational and financial plans did not meet the standards as outlined in the charter application rubric. The review committee and SPCSA staff also found that the application also did not Meet the Standard within the Meeting the Need component of the application.

A second committee comprised of SPCSA staff reviewed the resubmitted Nevada Strong Academy application after it was received on January 21, 2020. The review committee approached rating the resubmission with two primary concentrations:

- To determine if the applicant had corrected the original deficiencies found in the original application; and
- To verify that the applicant's resubmission did not change the rating of any component of the rubric that was determined to previously Meet Standard

³ Nevada Strong Academy does propose to grow to grades K-12. However, because it would not serve 12th graders until a second term, the review committee did not rate this section.

Upon resubmission, the review committee determined that a few deficiencies within the original application had been addressed, and the ratings against the charter application rubric reflected these changes. Some improvements were found within the academic, operations and financial sections of the application. The resubmission provided more detail with regards to the proposed curriculum for the school, and included sufficient evidence to confirm that the proposed curriculum aligned with the Nevada Academic Content Standards (NVACS). The resubmission also provided evidence that the Committee to Form has conducted additional outreach. Noticeable progress was also manifested within the facilities subsection. The Committee to Form provided additional, supporting information regarding the viability of the proposed facility, and confirmation that it could house the proposed school.

Despite these modifications within the resubmission, the review committee finds that the charter application has not 'Met the Standard' in a sufficient number of application components to be recommended for approval. The review committee finds that a significant number of deficiencies exist within the resubmitted application. The resubmission fails to provide sufficient evidence of outreach within the community the school intends to serve, specifically the 89119, 89169, 89106, 89107 and 89108 zip codes. It is also not clear that the proposed model meets the need of the community, or that the immediate community has been actively involved in the development of the application.

Additionally, the review committee concluded that significant deficiencies remain in the organizational and financial sections. There is little clarity surrounding the proposed role of the EMO in both the management and day-to-day operations of the school, particularly as it relates to the implementation of the academic program. The distribution of responsibilities is inconsistent throughout the narrative and conflicts with the proposed master service agreement. The proposed budget also contains a number of inconsistencies with regard to the proposed EMO fee and staffing plan, and relies on unsubstantiated fundraising levels.

For these major reasons, in addition to those outlined within this memo, SPCSA staff recommends that the Authority deny the Nevada Strong Academy charter school application, resubmitted to the SPCSA on January 21, 2020. The proposed school does not meet or exceed the minimum financial or administrative operating standards, procedures and requirements. Sound evidence is not provided which demonstrates the effectiveness of the educational program proposed for the school.

Proposed motion: Deny the Nevada Strong Academy charter school application as resubmitted during the 2019 Summer Application Cycle based on a finding that the applicant has failed to satisfy the requirements contained in NRS 388A.249(3).

Summary of Application Section Ratings

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

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

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

The rubric is broken into four major sections as outlined below and detailed descriptions of each rubric item can be found in the full rubric. A copy of the rubric used for this cycle can be found here: <http://charterschools.nv.gov/uploadedFiles/CharterSchoolsnvgov/content/News/2019/191217-Updated-Application-Rubric.pdf>

