

2017 CHARTER SCHOOL EXPANSION AMENDMENT REQUEST

Legacy Traditional Schools-Nevada, Inc. Request to Operate an Additional Campus

Legacy Traditional School-Southwest



Submitted by: Legacy Traditional Schools- Nevada Governing Board

October 6, 2017

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Executive Summary

An overview of the mission and vision for the expanded school network

The vision of Legacy Traditional Schools is to “Positively impact the education of every student”. Our vision has not changed from our founding school proposal nor have we deviated from our vision’s quest. After hosting many community events and providing parent information presentations, we became strongly motivated based on the feedback and interest received. To execute this vision with fidelity based on the need we see in the state. With over 2,000 parents on an interest list in 2015, we answered the call by submitting a charter application and in October 2015, the Board of the State Public Charter School Authority agreed that parents indeed deserve Legacy Traditional, a high-quality educational choice. Legacy’s application was approved, and we are authorized by the State of Nevada to begin educating children in the fall of 2017. Substantiating the need for high-quality education becoming available to Nevadans, the 2016 Quality Counts report was released in January 2016 ranked Nevada last. For the first time, the Silver State fell behind all other states and Washington, D.C., in the annual Quality Counts report, which assigns overall scores to states based on student performance, school financing and other qualities of K-12 public schools (Education Week, 2016)¹. “It’s honestly disheartening,” said Nevada interim Superintendent Steve Canavero (Milliard, 2016)². The execution of an innovative, public educational plan outlined in the following proposal will produce results including a Five Star distinction for each school in our network. Legacy’s academic results will organically influence conversation and collaboration with local traditional district schools. Contrary to the largely symbolic reactions to competition evident when the school choice movement was just beginning, we find evidence of significant changes in district policy and practice. The most common positive response, found in 8 of the 12 locations, is district cooperation or collaboration with charter schools. Where school districts once responded with indifference, symbolic gestures, or open hostility, we are starting to see a broadening of responses, perhaps fueled by acceptance that the charter sector will continue to thrive, or by knowledge that many charters are providing examples of ways to raise academic achievement (Holley, Egalite, and Lueken, 2013)³. It is our vision to move the trajectory of educational outcomes for all students in all school throughout the community through collegial partnerships with all traditional public schools leaders in the community through. The vision, as intended, is based on the principle that high quality educational systems have a solemn duty to make a positive impact on those they directly serve as well as positively impact educational opportunities of those they do not directly serve through consumer demand. The driving force of this vision is the school’s mission.

Legacy Traditional Schools’ revised mission for the expanded school is to provide all students with opportunity, leadership, guidance, and support to achieve academic excellence in a safe, neotraditional learning environment, with instruction from caring, knowledgeable and highly effective educators and in cooperation with supportive, involved families. The founding school’s mission was “Legacy Traditional School will provide motivated students with an opportunity to achieve academic excellence in an accelerated, back to basics, safe learning environment taught by caring, knowledgeable and highly effective educators in cooperation with supportive, involved families.

We believe that our new expansion school’s mission is built on the foundation school’s mission. We are amending based on a collection of feedback and artifacts in the community as well as the guidance of SPCSA staff and Board members.

¹ “Quality Counts Marks 20 Years,” *Education Week*, 7, January 2016, http://www.edweek.org/media/qualitycounts2016_release.pdf

² Milliard, Trevon. “Nevada falls to last on education ranking.” *Reno Gazette-Journal*, 11, January 2016. <http://www.rgj.com/story/news/education/2016/01/07/nevada-falls-last-education-ranking-despite-improvement/78397820/>

³ Marc J. Holley, Anna J. Egalite, and Martin F. Lueken. "Competition with Charters Motivates Districts." *Education Next*, FALL 2013 /VOL. 13, NO. 4.

Proposed model and target communities

The same architectural themes will be used across all of Legacy's campuses, to establish a brand and identity which set our schools apart from current physical structures and area schools of choice. A parent whose children attend a Legacy school in one community can expect to see recognizable and familiar architecture should they visit or transfer to a Legacy campus in another community. Today's Legacy campuses are approximately 81,000 square feet in size and occupy 7-9 acres of land per campus. We will build a state-of-the-art Kindergarten through eighth grade campus conducive to learning, development and extracurricular activities. The site will be designed to accommodate the prescribed requirement for parking stalls including handicap stalls. Pick-up and drop-off queuing will utilize the drive aisles through the parking lot as well as other perimeter areas to maximize the queuing capacity of the campus. The site will include an athletic field area with a regulation baseball/softball field, a field to accommodate football and soccer, as well as general areas for play and physical education classes. The site plan includes playground equipment areas with swing sets, and an outdoor basketball court that includes 4 side basketball goals. The building is designed around a core masonry construction area which houses administration offices including the health center, an approximately 6,000 square foot gymnasium, stage, cafeteria and commercial type kitchen. There are two wings of classrooms spanning from each side of the center masonry core which house a total of approximately 47 classrooms. Each classroom is designed to accommodate 30 students and includes finished cabinetry, which includes student storage cubbies, hand washing sink and a drinking fountain. Classrooms are also equipped with computers, a ceiling mounted projector, whiteboards, and tack boards to facilitate visual and kinesthetic the learning processes. All classrooms have carpeted tile flooring to attenuate noise levels. The Science Lab and Art Room have a polished concrete floor finish to better fit intended and hygienic use. Classroom areas are arranged by grade level. Kindergarten classrooms are equipped with a restroom. In addition to the typical classrooms as described above, the building also includes: resource rooms, a computer lab, library, parent volunteer/PTO storage rooms, conference rooms and more. Music classrooms include a separate Mozart Music Lab with keyboards and computers. Legacy Traditional School will hire approximately 70 certified and classified staff to implement instruction and all related school operations. The zip code for the proposed campus is 89113.

The outcomes you expect to achieve across the network of campuses

The long term academic goal of Legacy Traditional School is to create and maintain a school culture where students are healthy, safe, engaged, supported and challenged. All students in all subgroups will accomplish measurable growth greater than their projected growth model trajectory and will meet or exceed performance standards in all content areas measured by State annual assessments. Additionally, all third grade students will demonstrate proficiency on the ELA assessment and students enrolled in 5th and 8th grades will demonstrate mastery on the science CRT assessment by following our established program of instruction. Our ELL population will become fluent English speaking, homeless and migrant students will have all available resources and our Exceptional Students will have the goals outlined in their gifted or disabled individualized educational plans met. Legacy Traditional School – Southwest will be a five-star rated school. The organization goal is to continue to build AdvancED accredited schools throughout the state of Nevada in communities of need and the community demand for high quality public education. Legacy will confirm routine year round submissions to NSPCA to ratify our organizational goals and meet the Organizational Performance Indicator outlined in the NSPCSA Charter School Performance Framework4. Legacy's financial goals are to exceed the measures outlined in the Performance Framework (e.g. Maintain a ratio of 1.1 or greater current assets to liabilities, Greater than 60 cash, exceed 95%

Enrollment Forecast Accuracy not be in default of loan covenant(s) and is not delinquent with debt service payments, Aggregated Three-Year Total Margin is positive and the most recent year Total Margin is positive, Debt to Asset Ratio is less than 0.90, Three-Year Cash Flow = ((Prior Year 3 Total Cash)) - ((Year 0 Total Cash)), and Debt Service Coverage Ratio is equal to or exceeds 1.10).

The key components of your educational model for the expanded school

Unlike any K-8 school in the area, Legacy Traditional School features three unique models:

- The blend of direct teacher instruction with computer-based learning, integrated with Depth and Complexity differentiated instruction strategies
- The Mozart Performing Arts Program
- The Momentum physical wellness and health program

Legacy's model features three innovative, evidence-based structures that have varied learning approaches that meet the specialized needs for all students. Previously introduced in our revised mission statement, Legacy's neotraditional environment is a hybrid of combining today's innovative learning practices with proven and traditional back-to-basic teaching methodologies.

Students receive direct-teacher instruction in traditional classroom complemented with computer-based instruction designed to augment daily lessons and objectives. Legacy's model of classroom learning builds strong language arts, math and science foundation while simultaneously adding computer proficiency during the learning process. The intended outcome is to prepare 21st century students for academic and career success in an automated, sophisticated and competitive world. Today's diverse learning needs are anticipated and provided. Students' seat-time instruction and foundational subject-matter disciplines of core math, ELA, science and social studies are blended with a plethora of enrichment classes including extended recess time. In sum, required foundation classes are balanced by options to participate in the Mozart Performing Arts Program and the Momentum physical wellness and health program. Identical to our original Committee to Form's goals for the founding school, Legacy Traditional School – Southwest will have substantial outcomes including a five-star rating awarded by the Nevada Department of Education. The school will likely reach full capacity its first year of operations and sustain 95% ADA rate throughout the academic year. The school will maintain a 90% persistence rate and 95% teacher retention rate, excluding life events. Through a proven, school-wide RTI program, Legacy will work toward having 100% of general education students at or above grade level in all disciplines and 90% of all annual IEP goals met. The school will reclassify a minimum 30% of English Language Learners to full English proficiency on an annual basis. Students will be nurtured with principles of patriotism, responsible citizenship and age appropriate conduct. The instructional leadership support of the school will ensure 100% student engagement by developing teachers' capacity and validating a goal of 90% highly effective faculty rate as measured by teacher appraisal process. At a minimum, 90% of all parents/guardians will indicate that the quality of their child's education is excellent. The Board will help the school administration implement strategies and techniques to increase parent participation leading to an anticipated 100% parent involvement rate. 100% of parents will provide 12 hours of direct or indirect volunteer services each year. In collaboration and through joint-decision making efforts, all stakeholders will provide a safe, structured learning environment and the school will make an impact in the educational community leading to higher standards of K-8 education among all in the community. Finally, all indicators, measures, metrics, targets and ratings used in the Charter School.

⁴ "State Public Charter School Authority – Charter School Performance Framework." Charterschools.nv.gov. NV.gov, n.d. Web. 24 September

Performance Framework to measure the academic, financial, organizational and mission will be met on an ongoing basis.⁵ Reviewers seeking more information on our educational model for the expanded school may wish to refer to the section labeled “Academic Plan” beginning on page 19.

The values, approach and leadership accomplishments of your school or network leader and leadership team

The shared core values among all schools and leadership team at Legacy Traditional Schools are strong in their work ethic, integrity, responsible citizenship, discipline, teamwork, and honor. Legacy connects students with our nation's and Nevada's heritage, producing high-functioning, participatory citizens and responsible, astute consumers who are well-qualified to compete, contribute and succeed in today's complex global markets. Leadership is vital to a charter school. Therefore, the leadership team that will be hired by our Board will have proven resumes of elementary and junior high school academic, financial and organizational accomplishments. The ideal candidates will have exceptional technical, interpersonal and conceptual skills. The licensed leadership team will use a shared value, joint decision-making approach and will not deviate from the Board's adopted program of instruction or our policies/procedures. Additionally, they will comply with all rules and regulations of the United States Department of Education, Nevada Department of Education, Nevada State Public Charter School Authority, Nevada Revised Statutes and the Nevada Administrative Code. Finally, the leadership team will value our nation's heritage and instill within all stakeholders the traditional values of patriotism, honor and the sacred duties that come with citizenship.

Key supporters, partners or resources that will contribute to your expanded school's success

Achieving academic success as a system in diverse counties and communities in Arizona has drawn the attention of community members in Las Vegas. Beyond the School Board for Legacy Traditional School, key supporters in the Southwest area include: more than 2,000 families who expressed interest on the Legacy's first interest list. As well, the Southwest Master Plan Community Corporation, AdvancED of Nevada, Spalding International, Colliers of Nevada, Southern Nevada Home Builders Association, Argentum Partners, City of Henderson City Council, City of Henderson Chamber of Commerce, City of North Las Vegas, Las Vegas Chamber of Commerce and the General Counsel to the Office of the Governor and Governor Sandoval himself in this video: [Sandoval video on Legacy at 2017 SCAN Conference.mp4](#)

REFERENCES

Committee to Form's Response to the State Public Charter School Authority's 2015 Call for Quality Charter Schools Request for Proposals (2015) Charter School Proposal for Legacy Traditional School – Henderson.

⁵ "State Public Charter School Authority – Charter School Performance Framework." Charterschools.nv.gov. NV.gov, n.d.

Web. 24 September

2016 [http://charterschools.nv.gov/uploadedFiles/CharterSchoolsnvgov/content/Grocers/Performance%20Frame work.pdf](http://charterschools.nv.gov/uploadedFiles/CharterSchoolsnvgov/content/Grocers/Performance%20Frame%20work.pdf)

Meeting the Need- Targeted Plan

(1) Identify the community you wish to serve as a result of the expansion and describe your interest in serving this specific community.

After being invited by the Authority to submit an application for building a Legacy school in Nevada, Legacy began to circulate, a Legacy Traditional School “sign-up for locating a school in Nevada” through a digital interest list campaign. As a result, 2,000 potential parents/students identified themselves and information packs and communication began. Once residents’ addresses were mapped, parent meetings and communication began in particular locations, with the southwest valley being an area where parents told us they needed more schools. Particularly, the Enterprise Township showed the most interest. As one of fastest growing unincorporated county townships in Clark County with a population of over 108,000, it is the location of several sizeable master-planned communities such as Mountains Edge, Rhodes Ranch, Southern Highlands, Nevada Trails and Coronado Ranch. The future portends well for additional population growth with other smaller, stand-alone subdivisions typical of the Las Vegas Valley. In a short span of ten years from 2000-2010, Enterprise’s population grew from 14,676 to 108,481. The need for additional schools to serve this population is warranted. Total population is projected to grow by 17 percent by 2020. There are 12 elementary schools, three middle schools, two high schools, one preparatory school and a few private schools.

(2) Explain how your expansion model, and the commitment to serve this population, including the grade levels you have chosen, would meet the district and community needs and align with the mission of the SPCSA.

The southwest valley needs a proven educational provider delivering high-quality K-8 education for families with children in their formative years. Well-educated children is a known civic contributor to ensuring that area youth are locally educated through an effective school system -- and as students matriculate into high schools bringing with them the motivation to learn and perform well academically. Further, with the SPCSA’s mission to improve and influence public education in Nevada by sponsoring public charter schools that prepare all students for college and career success and by modeling best practices in charter schools, Legacy answers a direct need and parent demand for high-quality school choice in the southwest valley. Our commitment to serve this population is proven through our track record in educating nearly 15,000 students in Arizona (with 12 highest-rated K-8 schools) and now in North Las Vegas with its first Nevada school. Our research shows that the southwest valley’s profile -- its demographics, density and diversity -- actually mirror the communities we currently serve. This is evidence that where we have done well in educating diverse suburbia populations -- we expect to do the same for the southwest valley. With this reputation, we would go into an area with aggressive population growth and expect enrollments to be at capacity in the first year. Legacy’s record of graduating 8th graders who have been in accelerated programs is welcome in local area high schools who understand how important these students are to its graduation rate, scholarship acquisition and ultimately community involvement as they choose to stay in the community, attend local colleges and/or raise families.

As concerns the expansion model: in the public board meeting held on February 21, 2017, Legacy Traditional School’s Board unanimously voted to pursue expansion based on the growing number of parents on our Henderson interest list whose addresses were in the southwest valley. It became obvious that an area needing high-quality K-8 schools would be the Enterprise or southwest valley – clearly in need of additional K-8 public education choices. The academic needs of this community are currently not being met due to the overcrowding Clark County Public Schools and the alternative charter and private schools in the community with large waitlists. In an effort to improve public education in Nevada by preparing students for college and career success⁶, Legacy Traditional School expansion is prepared to help meet the needs of the estimated 30,000 current and future residents in the Southwest community with our proven K-8 differentiated education model.

CT Sewell Elementary School – Whole School Demographics (N=833)

- Title I School - Yes
- IEP – 18%
- FRL – 69%
- ELL – 7%
- American Indian – 1%
- Asian – 2%
- Black and African American – 12%
- Hispanic/Latino – 30%
- Pacific Islander – 1%
- Two or More Races – 8%
- White and Caucasian – 45%

B Mahlon Brown Junior High School - Whole School Demographics (N=978)

- Title I School - Yes
- IEP – 16%
- FRL – 56%
- ELL – 6%
- American Indian – 0%
- Asian – 0%
- Black and African American – 7%
- Hispanic/Latino – 28%
- Pacific Islander – 2%
- Two or More Races – 6%
- White and Caucasian – 54%

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Data for Southwest Pinecrest Academy and Lake Mead Christian Academy are unavailable for public review. New star ratings for Nevada schools will be delayed until December 2017.

Reviewers seeking more information on our commitment to serving the target population, i.e. a cross section of the local zoned school population or specific educationally disadvantaged populations may wish to refer to the section labeled “Academic Plan” beginning on page 19.

⁷ “Nevada Department of Education – Nevada School Performance Framework.” Nspf.doe.nv.gov, n.d. Web. 24 September 2016
<http://nspf.doe.nv.gov/>

Meeting the Need- Growth Rate and Rationale

(1) Describe the school’s six-year growth plan for developing new schools in Nevada and other states. Please describe the proposed scope of growth over the next 6 years, including both the schools that the campuses the school has already been approved to open, those it is currently applying to open and any additional campuses that it anticipates applying to open in the next six years (number of campuses, locations, proposed six-year enrollment projections, and grade configuration/type of schools).

Legacy will continue to grow both within and outside of Nevada. In Arizona, Legacy added three (3) new campuses to its network in 2016, making a total of 12 campuses within Arizona. Legacy further plans to add one or two additional campuses in Arizona over the next six years. In Nevada, Legacy anticipates opening a total of five (5) campuses over the next six years. The first campus (North Valley) opened in August 2017. The second campus (Cadence) will open in 2018. It is anticipated that campuses three through five will open from 2018 through 2020. Legacy is always exploring the possibility of expanding into other states where there is a need for high quality education, including Texas and Colorado. All campuses will serve grades kindergarten through eight. The chart below reflects Legacy’s anticipated growth over the next six years.

Nevada Enrollment						
Year	17-18	18-19	19-20	20-21	21-22	22-23
Number of K-8 Schools	1	2	3	4	5	5
Number of High Schools	0	0	0	0	0	0
Total Schools	1	2	3	4	5	5
Student Enrollment	1,230	2,680	4,350	5,800	7,250	7,250

Network estimate based on full capacity of 1,450 per school

Year	17-18	18-19	19-20	20-21	21-22	22-23
Number of K-8 Schools	13	16	17	18	19	19
Number of High Schools	0	0	0	0	0	0
Total Schools	13	16	17	18	19	19
Student Enrollment	14,600	18,270	20,450	22,300	23,900	23,950

a. Provide a rationale for the proposed six-year growth plan; for example, how the school determined the appropriate pace and scope of the proposed growth and why the school is well-positioned to implement the growth plan. If locating in a new community within your present county of location or a new county within Nevada, please explain the rationale for the geographic expansion. If planning to operate new campuses in other states, please explain the rationale for that expansion.

Legacy started its network of schools over 10 years ago. Since then, it has grown by 13 new schools and more than 14,000 students. This represents a growth rate of 2-3 new schools per year. Legacy has demonstrated its consistent ability to grow at this rate. Therefore, the growth proposed above (1-2 schools per year in Nevada) is a conservative growth plan that Legacy has complete confidence in executing. Due to the larger campus

enrollments at its campuses, Legacy prefers to locate each of its campuses at least 5 miles away from each other. This ensures there is sufficient local educational demand to fill Legacy schools. Legacy has identified the following submarkets within the Las Vegas metro area for future schools: 1. North Las Vegas; 2. Southwest; 3. Henderson; 4. Southwest Vegas; and 5. Centennial Hills. Legacy's early communication in Las Vegas has discovered very strong demand for Legacy education across the entire Las Vegas metro area. To date, more than 2,000 families have expressed serious interest in enrolling their children at a Legacy campus—nearly all of those within the five submarkets described above. Once Legacy begins formal marketing efforts, the school system anticipates even more significant enrollment interest—easily enough to warrant multiple schools in Las Vegas.

(2) Specifically identify the key risks associated with this growth plan and describe the steps the school is taking to mitigate these risks. Respondents should demonstrate a sophisticated and nuanced understanding of the challenges of replication in general and as they relate specifically to their school growth plans based on current and historic experience of charter school management organizations and similar types of multi-site social enterprises and non-profit and for-profit organizations. The response should detail specific risks and explain how the school will minimize the impact of each of these risks, and ideally provide contingency plans for them. Examples may include:

(a) Inability to secure facilities/facilities financing;

Legacy has already mitigated against this risk by securing a team of sophisticated, well-funded investors, lenders, and real estate brokers to help identify and fund Legacy campuses. In fact, Legacy has very successfully used these parties multiple times in the past for various campus transactions. These key players include:

- Colliers International (<http://www.colliers.com/en-us>) – Colliers works closely with Legacy and Legacy's project manager to carefully analyze the market and identify the best potential sites for school development. Colliers' Phoenix office is the most experienced charter school brokerage team in the state. They have teamed with Colliers' Las Vegas office to represent Legacy's interests. Colliers is the third largest real estate firm in the world. Colliers was responsible for identifying and securing the most recent Legacy locations for new schools in Arizona and for securing all of Legacy's proposed sites in the Las Vegas area.
- Piper Jaffray & Co. (<http://www.piperjaffray.com/>) – Bruce Sorenson of Piper Jaffray and Co. has been Legacy's partner for underwriting long-term commercial loans backed by tax-exempt bond financing for over five years. Piper Jaffray has previously financed or refinanced all of Legacy's campuses, which amounts to approximately \$250 million of financing. The financing to acquire the land and construct the buildings for the Cadence campus was secured and funded in September 2017.
- CLI Capital (<http://www.clicapital.com/>) – CLI has been a great construction financing partner on two Legacy campus projects in Arizona. While more expensive than commercial loans underwritten by Piper Jaffray Co. described above, they are easy to work with and should the need arise, they are ready and willing to provide financing for Legacy campuses. CLI has funded the development of hundreds of millions of dollars' worth of charter schools throughout the United States. They work only with larger, experienced charter school operators and are a tremendous asset to the Legacy team. CLI has very deep funding capability and has committed to be a long-term partner of Legacy for as many schools as Legacy desires. (Legacy is happy to furnish a letter from CLI evidencing as much, if requested by the State of Nevada.)

(b) Difficulty raising philanthropic funding;

Legacy plans the financing and operations of all of its campuses without the assumption of need for philanthropic funding. In other words, all of Legacy's campuses are sustainable relying only on standard State and Federal sources of funding. Legacy may source additional philanthropic funding, but it certainly does not rely on those sources for viable financial models.

(c) Insufficient talent pipeline/difficulty recruiting faculty;

Legacy first seeks to fill its faculty positions with local qualified candidates (i.e., residents in and near Las Vegas). If insufficient resources exist, Legacy will recruit some of its existing faculty from current Legacy schools in Arizona who desire to relocate to Nevada (Legacy current employs nearly 600 faculty). If Legacy still cannot fill all open teaching positions, Legacy will recruit qualified instructors from out of state. Legacy annually attends job fairs in more than 10 states across the United States in order to fill its positions. Because of these careful, calculated efforts, Legacy fills all of its positions each year. As an example, Legacy successfully filled all of its 150+ open teaching positions (for 3 new campuses in Arizona and for other open positions at existing campuses) prior to the first day of school in July, 2016.

Recruiting strategies begin no later than the December prior to the start of school. All positions are posted and advertised on our website, Facebook, newspaper ads, google ads, local university job boards, and through the State Education Department's site. Legacy attends all local and some nation-wide job fairs from November through May to recruit the top Administrators and Teachers. Legacy assures its salaries and benefits are equal to or better than the neighboring school districts. Legacy hosts local Legacy job fairs to allow on-site interviewing and offers to be extended.

(d) Insufficient leadership pipeline/difficulty recruiting school leaders;

The Legacy school board, in cooperation with CFE Management Group, will be responsible for recruiting a school leadership team upon authorization. The school Principal will be the initial school leader selected. Through the management agreement, the Board delegates the supervision of the school Principal and oversight of daily operations to the CFE Management Group. The school Principal will report directly to the Chief Academic Officer for CFE for supervision and guidance. However, the Board reserves the right and authority to make any and all final decisions including decisions related to the Principals employment.

Legacy employs one principal and two assistant principals at each of its 12 Arizona locations. The express purpose for having two principals at each campus is to continually have many school leaders in training to become future principals at other, future Legacy campuses. Thus, Legacy is continually cultivating new leadership. Some of these leaders have already expressed interest in relocating to Nevada.

Regardless, Legacy will actively seek individuals within its current organization that consistently demonstrate strong leadership skills and have the potential to complement its mission and vision.

In terms of Legacy's leadership growth program, the first step in its secession plan is to inquire within Legacy's existing staff those individuals that are already in a leadership program or might be considering administrative positions in the future. Legacy reaches out to its current administrators for recommendations of future leaders and conduct formal and informal observations, when applicable. The Deputy Superintendent of Academics regularly meet with those staff members that are already in a leadership program to mentor and discuss further positions within the district.

Once potential leaders are identified, they are given many opportunities to demonstrate their abilities by participating in the following activities:

- Chairing an academic committee
- Overseeing school-wide events
- Becoming a team lead at the district or site level
- Participating on an interview committee
- Mentoring a struggling peer
- Completing assigned administrative tasks

Once an employee is assigned a leadership position, there is a support team of school leaders and district personnel that will mentor the new leader throughout the year by not only being readily available for any questions and concerns, but by checking in often to provide suggestions and support, when needed.

The Legacy Leadership Program will begin with multiple days of training that will include, policy and procedure review, job descriptions and responsibilities, effective communication, instructional leadership development and team building opportunities. These pre-service trainings provide the new leader with many of the tools they will need to successfully embark on their new position.

Teachers at Legacy will participate in intensive and engaging pre-service trainings at the beginning of each school year. These multi-tiered workshops explain the expectation of the position, review the requirement of school operations and provide a variety of professional development opportunities to fit the needs of the employee.

(e) Misalignment between the founding school and leader and new campuses and leaders, and;

Ensuring consistency and coherence of this mission and our vision at Legacy's current foundation school and schools we intend to expand is a shared responsibility among this Board, our Superintendent, our Principal and our EMO, CFE Management Group. The CFE Academic Team validates a variety of measures of all Legacy schools' operation's alignment to the mission their success including goal benchmark checks, regulatory compliance, the fidelity of the program of instruction and compliance with school policies and procedures during four scheduled site validation visits throughout the academic year. A scoring matrix and rubric are employed by Academic Team members during these visits to collect artifacts and observations that support evidence of projected goal attainment, compliance or areas requiring corrective action. Findings from these visits are reported to the school's superintendent and the school board.

(f) Ambiguous student performance outcomes and the need to curtail expansion if performance drops.

The Legacy Traditional School Board has the primary and ultimate responsibility for governing the corporate affairs, the charter school(s), and implementing the Legacy school program authorized by the open-enrollment charter and ensuring the performance of the students enrolled in its charter school in accordance with the Nevada Law. Should a school/grade/subgroup fall short of academic achievement expectations, a Performance Improvement Plan is implemented by the Board in cooperation with the assistance of CFE. A Performance Improvement Plan is collaborative strategy that specifically targets the performance issue(s) and outlines the specific action that will be taken. Academic accountability is one of the main responsibilities CFE offers local school boards with whom a management agreement is established. A talented group of licensed school administrators with decades of practical educational and instructional leadership experience makeup the Academic

Division of CFE. The chief function of this group is to work closely with the practitioners of the Legacy Schools to develop their effectiveness capacity and to ensure the fidelity of the school's charter. Should the data of the monitored progress of a school indicate that the school is at risk of not meeting academic expectations (either expressed or implied), one or all of two approaches are taken by CFE to correct the academic underperformance.

2. *Discuss lessons learned during the schools past replication efforts and those of any replicated school or organization from another jurisdiction. For example: specifically identify each challenges encountered and how the school addressed them, as well as how the school would minimize such challenges for the proposed campuses.*

While Legacy Traditional School has not yet built and opened its second campus approved in Henderson (Cadence), it did recently open its first campus in North Valley and challenges did come up that can be minimized going forward. Examples include the following:

- North Valley's start of school was after the start date for many surrounding schools. As a result, despite the incredibly strong enrollment demand, some families were not able to wait that long and enrolled at other nearby schools. For the next campuses the construction process has been planned to allow start dates consistent with surrounding schools, which will help minimize the dynamic seen at North Valley.
- Recruiting teachers for North Valley required a tremendous effort, and in that process a number of lessons were learned, including how to better fit in with the timing of contract renewal at other local schools. CFE has hired additional staff to focus on recruiting for the Legacy campuses in Nevada.
- Challenges were faced and addressed with regard to the enrollment process, Infinite Campus, and the enrollment audit conducted by Authority staff. The knowledge gained by staff at both Legacy and CFE through those processes at North Valley are positioned to minimize enrollment challenges for future Legacy campuses in Nevada.

Meeting the Need- Parent and Community Involvement

(1) Describe the role to date of any parents, neighborhood, and/or community members involved in the proposed expansion of the school.

Legacy Traditional School – Southwest board members, are beginning to plan the parent and community-leader outreach strategy. This will involve holding multiple parent/community meetings near the Cornelius Kelly Avenue and Inflection Street location hosted by Legacy leadership and staff. The purpose is to inform those interested about the school’s K-8 program of instruction, its history and testing track record – and share the school’s philosophy of learning when it comes to student success and academic achievement. School representatives will present the full Legacy experience via PowerPoint and handouts, developing a two-way informational flow of questions and answers. For initial communication dissemination, email and a school Facebook page has been created to answer basic questions, invite engagement and share notifications of future meetings and developments. These are the foundational elements in building a cohesive, engaged and enthusiastic school community.

(2) Describe how you will engage parents, neighborhood, and community members from the time that the application is approved through the opening of the new campus(es) or grade levels. What specific strategies will be implemented to establish buy-in and to learn parent priorities and concerns during the transition process and post opening?

As the school plans develop, Legacy board members and Legacy staff will continue to assess and delve into the needs of the surrounding community to determine how the school can best serve. This in-depth strategy will involve (1) Direct interaction with parents and their children by inviting potential parents and community members to attend meetings so that knowledge about the school, its approach to learning and the culture are represented accurately. (2) Open- forum, regular meetings will be hosted in the area -- inviting all community members and community-leaders with the goal of establishing buy-in, collecting feedback to act upon, allowing concerns to surface and dialogue to be exchanged. (3) During the transition process and post opening, familiarizing and socializing the surrounding community about Legacy and its respected reputation as the state’s highest-performing network of schools in Arizona, also ranked #1 among parents, will be accomplished through traditional “awareness” marketing and paid advertising – building local familiarity and affinity for the school. Parents will be encouraged to invite extended family or other family friends to attend all meetings, and the same will apply to community leaders and educational advocates who are interested in knowing more. (4) Surveys, both online and in focus groups will be conducted to gather empirical and anecdotal information – allowing various groups to rate and rank what is important to them insofar as their academic priorities for their children and the amenities that the school may offer. All information and insight gained will be documented by Legacy staff and will be used to further define the roles and responsibilities of staff as they begin to define job descriptions and specify how they may incorporate the concerns or requests aired in meetings into the overall plan, showing accountability as an outcome. (5) Follow-up, pre-opening and post-opening parent and community meetings will be planned to download the information gathered at the first-round and subsequent meetings, allowing staff to share how the concerns or viewpoints are being accommodated and the timelines assigned. The robust communication plan for these parent and community-leader informational meetings will employ email, social media platforms, community visits, flyers and telephoning in order to build trust among those unfamiliar with Legacy and to enlighten them further about the potential opportunity awaiting them as a founding family in a new Legacy school. These techniques in building trust and familiarity have proven successful in building 12 Legacy school communities in Arizona (and one in North Las Vegas) and continual communication with

enrolled families through all modes and channels, both pre- and post-opening is key to building strong parental support that assures parents they have made a good decision in choosing Legacy for their children's educational needs.

- (3) *Describe how you will engage parents in the life of the expanded school (in addition to any proposed governance roles). Explain the plan for building family-school partnerships that strengthen support for learning and encourage parental involvement. Describe any commitments or volunteer activities the school will seek from, offer to, or require of parents.*

As part of the Legacy Traditional School – Southwest mission statement: “. . . together with supportive parents”, -- these words as descriptors are made reality by asking parents to give a minimum of 12 volunteer hours per family per year. This request is detailed in the student handbook and outlined at all parent meetings – and requires a state fingerprint card. Parent involvement can range from volunteering in classrooms to designing bulletin boards to helping with the staging for annual school musicals. The opportunities are endless and hours are tracked for quantifying annually.

Legacy will create a Parent-Teacher Organization (PTO) within the first few months of the school's start – and will promote its start-up prior to the school opening to identify early leaders and adopters. Parent groups add significantly to the positive community atmosphere at Legacy schools and will help organize community projects and events for Legacy families to support. Organizing family movie nights -- which may be fundraisers for community non- profits or families/students in need -- is but one example which demonstrates how Legacy PTOs get involved in supporting other causes outside of the school. Spring carnival events and fall festivals allow exposure for surrounding businesses and a host of vendors to benefit from Legacy in the neighborhood. Additionally, the school invites local clubs and businesses to offer after-school clubs on-site for students and families. Finally, on an academic level, the school administration expects to work closely with local high schools to build and provide transfer transcripts which align with existing systems allowing for seamless promoting of 8th graders. As well, the Legacy school calendar will closely mirror the local high school(s) so that families with children in multiple grade levels or schools may have a cohesive school-break schedule.