<u>Application Section</u>	<u>Initial Rating</u>	<u>Resubmission Rating</u>
Meeting the Need	Approaches the Standard	Approaches the Standard
Targeted Plan	Does Not Meet the Standard	Does Not Meet the Standard
Parent and Community Involvement	Approaches the Standard	Approaches the Standard
Academic Plan	Approaches the Standard	Approaches the Standard
Mission and Vision	Approaches the Standard	Meets the Standard
Transformational Change	Does Not Meet the Standard	Does Not Meet the Standard
Curriculum & Instructional Design	Does Not Meet the Standard	Approaches the Standard
Distance Education Requirements	N/A	N/A
Pre-K Requirements	N/A	N/A
High School Graduation Requirements ⁴	N/A	N/A
Driving for Results	Approaches the Standard	Approaches the Standard
At-Risk Students and Special Populations	Approaches the Standard	Approaches the Standard
School Structure (Culture)	Approaches the Standard	Approaches the Standard
School Structure (Student Discipline)	Approaches the Standard	Approaches the Standard
School Structure (Calendar and Schedule)	Approaches the Standard	Approaches the Standard
A Day in the Life & Scenarios	Approaches the Standard	Approaches the Standard
Operations Plan	Does Not Meet the Standard	Approaches the Standard
Leadership Team	Approaches the Standard	Approaches the Standard
Leadership for Expansion	N/A	N/A
Staffing	Does Not Meet the Standard	Approaches the Standard
Human Resources	Approaches the Standard	Approaches the Standard
Scale Strategy	N/A	N/A
Student Recruitment and Enrollment	Does Not Meet the Standard	Approaches the Standard
Board Governance	Meets the Standard	Meets the Standard
Incubation Year Development	Does Not Meet the Standard	Does Not Meet the Standard
School Management Contracts	Does Not Meet the Standard	Does Not Meet the Standard
Services	Approaches the Standard	Approaches the Standard
Facilities	Approaches the Standard	Meets the Standard
Ongoing Operations	Approaches the Standard	Approaches the Standard
Financial Plan	Does Not Meet the Standard	Does Not Meet the Standard

⁴ Nevada Strong Academy does propose to grow to grades K-12. However, because it would not serve 12th graders until a second term, the review committee did not rate this section.

Meeting the Need Section

As previously stated, the review team determined that the initial application had 'Approached the Standard'. Upon resubmission, it was apparent that the Nevada Strong Academy Committee to Form took a number of steps to improve this rating against the rubric.

The resubmission maintains the same identified zip codes in which to locate the school that have a number of 1 and 2-star schools, attempting to meet the geographic need as outlined in the SPCSA Needs Assessment. Additionally, the proposed founders and proposed Board did demonstrate a passion and desire to create a high-quality option for all students. It is clear that the Committee to Form used the resubmission window to attempt to garner support for the school.

However, despite the number of letters of support, the applicant remains unable to demonstrate that it has generated significant community engagement with the families it proposes to serve, or that the families in the community in which the school proposes to locate were involved in the development of the plan. Within the resubmission, the applicant provided a limited number of support letters/intent to enroll forms from families in the targeted zip codes. The Committee to Form has made efforts since the initial application to conduct community outreach, and articulates plans to continue community outreach post-approval, but it remains unclear that this will result in access to a high-quality school for students currently attending 1 or 2-star schools. There is limited evidence that the proposed model has been tailored to one of the identified communities, or a clear explanation of how the proposed model meets the needs of the community. Few letters of support originate from one of the identified zip codes, and only a limited number of the letters provide the proposed accountabilities of both parties and the time-specific deliverables that are responsive to community needs.

Areas of Strength

- The Committee to Form articulates that they seek to meet the geographic need identified in the SPCSA's Needs Assessment by locating in zip codes with many 1 and 2-star schools. Additionally, the applicant team reaffirms their commitment to serving underperforming, at-risk populations. Need does exist in these proposed areas.
- The proposed Board and school leaders understand the importance of increasing the number of high-quality options in the proposed areas where they intend to locate. The Committee to Form is motivated by doing good work for high-need students.
- The school proposes to serve a high number of Free and Reduced Lunch (FRL) students. This commitment addresses one underperforming subgroup within the demographic need section as outlined in the SPCSA Demographic and Needs Assessment.

Areas of Concern

- The Committee to Form confirmed that there are identified zip codes that the school wishes to serve, but limited student recruitment has occurred to date. Specifically, the current outreach to date indicates that the majority of intent to enroll and interest forms originate from outside of the targeted zip codes. This is concerning as it cannot be established that the proposed school is providing high-quality seats to those students currently attending 1 or 2-star schools.

- Based on the information provided in the resubmission, it is not clear that there is demand for the proposed school model in the targeted community, or that the immediate community participated in the development of the proposed academic program.
- The applicant team has stated that they have engaged with the community by attending various activities and going to churches to raise awareness about the proposed school. The Committee to Form noted an awareness of the needs of the community as active volunteers at a local preschool in one of the proposed zip codes. The Committee to Form also has an active member of an advisory board as well as other organizations in the area. However, few examples of how the community informed or assisted in the development of the application were provided. It is not clear that the community has been an active participant in the application process, or that community input has molded the application or proposed school model.