- (4) *Discuss the community resources that will be available to students and parents at the expanded school. Describe any new strategic partnerships the expanded school will have with community organizations, businesses, or other educational institutions that are part of the school's core mission, vision, and program other than dual-credit partners discussed in subsequent sections. Specify the nature, purposes, terms, and scope of services of any such partnerships, including any fee-based or in-kind commitments from community organizations or individuals that will enrich student-learning opportunities. Include, as Attachment 11, existing evidence of support from new community partners such as letters of intent/commitment, memoranda of understanding, and/or contracts.*

All Committee to Form members are residents of Nevada. The state, the county and city are home to known each member. We have identified organizations and consultants in the community that have and are becoming partners in planning and establishing our school. Achieving academic success as a system in diverse counties and communities in Arizona has drawn the attention of community members in Las Vegas. Beyond the School Board for Legacy Traditional School, key supporters in the Southwest area include: 700 Parents on the site area interest list, the Southwest Master Plan Community Corporation, AdvancED of Nevada, Spalding International, Colliers of Nevada, Southern Nevada Home Builders Association, Argentum Partners, City of Henderson City Council, City of Henderson Chamber of Commerce, City of Las Vegas Chamber of Commerce and

the General Counsel in the Office of the Governor. Governor Sandoval himself has spoken of Legacy's entrance into the state in helping build the New Nevada. Sandoval remarks at 2017 CSAN Conference.mp4

Jointly, we are engaging the community and building relationships with businesses and residents in an effort to share information about our school, Legacy Traditional School – Southwest. Legacy Traditional School – Southwest believes an important step in developing a positive school culture is the connection of our values with those of the community. Personnel will identify high-engagement parent/public events where we can meet the community, introduce programs, develop relationships, and learn more about the culture of our new community. We will participate in and host forums where stakeholders learn about Legacy Traditional School – Southwest and have the opportunity to share their connection with our philosophy. If selected by the Board, the EMO, CFE Management Group's marketing personnel will develop these forums as an additional means to connecting with the community. Prior to opening, the site administrators will hold regular meetings for parents and community members to ask questions, share concerns, and contribute their suggestions for consideration.

- (5) *Describe the school's ties to and/or knowledge of the target community. How has the school learned from and engaged with this community to date? What initiatives and/or strategies will you implement to learn from and engage the neighborhood, community, and broader city/county?*

All Committee to Form members are residents of Nevada and the majority are residents of North Las Vegas, hence each member understands the needs of the local community and are vested in the success of Legacy and all educational providers in the area. Specific to North Las Vegas, we have identified organizations and consultants in the community that have and are becoming partners in planning and establishing the school. This will include submitting Request For Proposals to local businesses as work progresses to open the school.

- (6) *Identify any organizations, agencies, or consultants that are partners in planning and expanding the school, along with a brief description of their current and planned role and any resources they have contributed or plan to contribute to the school's development. If the school is new to this county, describe how your previous work has prepared you to establish relationships and supports in this new community.*

Prior to site location selection, CFE staff assisted the Committee to Form through analysis and study of numerous sites, assuring that the chosen community has the need, appropriate density and ages to meet the criteria to fill a Legacy school. Some of those initial organizations and entities are listed:

Nevada's AdvancED office has offered guidance and direction for the Legacy Traditional School network expansion into the State.

Colliers Nevada and Southern Nevada Home Builders Association have provided leadership and assistance by examining land availability and build-out options within and surrounding Las Vegas.

Argentum Partners and the State Public Charter School Authority have assisted Legacy Traditional School in many aspects of our early formation.

Local libraries, hotels and restaurants will be sites of parent meetings until the school is built with local vendors providing food and entertainment.

Legacy's experience and success in opening 12 campuses throughout Arizona over the past decade, and one campus in North Las Vegas has been reliant upon local-area resources. The same

tact of utilizing local North Las Vegas expertise and talent in building community awareness and support for the school, its families and students will be adopted. Initial community events will be high-engagement -- with the infrastructure provided by local vendors and businesses. This allows school leaders to meet community leaders, introduce programs, develop relationships, and gradually, fully integrate into the culture of Southwest Las Vegas.

Prior to opening, the school will hold regular forums for parents and community members to ask questions, share concerns, and contribute their suggestions for consideration. These are forums where any community member can learn about Legacy Traditional School- Southwest and have the opportunity to share their connection with our philosophy. Communication and marketing staff will develop robust social media content to augment these events and create an additional means to connect with the community and have the community feel that Legacy is a vital and important cornerstone.

[Remainder of page intentionally left blank]

Academic Plan- Mission and Vision

The mission of your school should describe the purpose of your school, including the students and community to be served and the values to which you will adhere while achieving that purpose. The vision of your school should describe what success looks like for students, for the school as a whole, and for any other entities that are critical to your mission. The mission and vision statement should align with the purposes of the Nevada charter school law and the mission of the State Public Charter School Authority and serves as the foundation for the entire proposal.

(1) Explain whether the proposed mission and vision for the network is different from the existing school's mission and vision and how they differ. Describe the reasoning behind any modifications. Explain whether the mission and vision outlined will replace the current mission and vision of the charter holder, or if the school proposes to complement a broader organizational mission and vision with campus or grade-level specific variants. How will the entity as a whole ensure consistency and coherence of its mission and vision?

Legacy Traditional Schools' revised mission for the expanded school is to provide all students with opportunities, leadership, guidance, and support to achieve academic excellence in a safe, neotraditional learning environment, taught by caring, knowledgeable and highly effective educators in cooperation with supportive, involved families. The founding school's mission was "Legacy Traditional School will provide motivated students with an opportunity to achieve academic excellence in an accelerated, back to basics, safe learning environment taught by caring, knowledgeable and highly effective educators in cooperation with supportive, involved families. We believe that our new expansion school's mission is built on the foundation school's mission and amended based on the collection of many artifacts in the community as well as the guidance and recommendation of SPCSA staff and Board members. Unlike any K-8 school in the community, Legacy Traditional School will meet the diverse needs of the parents in Henderson by providing them with an opportunity to choose to enroll their child in a school with a differentiated educational model. Legacy's model features three innovative, evidence-based structures that have varied learning approaches that meet the specialized needs for all students. Previously introduced in our revised mission statement, a neotraditional learning environment is a hybrid of modern best practices and traditional, back-to-basics methodologies. The structure of neotraditional learning environment in a Legacy Traditional School offers features three models:

- The blend of direct teacher instruction with computer-based instruction, incorporated with Depth and Complexity differentiated instruction strategies
- The Mozart Performing Arts Program
- The Momentum physical wellness and health program.

Ensuring consistency and coherence of this mission and our vision at Legacy's current foundation school and schools we intend to expand is a shared responsibility among this Board, our Superintendent, our Principal and our EMO, CFE Management Group. The CFE Academic Team validates a variety of measures of all Legacy schools' operation's alignment to the mission their success including goal benchmark checks, regulatory compliance, the fidelity of the program of instruction and compliance with school policies and procedures during four scheduled site validation visits throughout the academic year. A scoring matrix and rubric are employed by Academic Team members during these visits to collect artifacts and observations that support evidence of projected goal attainment, compliance or areas requiring corrective action. Findings from these visits are reported to the school's superintendent and the school board.

Previously articulated in our Executive Summary, the vision of Legacy Traditional Schools is to

“Positively impact the education of every student”. Our vision has not changed from our founding school proposal nor have we deviated from our vision’s destination. After attending many community events and providing community parent information presentations, we are strongly motivated to execute this vision with fidelity based on the need we see in our state.

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Academic Plan- Curriculum and Instructional Design

The framework proposed for instructional design must both reflect the needs of the anticipated population and ensure all students will meet or exceed the expectations of the Nevada Academic Content Standards.

(1) Historical Performance

(a) *Performance Data: schools are only eligible to complete the amendment request and business plan if the existing schools meet the Authority's eligibility criteria; these criteria reflect a proven academic track record of success with Nevada students and our operating expectations or similar performance in another state. However, a school is welcome to provide any additional historical academic performance metrics that fall outside of the operator's contractual performance plan (e.g. average student growth on an adaptive test such as ACT Aspire, NWEA MAP, SCANTRON, Renaissance Learning's STAR, etc.). If provided, describe student performance on these metrics. **Please only provide data in vendor-produced score reports and note that the Authority may require additional time and resources to review and vet such data.***

Arizona public school students in grades 3 through 11 take AzMERIT. Students in grades 3 through 8 take an assessment in ELA and mathematics at their grade level. Students began taking AzMERIT assessments in the spring of 2015 and will continue the spring of each school year.

The information below summarizes the 2016-2017 AzMERIT results for the Legacy Schools in Arizona.

School/State	2016-2017 School Year
	Percentage of Students Passing
Tested – Math	Grades Tested – ELA

State of Arizona – Math 3rd grade 47%, 4th grade 47%, 5th grade 47%, 6th grade 41%, 7th grade 34% and 8th grade 28%

Arizona Legacy Traditional Schools – Math 3rd grade 71%, 4th grade 66%, 5th grade 74%, 6th grade 67%, 7th grade 52% and 8th grade 69%

State of Arizona – ELA 3rd grade 43%, 4th grade 48%, 5th grade 44%, 6th grade 41%, 7th grade 44% and 8th grade 34%

Arizona Legacy Traditional Schools – ELA 3rd grade 69%, 4th grade 70%, 5th grade 64%, 6th grade 59%, 7th grade 66% and 8th grade 57%

(b) *Interventions: Please explain any past performance that has not met the organization's expectations. How was the underperformance diagnosed, how were appropriate intervention(s) determined, and how are they being implemented? What are the key areas in which existing schools/campuses need to improve, and what are the priorities to drive further success?*

All assessments have been created, tested, edited, enhanced and now proven valid and reliable to be an accurate measure of student learning needs as well as teacher effectiveness (based on past experience in Arizona Legacy Schools). The interim academic assessments are directly aligned to Legacy's curriculum, program of instruction and national common core standards. Currently,

Legacy utilizes Galileo Comprehensive Benchmark Assessment (CBAS) as a progress monitoring assessment tool. Similar to the annual state assessments, the interim academic assessments are utilized in the teacher performance framework and impact the appraisal of the teacher. Grade level and content lead teachers of all Legacy Traditional Schools meet with CFE educational experts each year to review the interim academic assessments and enhance the assessments if necessary based on data. Through Professional Development opportunities and individualized Teacher Support Plans, teachers receive support from CFE officials, site Instructional Coaches and Principals on all instructional best practices including checking for understanding and student data analysis.

The Legacy Traditional School Board has the primary and ultimate responsibility for governing the corporate affairs, the charter school(s), and implementing the Legacy school program authorized by the open-enrollment charter and ensuring the performance of the students enrolled in its charter school in accordance with the Nevada Law. Should a school/grade/subgroup fall short of academic achievement expectations, a Performance Improvement Plan is implemented by the Board in cooperation with the assistance of CFE. A Performance Improvement Plan is collaborative strategy that specifically targets the performance issue(s) and outlines the specific action that will be taken. Academic accountability is one of the main responsibilities CFE offers local school boards with whom a management agreement is established. A talented group of licensed school administrators with decades of practical educational and instructional leadership experience makeup the Academic Division of CFE. The chief function of this group is to work closely with the practitioners of the Legacy Schools to develop their effectiveness capacity and to ensure the fidelity of the school's charter. Should the data of the monitored progress of a school indicate that the school is at risk of not meeting academic expectations (either expressed or implied), one or all of two approaches are taken by CFE to correct the academic underperformance.

1. School-wide Performance Improvement Plan
2. Individual Support Plan

With the assistance of CFE, a Performance Improvement Plan (PIP) will be created by the school administration, adopted by the school Board, and implemented in a school that does not meet school-wide academic achievement expectations and/or school-wide goals. The PIP outlines specific goals, strategies/interventions, benchmarks, responsible parties, timelines, and budget, evaluation of the implementation of the intervention as well as the implementation process and the progress reporting structure to the school Board.

With the assistance of CFE, an Individual Support Plan is created by the school administration for Legacy teachers based on an underperforming classroom or individual student academic achievement. The Support Plan is offered to teachers in need of additional instructional support. Similar to the PIP, the Support Plan outlines specific goals, strategies/interventions, benchmarks, responsible parties (including the school's instructional coach), timelines, and an evaluation process that included instructional observations by CFE, as well as the implementation process and the progress reporting structure.

Specific categories of a Support Plan that the school administration can target to guide immediate academic progress include:

Preparation: Design, Plans, and Analyses Data for Instruction Management: Creates and Maintains a Learning Climate Instruction: Implements and Manages Instruction and Assessment

CFE works in collaboration with the school administration to fully execute the PIP and to support teachers. CFE provides an extensive amount of tools and resources (including "School-

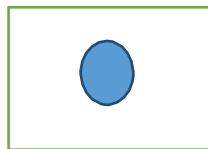
Turnaround” experts) to any school or teacher that is threatened by academic underperformance. In our experience, being pro-active is the best tactic to avoiding school improvement sanctions. Therefore, CFE closely monitors the progress of all managed schools. CFE utilizes the Legacy Traditional School Validation Process and the Central Office Data Dashboard to monitor progress toward goals and expectations of all schools.

(2) *Academic Vision and Theory of Change*

(a) *Model Non-Negotiables: What are the key non-negotiables (i.e. the key school design components, policies, practices, etc. that underlie school culture and academic outcomes) of your school model? Please include details about the critical elements that are constant across the organization's schools and those that may vary. Discuss any campus-level autonomies in implementing the educational plan.*

The overarching “non-negotiable” in our organization is standardized policies, procedures and expectations for ALL Legacy schools in the organization. This request for school expansion is a request to replicated what we are doing at one campus to a new campus and produce the same high achievement results.

Variations of campus-level autonomy in implementing the educational plan do exist and are supported. We refer to this as “The Circle in the Box.” The Circle in the Box is a management philosophy that grants site management autonomy and encourages campus-level administrators to venture outside the circle, a symbol of an organizational negotiable. The box represents the organizations non-negotiable.



(3) *Performance Management*

(a) *Measuring Progress: Describe the school's approach to performance management across the network and with individual campuses, including the systems used to measure and evaluate both academic and non-academic performance of each site and of the network as a whole. What performance management systems, processes, and benchmarks will the school use to formally assess this progress? Explain how the school addresses underperformance and describe the corrective action plan procedures.*

CFE hosts a centralized data warehouse named, Data Dashboard. Longitudinal operational and academic data from all CFE Legacy Traditional Schools is stored in this warehouse. CFE administrators monitor school goal progress based on each school’s monthly data entries as well as identify trends to be analyzed, diagnosed, presented and discussed during monthly school leadership meetings. School Principals can access their data on the dashboard in addition to the data of other Legacy Schools.

Data collected from the Validation Process and Data Dashboard can lead to a PIP and/or a Development Plan. Should Legacy Traditional School fail to meet established goals, a School Corrective Action Plan will be created by the CFE in collaboration with the Board established education committee and presented to the school Board for adoption consideration. A School Corrective Action Plan is an extension of a PIP with added strategic change and expressed

consequences for ongoing underperformance. CFE will assign a school improvement expert, “Change Agent” to provide on-site coaching and mentoring to any school on a Corrective Action Plan. Additional School Validation visits will be scheduled and coordinated with the Change Agent. The CFE Change Agent will provide a report on the progress to the school Board and attend Board meetings to provide status updates and objective recommendations to the school Board for sustainable improvement.

The Legacy Traditional School Board has the primary and ultimate responsibility for governing the corporate affairs, the charter school(s), and implementing the Legacy’s school program authorized by the open-enrollment charter and ensuring the performance of the students enrolled in its charter school in accordance with the Nevada Law. Should a school/grade/subgroup fall short of academic achievement expectations, a Performance Improvement Plan is implemented by the Board in cooperation with the assistance of CFE. A Performance Improvement Plan is a collaborative strategy that specifically targets the performance issue(s) and outlines the specific action that will be taken. Academic accountability is one of the main responsibilities CFE offers local school boards with whom a management agreement is established. A talented group of licensed school administrators with decades of practical educational and instructional leadership experience makeup the Academic Division of CFE. The chief function of this group is to work closely with the practitioners of the Legacy Schools to develop their effectiveness capacity and to ensure the fidelity of the school's charter. Should the data of the monitored progress of a school indicate that the school is at risk of not meeting academic expectations (either expressed or implied), one or all of two approaches are taken by CFE to correct the academic underperformance.

1. School-wide Performance Improvement Plan
2. Individual Support Plan

With the assistance of CFE, a Performance Improvement Plan (PIP) will be created by the school administration, adopted by the school Board, and implemented in a school that does not meet school-wide academic achievement expectations and/or school-wide goals. The PIP outlines specific goals, strategies/interventions, benchmarks, responsible parties, timelines, and budget, evaluation of the implementation of the intervention as well as the implementation process and the progress reporting structure to the school Board.

With the assistance of CFE, an Individual Support Plan is created by the school administration for Legacy teachers based on underperforming classroom or individual student academic achievement. The Support Plan is offered to teachers in need of additional instructional support. Similar to the PIP, the Support Plan outlines specific goals, strategies/interventions, benchmarks, responsible parties (including the school’s instructional coach), timelines, and an evaluation process that included instructional observations by CFE, as well as the implementation process and the progress reporting structure.

Specific categories of a Support Plan that the school administration can target to guide immediate academic progress include:

- Preparation: Design, Plans, Analyses Data for Instruction
- Management: Creates and Maintains a Learning Climate
- Instruction: Implements and Manages Instruction and Assessment

CFE works in collaboration with the school administration to fully execute the PIP and to support teachers. CFE provides an extensive amount of tools and resources (including “School-Turnaround” experts) to any school or teacher that is threatened by academic

underperformance. In our experience, being pro-active is the best tactic to avoiding school improvement sanctions. Therefore, CFE closely monitors the progress of all managed schools. CFE utilizes the Legacy Traditional School Validation Process and the Central Office Data Dashboard to monitor progress toward goals and expectations of all schools.

Legacy Traditional School's Board is working with a well-established EMO, CFE Management Group. This Educational Management Organization (EMO) currently manages all twelve Legacy Traditional Schools located in Arizona for their Board and has consistently produced strong enrollment and excelling academic results. The governing board of Legacy has chosen CFE Management Group, LLC ("CFE") as the EMO based on the full range of services provided and the highly successful track record of managing the other Legacy campuses. CFE has established a proven track record in the following areas: curriculum development, teacher training, marketing, financial services, human resource services, information systems, facilities management, food service management, and grant compliance. It would be impractical and cost-prohibitive for a charter school to provide that full range of services in-house.

(b) Closure: Describe the conditions that would cause the school to petition the Authority close a consistently low performing campus. Be specific about threshold metrics the school would use to inform its decision.

When the school consistently performs below the local district, county & state from an academic standpoint, the school would petition the Authority to close. The school will use the state's annual high stakes assessment as the measure and well as the star rating.

(c) College Readiness (HS Only): Describe the mechanisms that the school employs to accurately, reliably, and consistently track college acceptance, enrollment, and persistence rates. If historical data is available on college acceptance, enrollment, and/or persistence rates, please include it. Cite the percent of total alumni for which the school has data on each metric. If data is not available, please include plans to create mechanisms to accurately, reliably, and consistently track student acceptance, enrollment, and persistence rates.

Legacy Traditional School – Southwest will not offer a secondary education at this time. Therefore, this question is not applicable for this application.

(d) Readiness to Replicate: What academic, financial, and operational metrics does the school and its Board use to determine readiness for replication?

Currently, our "Readiness to Replicate" academic, financial and operational metrics are based on the Arizona Legacy school's frameworks. The academic evidence we used to determine our capacity to replicate can be reviewed by application readers on page 24 and also based on the last year Arizona implemented labels for school performance, 2014. Each school in the Legacy network was rated "A." The financial evidence we used to determine our capacity to replicate can be reviewed by this application reader on Attachment 10, 21-24. The operational evidence we used to determine our capacity to replicate is based on data and artifacts we collected from the Legacy schools located in Arizona including; over 12,000 now currently enrolled in twelve (12) schools in the state, large waitlists, 87% student retention (re-enrollment) rate, voted best school in for three consecutive years, parent satisfaction survey results and the fact that there are more than 600 certified teachers employed by the organization. The organization utilized a national teacher recruitment process to make certain that each of their 12,000 students are educated by a certified teacher of record.

REFERENCES

Committee to Form's Response to the State Public Charter School Authority's 2015 Call for Quality Charter Schools Request for Proposals (2015) Charter School Proposal for Legacy Traditional School – Henderson.

[Remainder of page intentionally left blank.]

Academic Plan- Programs of Distance

Legacy Traditional School-Southwest will not offer a Program of Distance. Therefore, this question is not applicable for this application.

[Remainder of page intentionally left blank.]

Academic Plan-Pre-Kindergarten Program

Legacy Traditional School-Southwest will not offer a Pre-Kindergarten Program. Therefore, this question is not applicable for this application.

[Remainder of page intentionally left blank.]

High School Graduation Requirements and Postsecondary Readiness

Legacy Traditional School-Southwest will not offer a High School. Therefore, this question is not applicable for this application.

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Special Populations- Special Education

Pursuant to State and federal law, SPCSA schools are required to serve the needs of all students in special populations. Beginning in the 2017-17 school year, the State of Nevada will switch to a weighted formula for special education. For the first time, this will provide for equitable special education funding across all Nevada public schools. Over time, this will necessitate current SPCSA-sponsored charter schools moving from a defined continuum of service to a broader continuum of services. All operators submitting amendment requests to the SPCSA after the conclusion of the 2015 Legislative Session should plan on offering students a broad continuum of services.

The SPCSA operates under the following principles with regards to special populations of students: SPCSA schools serve all eligible students. SPCSA schools do not deny the enrollment of any student based on needs or disability.

- 1. SPCSA schools are to ensure streamlined access for all students requiring special programs.*
- 2. SPCSA schools develop programs to support the needs of their students.*
- 3. SPCSA schools do not counsel or kick any students out.*
- 4. SPCSA schools utilize best practices to expose students to the most inclusive environments appropriate.*
- 5. If needed, an SPCSA school is responsible for developing more restrictive placements to meet the needs of the highest needs students, including but not limited to clustered placements in consortium with other charter schools.*
- 6. SPCSA schools are responsible for providing high functioning, trained special education teams, which focus on student advocacy and high expectations. IEP teams (including school's leadership) make placement decisions at IEP meetings. Decisions are made based on evidence/data to support what is best for the student.*

- (1) *Track Record: Please explain the extent to which the board and leadership team (instructional leader, etc.) has experience working to achieve high academic outcomes of students with disabilities, including students with mild, moderate, and severe disabilities.*

Legacy Traditional School (Legacy) currently operates twelve (12) K-8 charter schools in Arizona. In 2013, Legacy was approached by the Arizona Department of Education (ADE) because, upon review of academic outcome data for students with disabilities, Legacy was identified as one of the highest performing schools in the state. Termed "High Flyers," Legacy is part of small group of charter schools and school districts from across Arizona who have consistently achieved high outcomes for students with special needs.⁸ CFE's Deputy Superintendent of Exceptional Student Services, Amada Buda served as a founding member on the High Flyer committee with ADE. She has co-presented with ADE at Statewide conferences, including the 2015 ADE's Teacher's Institute to, share Legacy's success, and she helped ADE get awarded the Federal Office of Special Education Program's State Personnel Development grant. Under Ms. Buda's leadership, the Special Education Departments of all 12 Arizona LTS campuses have earned the highest ranking possible on the PEA Determinations, and, as a result will be monitored at the most independent level for the 2017-2018 school year. As a result of Legacy's unswerving compliance and academic achievements, ADE partnered with Legacy to pilot a new state audit structure.

⁸ "Arizona Department of Education – Rising Student Achievement for Students with Disabilities: Characteristics of Successful Districts." <http://www.azed.gov/special-education/files/2015/09/big-6-article-final-systems.pdf> azed.gov, n.d. Web. 24 September 2016

CFE's Exceptional Student Services Leadership Team is ripe with talent and experience to support the teachers and service providers who deliver specially designed instruction to students with a wide range of disabilities. The EMO's Exceptional Student Services / Special Education Department has an extensive background working with students with both high incidence and low incidence disabilities, and they have experience that spans across the continuum of services from inclusion to self-contained programming to private placement. The team has experience with students who have extreme behavioral and social/emotional needs, including crisis intervention and interaction with behavioral health and juvenile justice personnel. Legacy's Speech Pathology Team, has expertise in all areas of communication and a particular strength assistive technology and augmentative communication. They were awarded the AZ-Tech IDEA Assistive Technology grant for the 2015-2016 school year. The team also has a lengthy background in supporting students with autism. Legacy's School Psychology Team has implemented a cross-battery assessment approach in order to dig deeply into the evaluation data to clearly identify each student's educational needs. Their expertise allows Legacy schools to correctly identify, place, and serve all students with disabilities in the least restrictive environment.

As a service provider for the Legacy Traditional School – Nevada entity, the CFE Leadership Team will meet the beliefs of our Board and train each school's site leadership team, Special Education team, faculty and Superintendent to achieve the same results and implement a structured accountability and improvement plan if our entity is ever non-compliant with our charter, IDEA, NRS, NAC and/or expectations expressed by our authorizer, SPCSA.

(2) Identification: Describe in detail the school's Child Find process. How will the school identify students in need of additional supports or services?

Legacy Traditional School will screen all new students within 45 calendar days of enrollment. Students will be screened in the following areas: vision, hearing, primary home language, communication, cognition, academic achievement, adaptive development, social/emotional skills, and fine and gross motor skill development. A comprehensive review of educational records will be conducted to identify potential gaps in instruction, performance and/or attendance concerns, and any documented supports related to pre-referral intervention programming or eligibility for special education or Section 504 protections. The school will implement a series of pre-referral intervention programs in order to provide targeted, tiered interventions to support students who are struggling in academics, behavior, or communication. Students will be referred to one of the school's Intervention Teams (AIT – Academic Intervention Team, BIT – Behavior Intervention Team, SIP – Speech Improvement Program) based on concerns of struggle from a records review, screening result, or from referral from an educator. The AIT and BIT are comprised of a multi-disciplinary team of educators, including grade level teachers, the school's Instructional Coach, special area teachers, and the school psychologist. The AIT and BIT assigns research-based interventions in identified need areas and executes systemic progress monitoring to determine response to intervention. The school's SIP targets simple articulation issues and provides weekly in-school intervention by the Speech Pathologist. SIP prevents over-identification of students under IDEA who only present with articulation concerns that are remediated with short-term articulation therapy and no longer exert an adverse impact on the student's performance in the educational environment. In all three intervention programs, student who demonstrate a lack of adequate growth, or lack of response to intervention, will be suspected of having a disability and will be referred for an initial psycho-educational evaluation by the Special Education Department.

- (a) *(Elementary Schools Only) How will the school accurately identify students prior to and following enrollment (e.g., those who require pre-school special education and related services) and in the early grades (PreK, K, 1, or 2) for appropriate services?*

When a new student enrolls in a Legacy school, the Registrar will review the enrollment materials to determine if the student has an existing IEP or 504 Plan. If either item is checked by the parent, the Registrar will immediately send the students' records to the EMO's Special Education Coordinator and the school's Special Education Records Clerk. Special Education/Section 504 records will be requested from the last known school of attendance. Upon receipt of records, the MET, IEP, and/or 504 plan will be reviewed to accurately understand the student's special needs. If the records call for supports that are not currently available at the school, the Exceptional Student Services department begins the process of procuring the supports.

- (b) *(Middle and High Schools) How will the school identify and serve students who require special education services and develop transition plans?*

As a K-8 charter network, having a student reach the age at which a full transition plan is required is rare. If a student does reach the year within which they need a transition plan (NAC 388.133), the IEP team will meet to develop a plan that will include goals for post-school outcomes and a system of coordinated transition activities to support the student in preparing for life after high school. Legacy also maintains communication with local high schools who receive its eight grade students to make certain that they understand their needs

- (c) *(All Schools) How will the school handle over-identification of students as having a disability that qualifies them for special education services? What will be the process to transition a student out of special education who has been incorrectly identified as having a disability in the past?*

Legacy employs a cross-battery assessment process to psycho-educational evaluations and uses research-based, valid, and reliable assessment tools to effectively identify students who qualify for special education. Focusing on the analysis of evaluation data, Legacy's school psychologists include robust discussion of the educational implications of the suspected disability in all METs.

Often times, the school receives records from other schools in which the needs of a student are weakly defined or unclear with regard to scope and intensity of needs. Focusing on clearly identifying the needs that result from a disability as they relate to accessing instruction helps Legacy MET teams properly identify students as eligible for special education. Legacy's pre-referral intervention programs (AIT, BIT, and SIP) also contribute to sound referral and prevent over-identification.

Legacy's MET team review the records of incoming students to determine if they contain clear documentation of a disability, well-reasoned descriptions of the educational implications of the suspected disability, and sound recommendations for specially designed instruction. If these elements are not included or well developed in a MET, the student will be immediately referred for a re-evaluation. If the elements are included in a MET, data is collected constantly with regard to progress on IEP goals. When data suggests that student is no longer in need of specially designed instruction due to a disability, the student will be referred for a re-evaluation with the intention of determining if the student can be dismissed from eligibility for special education. When a student with a disability no longer requires specially designed instruction, the student may be dismissed from special education and referred for an evaluation for possible Section 504 eligibility. If found eligible under Section 504, the student will continue to receive supports and accommodations that allow for equal opportunity and

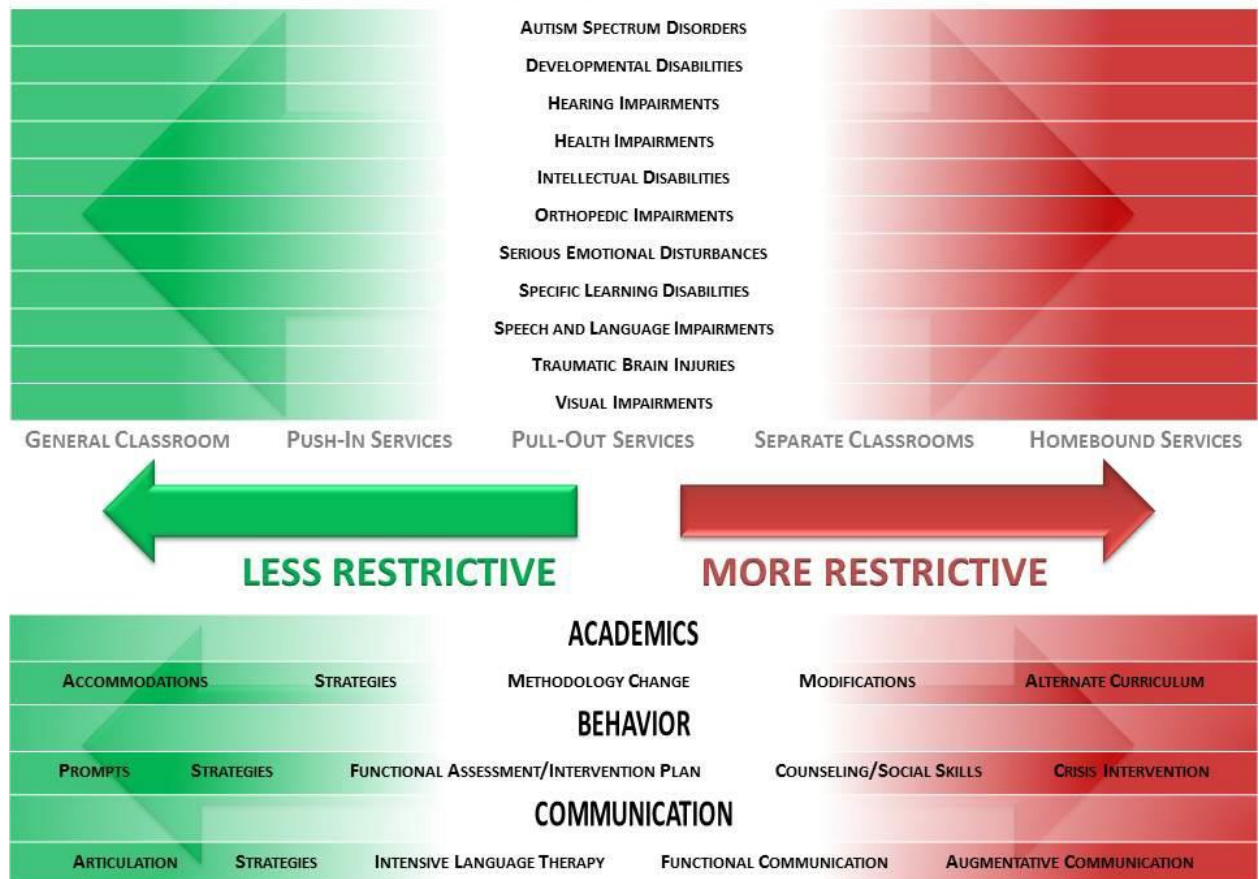
access to Legacy's programs and facilities.

- (3) *Continuum of Services: How will the school provide a broad continuum of instructional options and behavioral supports and interventions for students with a range of disabilities? Specifically describe how students with severe intellectual, learning, and/or emotional disabilities will be served. Provide a chart which graphically illustrates the continuum of services which identifies, by disability and level of severity, the means by which students with disabilities will be able to receive an appropriate public education in the least restrictive environment (note—this graphic may be created using a commercial program like Microsoft Visio or a free or low-cost internet based solution such as Lucidchart). Identify the resources, personnel (including administrative responsibilities), and direct and related services the school is likely to provide both within general education classrooms and in other settings (e.g., collaborative team teaching (CTT), Special Education Teacher Support Services (SETSS), speech therapy, physical therapy, occupational therapy, counseling, etc.) as well as the services or settings that will be provided through a consortium or other collaborative initiative with other charter schools or through a third party contract.*

Legacy will provide a continuum of services within its special education programming and will ensure that all services and supports are designed to provide strategic instruction that offers students a portable set of skills to access the general curriculum. Legacy will utilize research-based methods and materials in its provision of services. Students may receive special education services and supports within the general classroom, in 1:1 or small groups outside of the classroom, in separate classrooms, or in the homebound setting. The LRE for each student will be calculated by the IEP team. In alignment with the IDEA, Legacy Traditional School's Board understands its obligation to provide a continuum of services, and Legacy Traditional School understands that truly providing a continuum of services means that the continuum is filled with "services," not "programs." All special education programming for eligible students is designed by the special education team, including the parent, and is calculated by understanding the unique needs that result from the disability and is designed to meet the unique needs of each individual student. There is no curriculum for special education because the purpose of special education services is to provide the student access to the general curriculum. If supplementary instructional materials are needed for an individual student, the LEA Rep on the IEP team has the authority to approve funding. The LEA Rep is typically the school's principal, assistant principal, or special education coordinator.

Special education professionals, including special education teachers, speech therapists, occupational therapists, and school psychologists, deliver specially designed instruction to students that provides strategies to allow the student to access the general curriculum. Special education professionals work closely with general educators to understand the needs of eligible students and to understand the content and pace of the general curriculum. They are not replacing the general educator and providing instruction in the general curriculum. Rather, they are augmenting general instruction by providing strategies, scaffolds, background information, context, and other supports so that the student may effectively access the general curriculum.