Academic Section

As previously stated, the review team determined that the initial application had 'Approached the Standard'. Previous strengths identified were determined to have remained in place upon resubmission.

Some additional strengths were noted within the resubmitted application which resulted in the review committee improving the ratings for a few subsections within this component. Specifically, the Committee to Form provided a set of curricula for all major subject and content areas. Selected curricula, in most cases, was verified to align to Nevada Core Academic Standards within the application. The applicant has also added a staff position that is solely dedicated to serving the EL student population, which represents a significant portion of the anticipated student body. Additionally, the resubmitted application provided additional information regarding the proposed professional development to be delivered to teachers.

There are a number of weaknesses within the academic section that raise serious questions about the applicant's readiness to open, however, which ultimately led to this section being rated as 'Approaches the Standard'. Specifically, it is not clear that the performance goals for the school are rigorous, can steer the school to at least a 3-star rating in the first years of the school, or are aligned to the Nevada assessment battery or the additional proposed assessments the school plans to implement. Additionally, while the school has added staff to support all students, including EL and SPED students, the application does not include a detailed plan for how performance for these students will be tracked and analyzed. Lastly, it is not clear which party in the charter proposal owns the academic plan and model. While the narrative describes the school leader as the ultimate owner of the academic model, significant responsibilities and support from the EMO are outlined in the proposed service agreement, and the EMO was best able to answer implementation questions during both meetings with the applicant. This raises concerns about accountability structures and the Committee to Form's readiness to open.

Areas of Strength

- The Board is comprised of multiple individuals that have experience within education, and understand the importance of data, community and family engagement. Additionally, the applicant noted during the capacity interview that an academics committee is already established.
- The applicant spoke to the importance of home visits during the incubation year, a process that would help the proposed school begin to build relationships with students, families and parents as well as increase stakeholder investment in the school community. The applicant detailed that home visits are the preferred method to reach parents and students prior to the proposed opening, but other face-to-face meetings at the school site were an option to promote student success.

Areas of Concern

- The application includes a number of fundamental features, strategies and components of the program that support the proposed curriculum. The applicant was unable to clearly articulate how all of these design elements would work together in order best serve all students, particularly those from an underperforming student group.

- While the proposed performance goals tie directly to the mission of the school, benchmarks under assessments do not appear aligned to a Nevada context within the application, and goals prior to year 3 are underdeveloped. It is not clear that the school's internal goals clearly align to the NSPF and Authority performance framework. Initial academic goals are not sufficiently rigorous.
- Within the incubation year and operational execution plan, it is noted that curriculum will be developed and finalized in terms of scope and sequence, but it raises questions about the applicant's readiness to open given that this critical piece of the academic model is incomplete and not included in the incubation year plan. Other portions of the application also underdeveloped and/or may not be aligned to the proposed model, including the proposed plan to track EL student performance.
- The initial application notes that Royal School System does not have a data system, and a system to track performance is referenced, but not included in the application. In the resubmission, the applicant states that a plan will be developed to track all student data, but no details are provided. This is concerning given that the application consistently discusses the importance of data in decision-making, both at the management and governance levels.
- It is not clear who ultimately will lead the implementation of the proposed academic model. The narrative makes clear that the proposed school leader is responsible for the academic success and community outreach and will provide associated reports. However, the Master Service Agreement (MSA) included within the resubmission states that the proposed EMO will provide educational services which include curriculum development, instruction and oversight of subgroup services, among other responsibilities. When taken together, there is not a clear articulation of clear and specific strategies and activities that explicitly identify the responsible parties. This raises concern about the applicant's readiness to open and the ability of the Committee to Form to be responsible for significant student achievement gains.

Operations Section

As previously stated, the review team determined that the initial application 'Did Not Meet the Standard'. Previous strengths identified were determined to have remained in place upon resubmission.

Within the resubmission, a few additional improvements were noted by the review team. An ELL position was added to the staffing plan so as to be more responsive to the anticipated student body population which will include a sizeable number of EL students. The facility subsection within the component was rated as 'Meets the Standard' as additional details were provided that confirm the proposed facility is a suitable location for the school.