CONTINUUM OF SERVICES



(4) *Enrollment: Describe the school's strategy and plan to recruit, enroll, and retain students with disabilities. How will the school proactively address parent and community perceptions around the availability and appropriateness of the charter school to the needs of students with disabilities?*

Legacy Traditional School has a comprehensive plan for recruitment and marketing efforts that includes multi-tiered digital media, traditional media, public open houses, and public relation efforts within targeted areas around the campus. Since Legacy Traditional School does not provide transportation, the general recruiting area is a 2-mile radius around the campus. Legacy and CFE leadership will maintain a strong presence within NDE and SPCSA events and trainings, and will identify opportunities to participate in local and national groups, including the Nevada Association of School Psychologists (NVASP). Legacy will provide a full continuum of services at each of its campuses and will ensure that specialized staff is available to provide all necessary services and related services. The school will ensure that information about its special education programming, philosophy, and staffing is messaged during public school information meetings, articulated on the website, and provided during parent tours of the school. Legacy Traditional School consistently strives for an 80% re-enrollment rate from one school year to the next. Legacy Traditional School has adopted the following SPCSA guiding principles;

- Serve all eligible students and will not deny the enrollment of any student based on needs

or disability,

- Ensure streamlined access for all students requiring special programs,
- Develop programs to support the needs of all students,
- Will not counsel or kick any students out of Legacy Traditional School,
- Utilize best practices to expose students to the most inclusive environments appropriate
- Develop a more restrictive environment to meet the leveled needs of the students, including but not limited to clustered placements in consortium with other charter schools
- Providing high functioning, trained Special Education teams, focused on student advocacy and high expectations. IEP teams (including school's leadership) make placement decisions at IEP meetings. Decisions are made based on evidence/data to support what is best for the student.

Several individuals are a part of the team that monitors enrollment and retention targets. The Campus Registrar is charged with enrollment activities at the school site and is the responsible individual for tracking enrollment numbers, available seats, and overall progress.

Legacy Traditional School provides a continuum of services within its special education programming and will ensure that all services and supports designed to provide strategic, individualized instruction are effectively communicated in our collateral.

- (5) *General Education Collaboration/Access: How will special education and related service personnel collaborate with general education teachers (e.g., team teaching, team planning, etc.) to ensure that all students are able to access a rigorous general academic curriculum?*

As a charter school with high expectations for all students, Legacy Traditional School places tremendous value on cross-team collaboration and Professional Learning Communities. Each grade level team meets weekly to collaborate, and special education personnel join the grade level meetings to share information, provide support, and ensure that the needs of students with disabilities are understood and met. Additionally, a special education representative sits on the school's Lead Teacher team. In this group, a teacher from each grade level of the school meets together. This team provides additional opportunities for collaboration between general education and special education. Operationally, Legacy Traditional School understands and values the differences in focus, preparation, experience, and expertise between general education teachers and special education teachers. Legacy Traditional School believes that general educators are the experts in the content of the curriculum and strive to ensure that all students have access to instructional content from a general educator whenever possible. Legacy Traditional School believes that special educators are the experts in learning, and that they can provide students with learning differences the strategies and scaffolding needed to access instruction. With this philosophical view leading the school's training efforts, informal collaboration between general and special educators is focused, valuable, and integral in creating the successful academic outcomes that Legacy has consistently achieved.

- (6) *Staffing: How will you ensure qualified staffing to meet the needs of students with disabilities across a broad continuum? Note: Federal and Nevada law requires licensure for the special education teachers, related service personnel, and psychologists at all charter schools, including those which are permitted to waive other licensure requirements due to their academic track record.*

In collaboration with the Human Resources Department, the Exceptional Student Services Department at CFE interviews extensively to find the right candidates for all open positions. In past years, CFE, on behalf of Legacy, has participated in job fairs in Arizona, Utah, California, Michigan, and Illinois in order to identify qualified, highly effective teachers and related service

providers for its schools. The ADE recently started a Community of Practice related to the recruitment and retention of related services providers, and CFE's Deputy Superintendent of Exceptional Student Services was asked to participate. As a member of this group, CFE will have a key role in shaping the efforts of Arizona's recruitment and retention efforts. The contacts and resources made available through participation in this group will allow Legacy to continue to build capacity within their staffing efforts in both Arizona and Nevada.

- (7) *Staff Development: How does the school plan to train general education teachers to modify the curriculum and instruction to address the unique needs of students with disabilities across a broad continuum?*

Legacy engages all educators in comprehensive training regarding instruction, classroom management, behavior support, accommodating students with special needs, and a variety of other topics that are critical to the success of all learners. Annually, CFE's Exceptional Student Services (ESS) leadership team provides all-staff training on Child Find, pre-referral intervention, special education programming, and general educators' responsibilities within special education. In addition, the special education team at the campus meets weekly with an ESS leadership team member for training and support that is targeted to the current needs of the team and campus. From there, special education personnel provide formal and informal training to the rest of the campus staff as issues or needs emerge. The majority of staff development with regard to addressing the needs of students with disabilities takes place in very small groups or in 1:1 interactions because of Legacy's belief that the needs that result from a disability are unique to each individual student and, thus, an individualized program of support is necessary for each student. Modifications to the general curriculum are never done in a "one size fits all" method. They are designed through collaboration between general and special educators and are based on the individual needs of the student with a disability to ensure as much access as possible to grade level curriculum and instruction.

- (8) *Discipline: Explain how the school will protect the rights of students with disabilities in disciplinary actions and proceedings and exhaust all options in order to promote the continuation of educational services in the home school.*

Legacy staff and administration are trained in the discipline-related rights of students with disabilities under IDEA. All staff are aware of students who have IDEA-protected rights due to collaboration with the special education team and documentation in the student management system. When a student who is eligible for special education is subjected to disciplinary action, the school ensures that, upon 10 days of disciplinary removal, the student is afforded a Manifestation Determination meeting to determine if the behavior that resulted in disciplinary action was caused by the student's identified disability. If the student's disability did cause the behavior, the student is immediately returned to the educational placement and is provided with a functional behavior assessment, intervention plan, and a comprehensive review of the IEP's goals and services. If the student's disability did not cause the behavior, the IEP team will meet to review the student's IEP goals, services, and educational placement. The student may be determined to require a more restrictive environment along the school's continuum of services at that time. As a charter school that must educate all students under one roof, all efforts are made to individualize the level of support and direct service that a student needs to ensure as much access as possible to the general education classroom. While students have been placed in a homebound setting on occasion due to complicated medical needs or behaviors that resulted in a danger to others, these placements have been rare.

(9) Monitoring: What are your plans for monitoring and evaluating both the progress and success of students who qualify for special education and related services across a broad continuum, and the extent to which your special education program complies with relevant federal and state laws? How will curriculum and instructional decisions be tracked and monitored by IEP teams and school personnel?

Legacy's special education personnel are required to keep detailed records on the progress of all special education students. Special education teachers chart summary progress on IEP goals on an at least weekly basis. Related service providers track data on each session of service. Regional Special Education Coordinators, who are part of the EMO's Exceptional Student Services leadership team, collect data related to workload size, student needs, initial referrals to special education, re-evaluations, dismissals, and pre-referral intervention programming and outcomes on an ongoing basis and report the data to the Deputy Superintendent and Principals monthly. The Exceptional Student Services leadership team engages in internal audits of randomly selected special education files on a regular basis and uses the results of the audit to guide professional development. Additionally, when special education staff turn in paperwork, they attach a detailed coversheet that outlines compliance factors that are specific to each type of record. The Regional Coordinator reviews the file for procedural compliance and then either signs the coversheet and turns it in or returns it to the staff member for corrections, addendums, or other revisions.

(10) Parental Involvement: What appropriate programs, activities, and procedures will be implemented for the participation of parents of students with a broad range of disabilities?

Parents are a vital member of the special education team and they have an integral role in decision-making. All parents are invited well in advance to all special education meetings for their child. Accommodations are made to revise proposed meeting dates to align with parent's availability. Meetings are offered in multiple modes (in person, via phone conference, via video conference, etc.), and have been offered in various locations as needed to prompt full meaningful-participation by parents.

All special education meetings are documented through a note in a meeting summary. This document is reviewed and signed by all participants at the conclusion of the meeting to ensure that everyone agrees regarding the issues that have been discussed and the school's proposals moving forward. Parents receive Intent to Implement following a meeting and prior to implementation of changes to make certain that they have an opportunity to exercise their right to disagree with the school's proposal. Legacy Traditional School conference rooms are outfitted with audiovisual equipment such as televisions or LCD projectors, and the technology is used in meetings to provide visual resources during the meeting. The team may display a copy of a draft and make changes while the team discusses, for example. The School Psychologist may display quantitative data points collected from an assessment and then show the data points in a graph format to show the student's performance in comparison to a typical peer. The purpose of utilizing the technology is to increase parent understanding of the content of the meetings and to prompt interaction and collective decision-making.

All special education meetings are facilitated by a designated team member, and they follow a prescribed format to ensure familiarity and to promote participation. The meetings are started with introductions of all team members and a description of the role they represent on the team (beyond their job title). The written agenda for the meeting is then introduced, and the facilitator explains the flow of the meeting. These procedures have increased parent involvement and

comfort in the special education process at Legacy schools.

- (11) *For Distance Education Schools: Describe how the school will provide appropriate services in the distance education learning environment to students with disabilities across a broad continuum. If you are not proposing to operate a distance education or virtual school, please explain that this is not applicable.*

Legacy Traditional School – Southwest will not offer a Program of Distance Education. Therefore, this question is not applicable for this application.

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REFERENCES

Committee to Form's Response to the State Public Charter School Authority's 2015 Call for Quality Charter Schools Request for Proposals (2015) Charter School Proposal for Legacy Traditional School – Henderson

Operations Plan

(12) Organization Governance Structure & Board Development:

- (a) *Describe how the organization's governance structure will adapt to oversee and support the 6-year growth plan and addition of new school(s). Include any impact on: (1) the composition of the Board, the Board's roles and responsibilities, and the Board's development priorities and (2) the Board's relationship to individual campuses.*

The LTS-Nevada board formed in February 2016 and has been committed to growth and development since inception. LTS- Nevada has had one Board member who has transitioned out for professional reasons; however, every current board member has a deep commitment to LTS-Nevada.

With the addition of a new campus, the LTS-Nevada board will focus their efforts on providing support and maintaining structure to safeguard quality and consistency across the network. The Board will utilize innovative tools to monitor the operational, financial and academic performance of each campus along with an annual training to prepare the Board for handling this increased capacity to guarantee consistency. The capacity of the Board to accommodate growth has been considered by Board members. A fluid secession plan has been created to ensure the board will maintain its capacity to accommodate the growth. Also, if necessary, additional Board members will be recruited and appointed as needed to adapt to the six year growth plan.

Each Legacy School is governed by a five-member board of directors (the "Board"), elected by a majority vote of the members of the Board. Members are elected to serve staggered, three-year terms. The Board is the governing body and the ultimate authority at the school, responsible for all school operations. The Board contracts with CFE to handle much of the day-to-day administrative and academic operations at the school. The Board is responsible for adopting and directing school and board policies and procedures, assuring that policies and procedures are implemented, and keeping the School in compliance with the Charter School Contract, applicable State and federal laws, and the school's accounting requirements. The management contract between the Board and CFE is signed at the option of the Board, and the Board has the ability to not renew the contract at the end of the term or to pursue terminating the contract if the services performed are not satisfactory.

- (b) *Describe the diverse skillsets that currently exist on the Board and note any additional type of expertise that the Board may seek to help support the growth plan.*

The Board consists of a highly qualified group of volunteers including an innovative marketing strategist, two educators both experienced Special Education teachers; one with a secondary career as an Assemblywomen with the Nevada State Legislature, a parent representative who owns her a Property Management company and an attorney. LTS-Nevada will continue to reach out to community resources to ensure a large consortium of candidates in the case of succession.

- (c) *Identify any Board development requirements relative to the organization's governance needs at each stage of growth.*

At each stage of growth, the LTS-Nevada board will receive annual training and professional development related to organization's growth. . The Board Members will receive training in the following areas: Board Training, Charter Application and Amendments, SPCSA Charter Contract, Statement of Assurances, Organization of the Board, Bylaws, Open Meeting Law, Code of Conduct, Regular Board Meetings, Code of Ethics, Conflict of Interest Policy, Whistle Blowing, Board Goals, Lines of Communication, Decision Making, The Role of the EMO, Nevada Revised Statutes, Nevada Administrative Code, Every Student Succeeds Act, FERPA and Public Records Law, Records Retention and Disposal Policies and Procedures, Title II of the Americans with Disabilities Act, Title IX of the Educational Amendments of 1972, Title IV of the Civil Rights Act of 1964, Individuals with Disabilities Education Improvement Act (IDEA), Section 504 of the Rehabilitation Act, Nevada Government Purchasing Laws (NRS 332.039-148) and Acronyms for School Board Members.

- (d) *Describe how the Board identifies and addresses conflicts of interest. Attach a code of ethics that includes a formal conflict of interest policy and specifies the procedures for implementing the policy.*

Procedures

1. Duty to Disclose. In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors and members of committees with Governing Board delegated powers considering the proposed transaction or arrangement.
2. Determining Whether a Conflict of Interest Exists. After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the Governing Board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining Board or committee members shall decide if a conflict of interest exists.
3. Procedures for Addressing the Conflict of Interest.
 - a. An interested person may make a presentation at the Governing Board or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
 - b. The chairperson of the Governing Board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
 - c. After exercising due diligence, the Governing Board or committee shall determine whether the Corporation can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
 - d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Governing Board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Corporation's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with

the above determination it shall make its decision as to whether to enter into the transaction or arrangement.

4. Violations of the Conflicts of Interest Policy.

- a. If the Governing Board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Governing Board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Records of Proceedings

The minutes of the Governing Board and all committees with Board delegated powers shall contain:

- a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Governing Board's or committee's decision as to whether a conflict of interest in fact existed.
- b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Compensation

- a. A voting member of the Governing Board who receives compensation, directly or indirectly, from the Corporation for services is precluded from voting on matters pertaining to that member's compensation.
- b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Corporation for services is precluded from voting on matters pertaining to that member's compensation.
- c. No voting member of the Governing Board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Corporation, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

Annual Statements

Each director, principal officer and member of a committee with Governing Board delegated powers shall annually sign a statement which affirms such person:

- a. Has received a copy of the conflicts of interest policy,
- b. Has read and understands the policy,
- c. Has agreed to comply with the policy, and
- d. Understands the Corporation is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Periodic Reviews

To ensure the Corporation operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- a. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.
- b. Whether partnerships, joint ventures, and arrangements with management organizations conform to the Corporation's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

Use of Outside Experts

When conducting the periodic reviews as provided for in Article VII, the Corporation may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the Governing Board of its responsibility for ensuring periodic reviews are conducted.

A complete copy of the LTS - Nevada Inc. Conflict of interest Policies and Procedures is located in the LTS-Nevada Policies and Procedures, section 109 of Governance Series 100.

(13) *Organization Charts and Decision-Making Authority:*

(a) *Provide the following organizational charts:*

- *Current*
- *Vision for school in three years (clearly identify both campuses requested in this amendment request as well as any additional campuses that the operator anticipates applying to open within three years)*
- *Vision for school in six years (clearly identify both campuses requested in this amendment request as well as any additional campuses that the operator anticipates applying to open within six years)*

The organization charts should represent the all national and state operations and clearly delineate the roles and responsibilities of – and lines of authority and reporting among – the governing board, staff, any related bodies (e.g., advisory bodies or parent/teacher councils), and any external organizations that will play a role in managing the schools. If the school intends to contract with an education management organization or other management provider, clearly show the provider's role in the organizational structure of the school, explaining how the relationship between the governing board and school administration will be managed. Please include all shared/central office positions and positions provided by the Management Organization (CMO or EMO) in the organizational chart, if applicable.

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Network Current, Three and Six Year Vision
CFE Management Group

Legacy Traditional Schools - Arizona

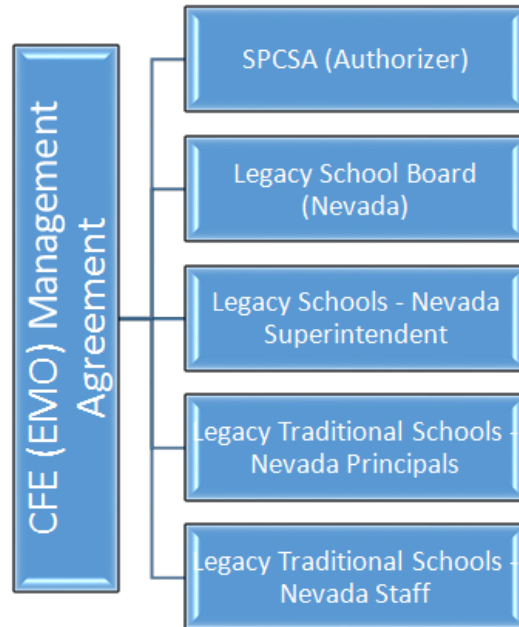
Maricopa – 2007
Casa Grande – 2009
Queen Creek – 2010
Chandler – 2011
Tucson – 2011
Avondale – 2011
Laveen – 2012
Gilbert – 2013
Surprise – 2015
Peoria – 2016
Glendale – 2016
North Chandler – 2016
Phoenix – 2019
Mesa – 2019

Legacy Traditional Schools – Nevada

North Valley – 2018
Cadence – 2019
Southwest Valley - 2020

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Illustration of EMO relationship with Legacy – Nevada



CFE Management Group's (CFE) core values include innovative mind, hungry heart, and engaging spirit. CFE manages and expands schools by providing academic, business and development services. As the premier service provider in educational management, CFE's core purpose is to change lives through education. CFE has realized success based on its three strategic anchors:

1. Deliver exception service
2. Grow smart
3. Value people

Outlined in the management agreement, under the supervision and direction of the Board, in cooperation with the Legacy – Nevada Superintendent, CFE executes the charter contract issued by the authorizer and confirms compliance.

All school campus employees report to school supervisors and, ultimately, to the Principal of the campus. The Principal reports to the entity Superintendent. The Superintendent reports directly to CFE Management Group. CFE supports the Superintendent and Principals at all Legacy schools. Regular communication and frequent campus visits are expressed requirements provided by CFE.

CFE provides support to all campus employees. The Board regularly reviews the school's academic performance and financial audits. These reports are made available on a quarterly, annual, and as-needed basis, depending on the nature of the report. CFE is accountable for its performance in supporting the school.

Legacy Traditional Schools' Supervising Organization Chart

Authorizer -

Legacy Board -

CFE Management Group -

Legacy Superintendent -

Legacy Principal -

Legacy School Staff

CFE Organization Chart

Owners -

CEO -

Executive Management Team -

CFE Directors -

CFE Staff

CFE - Academic Division Supervising Organization Chart

Chief Academic Officer -

Superintendent -

Director -

Deputy Superintendents -

Assistant Directors -

Subject Matter Experts

(14) Describe the proposed organizational model; include the following information:

(a) Job descriptions for each leadership or shared/central office role identified in the organizational chart (provide as Attachment 12)

See Attachment 12

(b) Resumes of all current leadership (provide as Attachment 13).

See Attachment 13

(c) Previous student achievement data for the proposed instructional leaders at each proposed campus (if available) (provide as part of Attachment 13)

See Attachment 13

(15) Describe the leadership team's individual and collective qualifications for implementing the multi-site school design and business and operating plan successfully, including capacity in areas such as:

(a) School leadership;

(b) School business operations and finance;

(c) Governance management and support to the Board;

(d) Curriculum, instruction, and assessment;

(e) At-risk students and students with special needs;

(f) Performance management; and

(g) Parent and community engagement.

Legacy is currently interviewing qualified applicants for the entity Superintendent position. Once the Board has appointed a Superintendent for Legacy – Nevada, their information will be sent to the Authorizer. CFE’s Leadership Team is exceedingly qualified to implement a multi-site school design. CFE has an extremely successful track record of operating charter schools and producing strong academic outcomes in an efficient operational manner. CFE created all of the curriculum, policies and procedures that Legacy uses today for the strong educational outcomes and smooth operations of its nine schools in Arizona. Today, the 12 school system they manage, Legacy Traditional School, is rated the top K-8 school district in Arizona. Legacy is the largest K-8 charter network in Arizona. Legacy was recently voted the #1 charter school in the state. These successes are due, in large part, to CFE’s strong support in every facet of the education business. The board recognizes it cannot duplicate results like this on its own. The board selected CFE as the CMO for Legacy in 2015, shortly after board formation. They did so because 1. CFE has demonstrated its ability to support Legacy schools in Arizona for the past ten years in achieving outstanding academic results at every campus, and 2. CFE is extremely efficient in its operational support and the associated fee it charges. CFE’s full-scale provision of academic, finance, accounting, communications, facilities, and food services allows Legacy to focus on what it does best: deliver top-quality curriculum to students. CFE created all of Legacy’s vision/mission, curriculum, policies, and structure that initially got Legacy off the ground in 2006. The board has thoroughly vetted and interviewed CFE to ensure CFE’s support meets the board’s expectations of management for Legacy schools. The board will have the regular opportunity to choose other CMO’s (or manage the schools itself) each time a management contract expires between CFE and a Legacy school. The Legacy board intends to carefully reevaluate CFE’s offerings and pricing each time.

(16) Explain who is responsible for school leader coaching and training and what those processes will look like in action. Please include any existing competencies used for school leader selection and evaluation, if available (provide as Attachment 14).

The Authorizer, the EMO and Nevada’s Superintendent are responsible for school leader coaching and training. The specific process is outlined in the original Committee to Form’s Response to the State Public Charter School Authority’s 2015 Call for Quality Charter Schools Request for Proposals.

(17) Explain your school leader’s role in the successful recruitment, hiring, development and retention of a highly effective staff.

The school leader’s role in successful recruiting, hiring, development and retention of a highly effective staff will be specifically jointly created by the Superintendent and the school leaders. The concluding contract will be included on the position’s job description and adopted by the Board for accountability purposes. CFE plays a significant role in the development process. Specifically, their obligations are outlined in the original Committee to Form’s Response to the State Public Charter School Authority’s 2015 Call for Quality Charter Schools Request for Proposals and the adopted management agreement.

(18) Explain your campus instructional leader’s role in providing instructional guidance and school culture guidance. How will the leadership team work in support of the campus instructional leader’s guidance?

The campus instructional leaders will provide instructional guidance and school culture guidance by creating and implementing a comprehensive plan of action. CFE and the

Superintendent will create a support plan in an effort to meet the goals outlined in the local plan of action.

(19) What systems are in place in your leadership team structure to ensure redundancies in knowledge and skill?

The organization has codified policies, procedures personnel evaluations, validation evaluations, third-party independent auditors and more to ensure successful replications of a successful mode.

[Remainder of page intentionally left blank.]

REFERENCES

Committee to Form's Response to the State Public Charter School Authority's 2015 Call for Quality Charter Schools Request for Proposals (2015) Charter School Proposal for Legacy Traditional School – Henderson.

Leadership Expansion

- (1) *Describe the operator's current or planned process for recruiting and training potential network leaders. Explain how you have developed or plan to establish a pipeline of potential leaders for the network as a whole. If known, identify candidates already in the pipeline for future positions.*

Currently, the Legacy system has 17 trained, experienced and highly effective Assistant Principals and 12 Instructional Coaches that will be considered for Legacy Schools' Principal vacancies. Over 100 of 409 teachers in the Legacy system have completed or in the process of completing their graduate degree in Educational Leadership and will be considered for future leadership positions.

- (2) *Identify the proposed regional director candidate, if applicable, and explain why this individual is qualified to lead the expansion of the organization (provide a resume as Attachment 15). Summarize the proposed leader's academic and organizational leadership record. Provide specific evidence that demonstrates capacity to design, launch, and manage a high-performing charter school network.*

- (a) *If a regional director candidate has not yet been identified, provide the job description (as Attachment 15) or qualifications and discuss the timeline, criteria, and recruiting and selection process for hiring the regional director. Note: It is strongly encouraged that schools proposing to open new campuses in the 2017-18 school year identify the regional leader (Regional Director, Executive Director, etc.) in the proposal. The SPCSA reserves the right to require schools which do not have network leadership and support position candidates identified to defer opening new campuses until the 2017-18 school year and to add additional criteria to the pre-opening requirements for such campuses.*

Legacy Traditional School – Southwest has not identified a Superintendent. Therefore, this question is not applicable for this application. A job description is available in Attachment 15

Staffing

(1) Complete the following table indicating projected staffing needs for the proposed campuses over the next six years. Schools should also complete the second table outlining projected staffing needs for the entire network over the next six years. Include full-time staff and contract support that serve the network 50% or more. Change or add functions and titles and add or delete rows as needed to reflect organizational plans.

Proposed New Campus(es)

Year	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Management Organization Positions						
Superintendent	1	1	1	1	1	1
Total Back-Office FTEs	0	0	0	0	0	0
School Staff						
Principals	1	2	3	4	5	5
Assistant Principals	2	4	6	8	10	10
Add'l School Leadership Position 1 Instructional Coach	1	2	3	4	5	5
Add'l School Leadership Position 2 [Specify]	0	0	0	0	0	0
Add'l School Leadership Position 3 [Specify]	0	0	0	0	0	0
Classroom Teachers (Core Subjects) K-6	35	70	105	140	175	175
Classroom Teachers (Specials)	14	28	42	56	70	70
Junior High Teachers	10	20	30	40	50	50
Gifted Teacher	1	2	3	4	5	5
Campus Registrar	1	2	3	4	5	5
School Secretary	2	4	6	8	10	10
Health Assistant	1	2	3	4	5	5
Library Assistant	1	2	3	4	5	5
Food Service Manager	1	2	3	4	5	5
Food Service Cashier II	1	2	3	4	5	5
Food Service Cahier I	1	2	3	4	5	5
Food Service Worker	1	2	3	4	5	5
Facilities Manager	1	2	3	4	5	5

Groundskeeper	1	2	3	4	5	5
Custodian	3	6	9	12	15	15
Related Services						
SPED Teachers	4	8	12	16	20	20
SLP or SLT	2	3	4.5	6	7.5	7.5
SLPA	0	0	0	0	0	0
Psychologist	1	2	3	4	5	5
OT	Contracted Services					
COTA	Contracted Services					
Perm Sub	2	4	6		8	10
SPED Para	4	8	12		16	20
SPED one on one	1	2	3		4	5
Para	2	4	6		8	10
Aide	4	8	12		16	20
Total FTEs at School	97.5	195	292.5	390	487.5	487.5

Network estimate based on full capacity of 1,450 per school

Year	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Number of K-8 Schools	13	16	17	18	19	19
Number of High Schools	0	0	0	0	0	0
Total Schools	13	16	17	18	19	19
Student enrollment	14,600	18,270	20,450	22,300	23,900	23,950
Management Organization Positions						
Superintendent	1	1	1	1	1	1
Total Back-Office FTEs	1	1	1	1	1	1
Elementary School Staff						
Principals	13	16	17	18	18	20
Assistant Principals	25	30	33	36	38	38
Instructional Coach	14	17	18	19	20	20
Add'l School Leadership Position 2 [Specify]	0	0	0	0	0	0
Add'l School Leadership Position 3 [Specify]	0	0	0	0	0	0
Classroom Teachers (Core) K-6	425	521	562	600	637	637

Classroom Teacher (Specials and Electives)	111.5	140.5	154.5	168.5	182.5	182.5
Junior High Teachers	68	86	101	113	123	123
Gifted Teacher	11	14	15	16	17	27
Campus Registrar	13	16	17	18	18	20
School Secretary	26	32	34	37	39	39
Health Assistant	13	16	17	18	19	19
Library Assistant	12	15	16	18	19	19
Food Service Manager	13	16	17	18	19	19
Food Service Cashier II	11	13	14	16	17	17
Food Service Cashier I	13	16	17	18	19	19
Food Service Worker	15	18	19	21	22	22
Facilities Manager	13	16	17	18	19	19
Groundskeeper	13	16	17	18	19	19
Custodian	48	58	61	65	68	68
Related Services						
SPED Teachers	37	45	49	53	57	57
SLP or SLT	13	16	17.5	19	20.5	20.5
SLPA	1	2	2	2	2	2
Psychologist	13	16	17	18	19	19
OT	Contracted Services					
COTA	Contracted Services					
Perm Sub	27	33	35	37	39	39
SPED Para	48	58	62	66	70	70
SPED one on one	15	18	19	20	21	21
Para	26	32	34	36	38	38
Aide	50	60	64	68	72	72

Total FTEs at Middle Schools	1087.5	1336.5	1446	1554.5	1654	1654
High School Staff						
Principals	N/A	N/A	N/A	N/A	N/A	N/A
Assistant Principals	N/A	N/A	N/A	N/A	N/A	N/A
Deans	N/A	N/A	N/A	N/A	N/A	N/A
Add'l School Leadership Position 1 [Specify]	N/A	N/A	N/A	N/A	N/A	N/A
Add'l School Leadership Position 2 [Specify]	N/A	N/A	N/A	N/A	N/A	N/A
Add'l School Leadership Position 3 [Specify]	N/A	N/A	N/A	N/A	N/A	N/A
Classroom Teachers (Core Subjects)	N/A	N/A	N/A	N/A	N/A	N/A
Classroom Teachers (Specials)	N/A	N/A	N/A	N/A	N/A	N/A
Special Education Teachers	N/A	N/A	N/A	N/A	N/A	N/A
ELL/TESOL Teachers	N/A	N/A	N/A	N/A	N/A	N/A
Student Support Position 1 [e.g., Social Worker]	N/A	N/A	N/A	N/A	N/A	N/A
Student Support Position 2 [specify]	N/A	N/A	N/A	N/A	N/A	N/A
Specialized School Staff 1 [specify]	N/A	N/A	N/A	N/A	N/A	N/A
Specialized School Staff 2 [specify]	N/A	N/A	N/A	N/A	N/A	N/A
Teacher Aides and Assistants	N/A	N/A	N/A	N/A	N/A	N/A
School Operations Support Staff	N/A	N/A	N/A	N/A	N/A	N/A
Total FTEs at High Schools	N/A	N/A	N/A	N/A	N/A	N/A
Total Network FTEs	N/A	N/A	N/A	N/A	N/A	N/A

Human Capital Strategy

Describe your strategy, plans, and timeline for recruiting and hiring teachers for a multi-site charter school. Explain key selection criteria and any special considerations relevant to your school design. Note: schools with strong track records of academic success, as determined by the Department of Education, are eligible to waive teacher licensure requirements for all teachers except for special education and ELL professionals as long as they meet all other federal and state requirements. Maintaining such a waiver is contingent on the school continuing to achieve at the 3 Star level or higher (or equivalent) on the statewide system of accountability. Please refer to Section 46 of SB509 (2015 session) for additional information.

(1) Recruitment: Identify whether recruitment will be managed at the campus or network level. Identify key partnerships and/or sources the operator will rely upon of teachers and leaders. Identify the process the operator will rely upon to identify and develop high-quality leaders and high-quality teachers.

Recruitment is a service of the EMO. Based on the recruitment budget, the EMO's HR and Marketing Staff will create relevant ads and job postings. Job postings will be published on the State Education Department's job board, local college job boards, community job boards, national recruiting sites, Legacy's website, Facebook, local newspapers, and through Google ads. The HR Staff will attend job fairs to recruit candidates locally and nationally. The HR Staff will work with business partners such as Ziprecruiter & Applitrack to ease the process for the applicant. As part of the hiring process, the HR Staff will conduct screening questionnaires to determine basic competencies, conduct initial phone screenings to recommend candidates, provide the tools for scheduling and tracking interviews for the Principal and/or Superintendent. The Principal and Superintendent will be provided with suggested interview questions to help determine if the candidate will be successful in the Legacy program.

(2) Leadership Pipeline: Discuss the specific measures and timelines the organization will employ to identify and develop organizational and school leaders. For example, explain:

- *How the school plans to identify leadership internally and externally;*
Beginning in early fall prior to opening the following summer, initial leadership identification will begin with recruiting current highly-effective, qualified Legacy staff in Arizona who are willing to relocate. Highly effective status is based off the previous years' performance evaluation. If currently trained Legacy staff are not available, the EMO will work to recruit high performing local leaders who believe in Legacy's model and mission.
- *Who will be responsible for hiring leaders;*
The recruitment of the Superintendent will be handled by the EMO. The Chief Academic Officer will conduct initial interviews and coordinate the final panel interview with representatives from the EMO's Academic and/or Executive team. The final recommended candidate will be presented to the Nevada School Board for approval prior to hiring. The Principal candidates will complete interviews with the Nevada Superintendent. Preference will be given to internal Legacy candidates prior to opening interviews to external candidates. The final recommended candidate will be presented to the Nevada School Board for approval prior to hiring. All additional campus leaders will be hired by the Principal. The goal would be to fill both of these key roles by December of the year prior to opening.
- *Formal and informal systems that will prepare leaders for their responsibilities;*
Once appointed to a leadership position, the school administrator will spend a week in

Arizona training directly with a Superintendent and observing multiple existing Legacy schools. The Legacy Leadership Program will then include multiple days of training covering: policy and procedure review, job descriptions and responsibilities, effective communication, instructional leadership development and team building opportunities. These pre-service trainings provide the new leader with many of the tools they will need to successfully embark on their new position.

- *The school's philosophy regarding internal promotions;*
Legacy will actively seek individuals within the organization that consistently demonstrate strong leadership skills and have the potential to complement the organization's mission and vision. Legacy is a rapidly growing institution and understands the importance of employing highly effective leaders and continuing to develop and support each Administrator on their school leadership path. The first step in the secession plan is to inquire within our existing staff those individuals that are already in a leadership program or might be considering administrative positions in the future. We reach out to our current administrators for recommendations of future leaders and conduct formal and informal observations, when applicable. Legacy believes there is a great benefit in promoting within the organization to allow for the greatest opportunity for success of a campus due to the lengthy exposure and training of a current staff member.
- *The timing for identifying leaders in relation to the launch of a new campus; and,*
The selection of the Superintendent and Principal will take place in November prior to the school opening. The intention is to have the school leader begin training at least 2 weeks prior to the opening of enrollment.
- *Internal or external leadership training programs.*
The Superintendent will regularly meet with those staff members that are already in a leadership program to mentor and discuss further positions within the district. Once potential leaders are identified, they are given many opportunities to demonstrate their abilities by participating in the following activities:
 - Chairing an academic committee
 - Overseeing school-wide events
 - Becoming a team lead
 - Participating on an interview committee
 - Mentoring a struggling peer
 - Completing assigned administrative tasks

(3) *Professional Development: Identify the school's plan to meet professional development needs. Include whether professional development will be managed at the school or network level and how new campuses will be added to existing professional development. Also identify the method the school will use to determine the effectiveness of professional development.*

Teachers at Legacy Traditional School – Southwest will participate in intensive and engaging pre- service trainings at the beginning of each school year. These multi-tiered workshops explain the expectation of the position, review the requirement of school operations and provide a variety of professional development opportunities to fit the needs of the employee. The local Principal will lead the trainings with materials and support provided by the EMO. A menu of required and optional professional development topics are provided by the EMO to the campus administrator.