While the members of the proposed Board bring a wealth of diverse experiences and backgrounds to the school, and efforts have been taken to establish key structures such as committees, there are many shortcomings within the operations section. A number of concerns center on role and accountability structures for the proposed EMO, school leadership and school staff. There are also questions about current student recruitment efforts to date as well as the proposed staffing structure and its alignment to the budget. While a number of intent to enroll forms/letters of support were provided within the resubmission, a small number of those submitted originate from the zip codes that the school intends to serve. These shortcomings prevent the review committee from rating this section higher than 'Approaches the Standard', and represent significant concerns about the applicant's preparedness to open.

Areas of Strength

- The Board clearly stated the data or performance measures that would be most critical in their governance role. Specifically, the proposed Board noted that it would be monitoring formative assessments such as MAP shortly after it is administered as well as financial data on a monthly basis when the board convenes.
- The Board understands its governing role and that it is not charged with day-to-day management of the school. Additionally, the applicant noted during the capacity interview that there is already a governance committee established.
- Information provided for the facility indicates that it is a viable option within the community and zip codes in which the school proposes to locate.

Areas of Concern

- The Board articulated that a primary reason for choosing the Royal School Services was their ability to develop the principal's capacity, and the time and attention they can devote to leadership development. The review committee has reservations about the on-site support the EMO can provide the proposed leader given that they are currently not located in Nevada, and the resubmission notes that these details have yet to be finalized. Moreover, this rationale raises additional questions as Royal School Services does not have any current schools to support.
- There was a lack of clarity and completeness with regard to the proposed role of the EMO, and there is not clarity around the proposed management roles and distribution of responsibilities. The submitted narrative and revised master-service agreement within the

resubmitted application still contain a number of inconsistencies, and the roles and responsibilities of the EMO and Principal remain ambiguous. While the resubmission does clarify that the Board is ultimately responsible for holding both parties accountable, and that the Principal is responsible for the success of the academic program, how this is accomplished is very unclear. The narrative states that the proposed school leader is responsible for the academic success and community outreach. However, the Master Service Agreement (MSA) included within the resubmission states that the proposed EMO will provide educational services which include curriculum development, instruction and oversight of subgroup services, among other responsibilities.

- Additional concerns arise regarding the proposed coaching, professional development and support of teachers and the proposed school leader. It is not clear who provides professional development to teachers as the narrative conflicts in multiple places. The Principal is also charged with managing the academic program, yet the EMO will be coaching the leadership team and making recommendations regarding the success of the program. This proposed structure does not demonstrate effective assignment of management roles and responsibilities.
- The Committee to Form understands that strong enrollment drives revenue, and can prevent some financial concerns. A significant majority of the Intent to Enroll letters provided, however, originate from areas of Las Vegas that fall outside of the Needs Assessment and the intended zip codes that the school intends to serve. Evidence of outreach does not demonstrate an understanding of the community likely to be served, and does not exhibit sufficient numbers of students who are representative of the surrounding zoned schools.
- The application provides a plan for the incubation year with key personnel that are responsible for various workstreams, but it is not clear this plan has been adjusted to reflect the resubmission process. Additionally, there is an operational execution plan provided within the application, but no owners are listed. It is unclear how these two documents are reconciled. Both raise questions about the Committee to Form's preparedness to open.

Financial Section

As previously stated, the review team determined that the initial application 'Did Not Meet the Standard'. Previous strengths identified were determined to have remained in place upon resubmission.

The applicant demonstrated that, through the experience of the proposed Board, there is significant financial acumen and budget management experience. Overall, however, there are significant deficiencies exist within this component of the application. The Committee to Form is expecting substantial fundraising amounts, which are included in the budget, but represent amounts that are unsubstantiated and not consistent with those outlined in the narrative. While the proposed school leader and EMO representative state a willingness to provide contingency funds should fundraising goals fall short, no Letters of Commitment are provided. The Committee to Form acknowledged the proposed fee for the EMO was reduced, but was unable to provide clarity about how this fee structure was established and the rationale for it to be a basis of all gross revenues. Finally, there are discrepancies between the budget and proposed staffing plan as the number of staff members is inconsistent throughout the proposed initial charter term.