Each new teacher will participate in a two week Spalding training that will teach the specific

techniques of the approved language arts program. These techniques will continue to be observed by the administrators throughout the year to ensure fidelity of the program of instruction.

Additionally, the administrators at each campus will conduct a two-day training that is specialized to fit the needs of a new employee. Special attention will be given to those areas that have proven to be a struggle for all new employees with strategies to mitigate first year challenges.

(4) Performance Evaluations and Retention: Identify the school's approach to staff performance evaluations. Identify how frequently the organization plans to: evaluate teachers, campus administrators, and network leaders and staff, who will evaluate whom, and how the organization plans to retain high-performing teachers and administrators?

The Legacy Traditional School Teacher Performance Evaluation program will help to support teachers in their professional path to becoming highly effective educators. All components of the evaluation system recognize those areas of excellence, as well as, established areas of growth required. Teachers will be evaluated using the following criteria: highly effective, effective, developing or ineffective. As a result of the evaluation, the teacher will be provided with a detailed document stating status of goals, results of classroom assessment data, classroom observation ratings and an evaluation of professional performance as a school employee. This document will evaluate teachers using the following categories:

- Professional and Personal Goals
- Instructional Performance and Development
- Performance Related Factors
- Student Academic Performance

20/20 observations of the teachers are conducted a minimum of 20 times throughout the year for 20 minutes per observation. Observation feedback is provided to the teacher in writing within 2 business days of the observation. Two formal observations are completed per year for every teacher, one in the fall and one in the spring. The results are reviewed individually with each teacher by the Principal. Improvement action plans are developed based on these evaluations. Performance bonuses are provided annually based on a teacher's status on their formal evaluations.

Administrators and Support staff are evaluated at the conclusion of their 90-day probation period and annually thereafter on a formal, written performance evaluation.

The EMO conducts monthly and quarterly audits of the varied departments within the campus and provides the audit results to the Principal for continuous improvement.

(5) Compensation: Explain the board's compensation strategy and salary ranges for network and school level staff. Discuss how the compensation structure enables the organization to attract and retain high quality staff and describe any incentive structures such as bonuses or merit pay. Compare the proposed salary ranges to those in other organizations, charter schools and local districts, as applicable.

Salaries range from \$35,000 - \$50,000 for starting Teachers. This range is equal to or better than the surrounding districts. Legacy Traditional School will offer additional stipends for: Lead Teacher, Coach, Teaching with no prep, & Before and After School Instructors. Legacy offers a complete benefits package that includes: medical, dental, short-term disability, long-

term disability, life insurance, and teacher retirement through the Public Employee Retirement System. Additionally, all Teachers are eligible for significant performance pay that is paid as a bonus each December and June which directly correlates to their effectiveness in the classroom. Lastly, Legacy offers a unique incentive in providing tuition reimbursement for a master's program covering ½ of the total tuition cost for the teacher.

[Remainder of page intentionally left blank.]

Scale Strategy

(1) Describe the steps that you will take to scale your model to new sites, including the people involved and the resources contributed both by the founding campus and the new campuses.

The Board, Legacy Traditional School - Southwest staff and the staff of CFE Management Group will make every effort to scale the Legacy model to the new site. CFE employs Executives, Directors, Managers and Staff that have proven experience in opening new Legacy schools in various communities. Standardizing Legacy schools requires a two-step process, a Startup sequence and a Validation process. Based on years of experience opening new schools, a Legacy Traditional School Startup Task list was created to solidify the school achieves a successful opening. All of the resources that accompany these processes are provided by CFE.

(2) If the school is affiliated with a CMO or EMO that operates schools in other states, compare your efforts to scale operations to Nevada to past scale efforts in other states.

CFE has overseen the successful opening of 12 campuses in Arizona, and one in Nevada. In doing so, they have established set staffing guidelines and job responsibilities tied to enrollment numbers. As enrollment increases, additional positions are opened and responsibilities reassigned accordingly. CFE is adequately poised for scalable growth and operations.

(3) Describe your plan for embedding the fundamental features of the model that you described in the transformational change section in each new campus that you plan to open.

Legacy Traditional School – Southwest will utilize an accelerated, "traditional education" program of instruction to achieve academic excellence among all students. This is embedded through multiple strategies. First, Madeline Hunter's Seven Steps of Direct Instruction is the evidence-based teaching strategy utilized in Legacy classrooms.⁹ The Nevada Academic Content Standards' (NVACS) aligned curriculum is deliberately delivered to students directly by the highly-qualified, Spalding language arts certified, State certified, teacher of record. Through Spalding I & II certification training, Saxon math instruction training, various professional development requirements and school administrator instructional leadership/supervision, teachers learn strategies and techniques that equip them with the ability to identify opportunities to drive growth among all learners.

Additionally, a positive, civilized and cultured educational environment is an essential tenet of Legacy's traditional education. All stakeholders create this environment through the execution of a proven curriculum, established practices/processes and adherence to expressed and implied expectations. Administrators, teachers and staff are professionally trained to utilize a "positive discipline" approach toward policy compliance. This evidence-based system of positive reinforcement has been proven to be an effective teaching opportunity for children to learn reward and consequence. According to Psychologist Jane Nelsen, "The key to positive discipline is not punishment, but mutual respect" (Nelsen, 2006).¹⁰ The positive discipline system reduces student infractions and is a positive culture and climate manager in current Legacy schools.

⁹ Hunter, Madeline. *Mastery Teaching*. Las Angeles: Hunter Enterprises Inc., 1982.

¹⁰ Nelsen, Jane. *Positive Discipline*. New York: Ballantine Books, 1996

Through the “Standards of Citizenship” curriculum and daily routines including the morning whole group recitation of the pledge of allegiance, individual patriotic poem recitations, themed book reports and concerts/performance, the school connects students with our nation's heritage and instills within them the traditional values of patriotism, honor and the sacred duties that come with citizenship.

(4) Explain any shared or centralized support services the management organization will provide to campuses in Nevada.

Legacy Traditional School - Southwest will operate under a centralized school management system. The centralized support services provided by CFE includes: Academic Development, Exceptional Student Services oversight, Section 504 of the Rehabilitation Act of 1973 and Subsequent Amendments training, Health Services oversight, Representation, Compliance Reporting oversight, Community Education oversight, Complaint Resolution assistance, School Branding and Marketing, Enrollment oversight, Grant Coordination, Financial Services, Human Resources, Information Systems support, Facilities Management oversight, Food Services oversight, Board Meeting support, and Government Accountability

(5) Describe the structure, specific services to be provided, the cost of those services, how costs will be allocated among campuses, and specific service goals of the network. Please also include how the school will measure successful delivery of these services. In the case of a charter management organization proposing to contract with an education management organization, service goals should be outlined in the term sheet and draft contract provided later in Attachment 19. Note that Nevada law allows charter schools to contract for the management or operation of the school with either a for-profit or non-profit education management organization.

The structure of the services provided to Legacy Traditional School - Southwest are outlined in the management agreement between the Board and CFE. Included in the management agreement are contractual costs, service goals, and how the board will measure the successful delivery of these services. The management contract between the Board and CFE is signed at the option of the Board, and the Board has the ability to not renew the contract at the end of the term or to pursue terminating the contract if the services performed are not satisfactory.

(6) Using the table below, summarize the division school- and organization-level decision-making responsibilities as they relate to key functions, including curriculum, professional development, culture, staffing, etc. This division of responsibilities will be evaluated both in the context of Nevada law and regulation and best organizational and authorizing practices nationally. Do we need to combo the 2 & 3 column

Function	Mgmt Org Decision-Making	Network Leader Decision-Making	Board Decision-Making	Campus Leader Decision-Making
Performance Goals	The Network Management Organization will make the final decision for this category in	The Network Management Organization will make the final decision for this category in collaboration with the Principal.	The local Board will have final decision making authority but will delegate this responsibility to the Network Management	The School Leader will collaborate with the Network Management Organization to

Curriculum	collaboration	Organization	and	make decisions
Professional Development	with the Principal	School Leader		
Data Mgmt & Interim Assessments Promotion Criteria				
Culture				
Budgeting, Finance, and Accounting Student Recruitment				
School Staff Recruitment & Hiring HR Services (payroll, benefits, etc.) Development/ Fundraising				
Community Relations				
IT				
Facilities Mgmt				
Vendor Management / Procurement Student Support Services Other operational services, if applicable				

Student Recruitment and Enrollment

Like all public schools, public charter schools must be open to any such child, regardless of that child's race, gender, citizenship, or need for accommodations or special education services. Thus, recruitment and enrollment practices should demonstrate a commitment to providing all students equal opportunity to attend the school, and help schools avoid even the appearance of creating barriers to entry for eligible students.

- (1) *Explain the plan for student recruitment and marketing for the new campuses that will provide equal access to interested students and families, including how the school will comply with the requirements of SB208 (2015 session). Specifically, describe the plan for outreach to: families in poverty; academically low-achieving students; students with disabilities; and other youth at risk of academic failure. For schools which are giving one or more statutorily permissible admissions preferences pursuant to NRS 386.580 or SB390 (2015 session), please indicate if you plan to focus your student recruitment efforts in specific communities or selected attendance areas.*

Legacy Traditional School – Southwest student recruitment and marketing efforts will include a multi-tiered messaging approach which will appeal to all types of area families. An awareness campaign coupled with messaging that will resonate with all socioeconomic levels will be pursued. Families ranging from high-to-low socioeconomic backgrounds to those in poverty, from both high and low-academically achieving students to students with disabilities -- and other youth at risk of academic failure – will be among the many families who are interested in knowing more about Legacy. Invited to “Learn More”, interested parents will register with an email address and our staff will begin communicating with each individual to determine what aspects of Legacy are best suited for their child or children.

Marketing messages and campaigns are tested by focus groups that represent various populations to ensure resonance and that no message is offensive to any cultural populous. Using both traditional and digital media advertising, public-facing events for interested parents in the community are designed to attract a wide-range of socially and economically diverse populations. The general recruiting area is a 3-5 mile radius around the campus.

Marketing modalities and channels will include but are not limited to: door hangers, community outreach cards and brochures; direct mail, newspaper, bus shelter, movie theatre ads; digital banners, email, social media, local/national online directories and database ads; radio and TV are also likely. General family demographics (e.g. families with 2.5 or more in the household) will be the audience – along with inclusion of families of poverty, academically low-achieving students, students with disabilities and other youth at risk of academic failure. To reach all audiences, outreach to the counselors and social workers at local YMCAs, Boys and Girls Clubs, area churches and shelters will be pursued.

Legacy Traditional School – Southwest will accept applications for the 2019-2020 school year in October of the school year prior. Therefore, dates for submitting applications for the 2019-2020 school year will begin on or about October 1, 2018 and continue through mid-November, 2018. Thereafter, if the school has received more applications than it has available seats, a lottery will be conducted to establish which applicants to enroll according to the process outlined in SB208 and SB390 (2015 session.)

Legacy Traditional School – Southwest enrollment target will be set at 90% of the total capacity for the initial school year. This goal was established by reviewing historical enrollment data related to the inaugural year at the twelve schools that Legacy currently operates. Legacy Traditional Schools consistently strives for an 80% re-enrollment rate from one school year-

over-year. This goal is also a result of past year persistency rates at existing and established Legacy schools. Several individuals are a part of the team that monitors enrollment and retention targets. The Campus Registrar is charged with enrollment activities at the school site and is the responsible individual for tracking enrollment numbers, available seats and overall progress. Additionally, the school Principal closely monitors enrollment progress and areas of concern. Finally, staff members employed by CFE offer additional oversight and assistance regarding enrollment at the school site.

	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023
Pre-K	N/A	N/A	N/A	N/A	N/A	N/A
K	N/A	N/A	162	162	162	162
1	N/A	N/A	161	161	161	161
2	N/A	N/A	161	161	161	161
3	N/A	N/A	161	161	161	161
4	N/A	N/A	161	161	161	161
5	N/A	N/A	161	161	161	161
6	N/A	N/A	161	161	161	161
7	N/A	N/A	161	161	161	161
8	N/A	N/A	161	161	161	161
Total	N/A	N/A	1,450	1,450	1,450	1,450

Student recruitment after the school is in session is to continue, however, its objective is to build awareness that the school has opened, is a contributing member of the local community and a respected choice for Nevada families. There will be year-round awareness messages on digital media and social media, and public relations events for the community to attend. One level of emphasis for recruitment will be placed on areas of vacancy within existing grades.

Legacy Traditional School - Southwest will backfill vacancies in existing grade levels by referring to the enrollment lottery for students who may remain on the waitlist, per the process outlined in SB208 and SB390 (2015 session.) Priority will be given to those with the lowest lottery numbers and school enrollment personnel will contact, in order, interested students regarding vacancies in the school.

- (2) *Provide a detailed discussion of the school’s track record in recruiting and retaining students that reflect the ethnic, socio-economic, linguistic, and special needs diversity of the current charter school and each campus to at least the level reflected by the attendance zones where the charter school will operate facilities before approving the proposal. Please provide the school’s past enrollment and retention performance for all years since the inception of the school broken out by race, ethnicity, language other than English, disability and 504 status, and eligibility for free and reduced priced lunch both as a school and in comparison to the school’s current zoned schools.*

At this writing, Legacy opened its first campus in Nevada in North Las Vegas, and across the 13 campuses in Arizona and Nevada, Legacy attracts and successfully retains a diverse student body representative of the surrounding community. Legacy expects to adopt the same approach to the opening of a new campus in Nevada.

Community outreach, campus events and the messaging, advertising and reviews of current parents on Legacy's social media platforms are methods Legacy uses to attract a balance of students reflective of the area's ethnic, socio-economic, linguistic and special needs population.

For example: traditional and digital advertising in local and state-wide parent magazines, school directories and in community-outreach material show images of students with the ethnic, cultural and gender diversity of the area. In some cases, this may attract multi-lingual families who would like to have bilingual support in the school's front office or from teachers who are bilingual. Information gathered from potential parents on school tours with principals and registrars helps inform the school's human resource office as to the particular skills and credentials necessary for staff to fully support enrolled families.

Interest forms completed on the Legacy website build interaction with parents who want more information. As the process of getting to know us begins through emails, parents feel like they are a part of the school before they ever enroll their child. This is an important characteristic of Legacy's community building which sets it apart from other schools. We refer to this strategy as Legacy's "nurturing communications" – sharing with interested parents what some of the activities are at the school and inviting them to events and campus tours.

As an example, hosting family-oriented events in which enrolled families can bring other parents and students from area schools is key. For example, "Legacy Days" is an annual school event for families and the school's residential neighbors planned one month prior to the first day of school – with food trucks, community vendors and entertainment for children. Face-to-face events such as this allow staff and faculty to interact and for families to meet one other, fully socializing before the school year begins and also allowing children to meet one another, play on the playground etc., before sitting in classrooms together.

Other events which accomplish similar objectives are the Back-to-School-Night [event](#); Friday evening fall- and spring festivals; Saturday-at-the Movie, a recruitment event for new families on Saturday mornings where a movie theatre is rented by Legacy and a private showing of a new- release children's movie is shown. Also a hit with families is the annual "Water Day", a Saturday in the spring when Legacy rents numerous water-related bounce houses and activities, hires a DJ and invites the community.

All events are supported and promoted on the Legacy campus' Facebook page, through Instagram and on the school website. Further, Facebook "likes", "comments", "shares" and reviews are important to the community – as these are the authentic voices of the parents, often with photos, that they will share and which attract others who are potentially of the same cultural persuasion or ethnicity. Legacy has found that this technique of hosting events and showcasing the activity on social media builds a school community reflective of the diversity in the community in which it resides.

The school's past enrollment and retention performance for all years since the inception of the school broken out by race, ethnicity, language other than English, disability and 504 status, and eligibility for free and reduced priced lunch both as a school and in comparison to the school's current zoned schools--is not applicable to this application. The information is not available given that Legacy's first school in North Las Vegas was only opened two month prior to this application.

(3) Detail how the school's programmatic, recruitment, and enrollment strategies are designed to recruit, enroll, and retain a student population that is representative of the zoned schools which

prospective students would otherwise attend in the community. Schools which do not currently represent their communities based on the data identified above and are not serving an at-risk population are expected to add several of the following programmatic, recruitment, and enrollment strategies to merit approval: (1) participation in state-funded pre-K programs (including federal pre-K) for low-income students; (2) substituting online and social media marketing which advantages affluent and well-connected populations with a community-based, grassroots campaign which targets high need populations in the community, including aggressive door-to-door outreach and publishing marketing materials in each language which is spoken by more than 5 percent of families within each attendance zone; (3) an explicit commitment to serving a broad continuum of students with disabilities and the expansion of programs, including cluster programs or consortia, to meet the needs of a broad spectrum of student needs; (4) a weighted lottery which provides additional opportunities for specific target populations to be admitted to the school in a manner consistent with state and federal law; and (5) other enrollment policies and strategies which have had a demonstrated track record of success in dramatically increasing the diversity of student populations in a high achieving charter school to at least the poverty, disability, and ELL profile of the zoned school.