Areas of Strength

- Multiple members of the applicant team have experience in managing a budget, including school-based budgets. Additionally, the applicant noted during the capacity interview that there is already a finance committee established.
- The applicant team has experience in fundraising and writing grants, which could translate to additional funding for the school if approved.
- The Committee to Form provided possible contingency plans if fundraising or enrollment figures are not met. The proposed Board indicated that some positions would need to be cut, or that full-time positions would need to be reduced to part-time.

Areas of Concern

- The resubmitted application does not provide any Letters of Commitment to substantiate the fundraising figures included within the budget. While the applicant team did note that they plan to personally invest in the school, and there is a possibility of bringing in national funders, no specifics were provided. This is concerning, especially since the applicant includes significant fundraising amounts throughout the charter term. This could lead to very large deficits if fundraising goals are not achieved, and does not represent balanced, realistic, evidence-based revenue and expenditure assumptions. Fundraising amounts are also inconsistent between the narrative and proposed budget. These present evidence that the school could become insolvent.
- The proposed fee structure is inconsistent between the narrative and the budget. No detail is provided as to how the fees were structured, or why it is reasonable for it to be based on all gross revenues.
- The staffing plan within the narrative and the budget do not align across multiple years of the proposed term. This represents a significant concern, that could negatively impact the delivery of the proposed model.
- It is not clear that the school will have significant cash reserves in both the incubation

year and early in the proposed term. This represents significant risk to the school, and raises viability concerns.

Capacity Interview Summary

Based on the independent and collective review of the application, the review committee conducted a 90-minute in-person interview of the applicant to elicit any necessary clarifications or additional information about the proposed charter school and determine the ability of the applicants to establish a high-quality charter school. The capacity interview for Nevada Strong Academy was conducted on Monday October 14. All but one of the proposed members of the Committee to Form attended on behalf of the applicant. Additionally, two representatives of the proposed EMO for the school – The Royal School System – attended the capacity interview. Questions during the capacity interview were developed by the team of reviewers to specifically address the details of the Nevada Strong application and focused primarily on four key areas:

- The ability of the applicant to meet one or more of the academic or demographic needs as outlined in the SPCSA Academic and Demographic Needs Assessment.
- The academic plan, including the projected enrollment, the proposed EMO and their role in the proposed school, curriculum, remediation, student support services, assessments and the data.
- The operations plan, including student recruitment, organizational chart, role and responsibilities of the EMO, Board governance, capacity and related documents.
- The financial plan, including the proposed budget, prospective facilities, proposed EMO fees, procurement processes, role of the Board in financial management and alignment to the proposed academic model.

Information gleaned from the capacity interview were coupled with the initial review of the application to determine final ratings on the rubric. Relevant information from the capacity interview is incorporated in the findings outlined above.

Meet and Confer

Members of the Nevada Strong Academy charter school Committee to Form met with SPCSA staff to discuss the deficiencies on multiple occasions prior to the January 21, 2020 resubmission. The applicant team asked a number of questions and sought clarity about the identified deficiencies.

District Input

Per Assembly Bill 462 (2019), the SPCSA solicited input from the Clark County School District regarding this application⁵. The timeline regarding this request for input is below and the response provided by the Clark County School District is attached.

- September 16, 2019 – Memo sent to CCSD soliciting input.
- November 6, 2019 – Presentation by CCSD staff to CCSD Board of Trustees regarding input.
- November 13, 2019 – Written input provided from CCSD to SPCSA.
- January 14, 2020 – Written notification from the SPCSA to CCSD regarding the potential for resubmission of this application.
- January 23, 2020 – Written notification from the SPCSA to CCSD regarding timeline for possible action on the Nevada Strong Academy resubmitted application.

⁵ Assembly Bill 462 (2019) section 6.3, subsection 1, paragraph (d): “The proposed sponsor of a charter school shall, in reviewing an application to form a charter school...If the proposed sponsor is not the board of trustees of a school district, solicit input from the board of trustees of the school district in which the proposed charter school will be located.”