Significant demographic, ethnographic and psychographic norms are studied as Legacy Traditional joins a community to ensure that the diversity of the surrounding community is mirrored in its enrolled student population. Programmatic offerings at the junior high level, such as foreign language (Spanish) are considered along with a host of other choices that are of interest and of value to the immediate community and its families. Likewise, student recruitment efforts are also reflective of the local community – from paid advertising in traditional media to social media posts, our images of people interacting and who are of a diverse cultural nature. To further reflect and embrace the cultural diversity of the area, events such as pancake breakfasts to a “9/11 Commemoration Day” or celebrations for Cinco De Mayo, in an area where such events are the norm, are adopted by the school as a way to connect and form community ties. Retention of students is key to the success of the school – once a student starts with Legacy, we intend that he/she will stay through 8th grade graduation. To ensure retention success, parental involvement (12 hours per year) is encouraged. When parents are involved in their children’s education, and in the PTO or active in their child’s events at the school, they will find their interaction with other families highly rewarding and supportive. This is an additional and proven component to Legacy’s reputation/record on student retention.

(4) What is the enrollment calendar for both the first year of operation and subsequent years of operation? Please specify the dates on which the school will begin accepting applications and how long the enrollment window will last prior to conducting a lottery.

In accordance with NRS 386.580, before LTS enrolls pupils who are eligible for enrollment, the Governing Board will provide enrollment priority to the following groups of children:

- A member of the committee to form the school or the governing body; or employed by the school;
- A sibling of a pupil who is currently enrolled in the school;
- A student currently attending a Legacy Traditional School or that elects to transfer to another

For the first year of operations, LTS will make a reasonable effort to notify each household located within 2 miles from the school of the date the school will begin accepting applications. This notification will be conducted at least 45 days before the indicated date, anticipating all notifications received by August 15, 2018. We anticipate opening enrollment on October 1, 2018 and continuing through mid-November 2018, guaranteeing compliance with SB390. The lottery

will take place on November 15, 2018. Grades that are not oversubscribed on November 16, 2018 will accept the enrollment of eligible students in the order in which the application was received.

For subsequent years of operation, re-enrollment will take place in the second half of January. Enrollment will open following the re-enrollment period in early February each year.

- (5) *What enrollment targets will you set and who will be responsible for monitoring progress towards these targets? What is your target re-enrollment rate for each year? How did you come to this determination? What are the minimum, planned, and maximum projected enrollment at each grade level? Outline specific targets in the table below.*

Legacy Traditional School - Southwest's enrollment target will be set at 90% of the total capacity for the initial school year. This goal was established by reviewing historical enrollment data related to the inaugural year at the nine schools that Legacy currently operates. Legacy Traditional School – Southwest will consistently strive for an 80% re-enrollment rate from one school year to the next. This goal is also a result of past year persistency rates at existing and established Legacy schools. Several individuals are a part of the team that monitors enrollment and retention targets. The Campus Registrar is charged with enrollment activities at the school site and is the responsible individual for tracking enrollment numbers, available seats and overall progress. Additionally, the school Principal closely monitors enrollment progress and areas of concern. Finally, the Compliance team of the EMO performs monthly and quarterly audits of the campus enrollment process and assistance regarding enrollment at the school site.

- (6) *What systems will you put in place to ensure that staff members are knowledgeable about all legal enrollment requirements pertaining to special populations and the servicing of particular populations of students and can answer parent inquiries in a manner consistent with the letter and spirit of state and federal law?*

All staff members involved with the enrollment process at Legacy Traditional School – Southwest are trained in legal enrollment requirements pertaining to special populations. We have policies and procedures regarding school enrollment to ensure that legal compliance requirements are constantly maintained. In addition, Campus Registrars are provided extensive training upon hire and receive monthly training to remain updated on changes to enrollment policies and procedures.

- (7) *Describe the student recruitment plan once your school has opened. In what ways will it be different than your pre-opening year, in terms of the strategies, activities, events, persons responsible and milestones? How will the school backfill vacancies in existing grades?*

Once Legacy Traditional has opened in Southwest, student recruitment continues but concentrates on filling vacancies in vacancies at specific grade levels. Now with a facility that has learning activities observable to others, digital ads featuring students, teachers are possible. This type of content that can be leveraged across email and traditional newspaper advertising creates awareness in the community that school choice exists. Hosted events such as registering for school tours on the school's website, attending Parent Informational Meetings, advertising Spring and Fall festivals along with the annual school musical which can involve more than 200 children performing -- are all proven techniques which attract families and students who identify with the school's philosophy of learning.

(8) Complete the following tables for the proposed school to open in 2017-18. Schools applying for multiple campuses must complete enrollment summary tables for each school campus opening in fall 2017 and fall 2017.

(a) Minimum Enrollment (Must Correspond to Break Even Budget Scenario Assumptions discussed in budget narrative)

Grade Level	Number of Students					
	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Pre-K	0	0	0	0	0	0
K	0	162	162	162	162	162
1	0	161	161	161	161	161
2	0	161	161	161	161	161
3	0	161	161	161	161	161
4	0	161	161	161	161	161
5	0	161	161	161	161	161
6	0	161	161	161	161	161
7	0	161	161	161	161	161
8	0	161	161	161	161	161
9	N/A	N/A	N/A	N/A	N/A	N/A
10	N/A	N/A	N/A	N/A	N/A	N/A
11	N/A	N/A	N/A	N/A	N/A	N/A
12	N/A	N/A	N/A	N/A	N/A	N/A
Total	0	1,450	1,450	1,450	1,450	1,450

(b) Planned Enrollment (Must Correspond to Budget Worksheet Assumptions)

Grade Level	Number of Students					
	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Pre-K	0	0	0	0	0	0
K	0	162	162	162	162	162
1	0	161	161	161	161	161
2	0	161	161	161	161	161
3	0	161	161	161	161	161
4	0	161	161	161	161	161

5	0	161	161	161	161	161
6	0	161	161	161	161	161
7	0	161	161	161	161	161
8	0	161	161	161	161	161
9	N/A	N/A	N/A	N/A	N/A	N/A
10	N/A	N/A	N/A	N/A	N/A	N/A
11	N/A	N/A	N/A	N/A	N/A	N/A
12	N/A	N/A	N/A	N/A	N/A	N/A
Total	0	1,450	1,450	1,450	1,450	1,450

(c) Maximum Enrollment (Note: Enrolling more than 10 percent of the planned enrollment described in subsection b will necessitate a charter amendment)

Grade Level	Number of Students					
	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Pre-K	0	0	0	0	0	0
K	0	162	162	162	162	162
1	0	161	161	161	161	161
2	0	161	161	161	161	161
3	0	161	161	161	161	161
4	0	161	161	161	161	161
5	0	161	161	161	161	161
6	0	161	161	161	161	161
7	0	161	161	161	161	161
8	0	161	161	161	161	161
9	N/A	N/A	N/A	N/A	N/A	N/A
10	N/A	N/A	N/A	N/A	N/A	N/A
11	N/A	N/A	N/A	N/A	N/A	N/A
12	N/A	N/A	N/A	N/A	N/A	N/A
Total	0	1,450	1,450	1,450	1,450	1,450

(9) Describe the rationale for the number of students and grade levels served in year one and the basis for the growth plan illustrated above. Note: particular weight will be given to rationales which prioritize academic achievement over financial returns.

The number of students shown above is a reflection of the number of students by grade level on our current interest list. The school will be at full capacity in year one and therefore the basis of growth illustrated above is a reflection of the school operating at full capacity each

year. Legacy Traditional School-Southwest is a boundary free public charter school. Enrollment is determined by lottery and academic achievement is always a priority,

(a) Schools proposing to open new elementary facilities with more than 400 students or more than 3 grade levels should identify and discuss the specific elements of the school model and organizational track record detailed throughout the request that demonstrate that the proposed expansion model is designed to compensate for the known organizational and academic challenges which accompany serving larger student bodies and multiple grade levels in a start-up environment.

Detailed throughout this request, the Legacy network has over ten years of experience successfully opening new schools with severely large student bodies.

(b) Schools proposing to add a new middle or high school facility with more than 200 newly enrolled students in sixth grade or above or more than 2 grades above fifth grade should identify and discuss the specific elements of the school model and organizational track record detailed throughout the request that demonstrate that the proposed expansion model is designed to compensate for the known organizational and academic challenges which accompany serving larger student bodies and multiple grade levels in a start-up environment.

Detailed throughout this request, the Legacy network has over ten years of experience successfully opening new middle schools (within the K-8 school environment) with severely large student bodies.

Board Governance

- (1) *Explain the governance philosophy that will guide the board, including the nature and extent of involvement of key stakeholder groups.*

The philosophy of the Legacy Traditional School Board is to serve the best interest of all students. The Board will ensure that teachers, staff, parents/guardians, and other stakeholders interested in an investment of education in Nevada have an opportunity to improve the learning of students within the state and ultimately improve the system of public education. The Board recognizes the realization of this philosophy will occur through collaboration with key stakeholders including, but not limited to: the Southwest community, the City of Henderson, State of Nevada Department of Education, the Nevada State Board of Education, and the Nevada State Public Charter School.

- (2) *Describe the governance structure of the expanded school when the board is fully composed, including the primary roles of the governing board and how it will interact with the principal/head of school and any advisory bodies. Explain how this governance structure and composition will help ensure that a) the school will be an educational and operational success; b) the board will evaluate the success of the school and school leader; and c) there will be active and effective representation of key stakeholders, including parents.*

Legacy Traditional School is a non-profit, tax-exempt (501c3) entity that operates the charter school. The school's Governing Body will provide knowledgeable oversight of the school's operations, financial matters, and student growth and achievement. In cooperation with the EMO, the Governing Board will provide strategic direction for the school, nurture strong school leaders, and ensure the school's financial and legal security. The Legacy Traditional School Board will carry out a number of roles directly or indirectly through their EMO, which include approving curriculum; enforcing the program of instruction; establishing school wide policies and procedures; and providing oversight of the school's budget. The Board shall have final authority and responsibility for the academic, financial, and organizational performance of the school, and the fulfillment of the charter contract. The Board shall be the final authority in matters affecting the school, including but not limited to staffing, job titles, employee salaries and benefits, financial accountability and curriculum. The Board shall act in accordance with and is subject to the Nevada Open Meeting Law, Public Records Law, and Nevada Local Government Purchasing laws (NRS 332.039-.148).

In addition to the responsibilities of the Board, the structure of the Board is designed to ensure the school will be an educational and operational success. The Board is made up of: two licensed educators, one parent/legal guardian and two members who possess knowledge and expertise in on or more of the following fields;

1. Accounting
2. Financial Services
3. Law
4. Human Resources

The board will evaluate the success of the school and school leader based on the established school goals and the Principal's individual goals. The Principal's evaluation can be located in Attachment 4. As the evaluator of the school goals and Principal goals, the Board may interact with the Principal as often as needed to monitor progress.

The entity may appoint additional members to the Board (stakeholder representation), as it deems necessary, appropriate, or proper. A board succession strategy and building a bench of board members will be developed. A majority of the persons who serve on the Board must be

residents of Nevada. In addition to the members who serve, the Board may include, without limitation, not more than four additional members as follows:

- (a) Members of the general public; or
- (b) Representatives of nonprofit organizations and businesses; or
- (c) Representatives of a college or university within the Nevada System of Higher Education.

Each member of the Board will be assigned to a committee in one of the six advisory groups. Each group will provide opportunities for stakeholder participation on an ongoing basis or in an isolated project related to the group's area of emphasis. The Board member will serve as the group "Chair" and assign roles and duties to other members based on relevant factors related to the subject. Group findings will be shared during quarterly or monthly, open board meetings.

- (3) *Please submit board member information for current and proposed new board members in the provided Board Member Template (provide as part of Attachment 17). Please note that at least 75% of new board members for SY 2017-2017 must be identified at the time of the submission of the expansion request.*

See Attachment 17

- (4) *Provide, as part of Attachment 17, a completed and signed Board Member Information Sheet for each proposed new Board member as well as the board member's resume and a thoughtful biographical summary outlining the particular qualifications of each board member as relates to both service on a public charter school board and to the specific needs of this particular charter school.*

See Attachment 17

- (5) *Describe the board's ethical standards and procedures for identifying and addressing conflicts of interest. Will the board be making any changes to its Bylaws, Code of Ethics, and Conflict of Interest policy in light of the expansion or new statutory or regulatory requirements, including SB509?*

No changes to the Bylaws have been made. The Board's ethical standards and procedures for identifying and addressing conflicts of interest, Code of Ethics, and Conflict of Interest Policy are outlined in the Nevada Policies and Procedures/Series 100, Governance. This document will be delivered to SPCSA staff and available for review by this application's readers.

- (6) *Identify any existing, proposed, or contemplated relationships that could pose actual or perceived conflicts if the expansion request is approved, including but not limited to any connections with landlords, developers, vendors, or others which will receive compensation or other consideration directly or indirectly from the school; discuss specific steps that the board will take to avoid any actual conflicts and to mitigate perceived conflicts, including the new requirements of a Code of Ethics in SB509 and the nepotism regulations applicable to charter schools.*

There are no conflicts related to this expansion request. Therefore, this question is not applicable for this application.

- (7) *Describe the board's history since inception, including a discussion of turnover. How does the board proactively manage governance and succession? How does the board propose to significantly exceed the statutory minimum criteria for board qualifications in light of the complexity and risk associated with governing a large, multi-site charter school network? What elements, characteristics, and behaviors of specific, analogous high performing multi-site charter school networks, non-profit social enterprises, and for-profit organizations with similar levels of revenues or complexity has the*

governing body elected to emulate in its governance and in the operation of the school? Describe concrete and specific plans for increasing the capacity of the governing board. How will the board continue expand and develop over time?

The LTS-Nevada board formed in February 2016 and has been committed since inception. LTS-Nevada has had one Board member who has transitioned out for professional reasons; however, every current board member has a deep commitment to LTS-Nevada. The Board consists of a highly qualified group of volunteers including an innovative marketing strategist, two educators both experienced Special Education teachers; one with a secondary career as an Assemblywoman with the Nevada State Legislature, a parent representative who owns her a Property Management company and an attorney. LTS-Nevada will continue to reach out to community resources to ensure a large consortium of candidates in the case of succession.

With the addition of a new campus, the LTS-Nevada board will focus their efforts on providing structure and hire an executive staff to safeguard quality and consistency across the network without compromising the mission and vision of LTS- Nevada. The Board will utilize innovative tools to monitor the operational, financial and academic performance of each campus along with training to prepare the Board for handling this increased capacity to guarantee consistency.

- (8) Describe the kinds of orientation or training new board members will receive and what kinds of ongoing development existing board members will receive. The plan for training and development should include a timetable, specific topics to be addressed, and requirements for participation.*

The LTS-Nevada board will conduct training annually or individually offer training to new Board Members upon appointment. The Board Members will receive training in the following areas: Board Training, Charter Application and Amendments, SPCSA Charter Contract, Statement of Assurances, Organization of the Board, Bylaws, Open Meeting Law, Code of Conduct, Regular Board Meetings, Code of Ethics, Conflict of Interest Policy, Whistle Blowing, Board Goals, Lines of Communication, Decision Making, The Role of the EMO, Nevada Revised Statutes, Nevada Administrative Code, Every Student Succeeds Act, FERPA and Public Records Law, Records Retention and Disposal Policies and Procedures, Title II of the Americans with Disabilities Act, Title IX of the Educational Amendments of 1972, Title IV of the Civil Rights Act of 1964, Individuals with Disabilities Education Improvement Act (IDEA), Section 504 of the Rehabilitation Act, Nevada Government Purchasing Laws (NRS 332.039-148) and Acronyms for School Board Members.

- (9) Describe the working relationship between the board and staff (academic, operations, and financial) and the working relationship between the board, staff, and any education management organization. Outline the regular reports that will be provided to the board, their frequency, and who will provide them. This may include financial, operational, and/or or academic reports.*

The board has a close working relationship CFE Management Group's staff and will develop a close working relationship with staff once they are hired. Monthly reports are provided to the board for their review and consideration for agenda items. Reports include state academic results, academic data dashboards, enrollment/attendance/persistence rates, survey results, annual budgets, monthly budget to actual statements, income statements, balance sheets and cash flow statements.

- (10) Describe any advisory bodies or councils to be formed, including the roles and duties of those bodies. Describe the planned composition; the strategy for achieving that composition; the role of parents,*

students, and teachers (if applicable); and the reporting structure as it relates to the school's governing body and leadership.

Each member will be assigned to a committee in one of the six advisory groups that meet as needed and share findings with other Board members and stakeholders. The emphasis area of each group includes:

1. Development
2. Real Estate
3. Board Development
4. Finance
5. Governance
6. Capital Campaign

(11) Explain the process that the school will follow should a parent or student have an objection to a governing board policy or decision, administrative procedure, or practice at the school.

Parents or students that have an objection to a governing board policy or decision, administrative procedure, or practice at the school will be encouraged to contact the staff of the Nevada State Public Charter School Authority.

(12) What goals will be established for the board and how will board members be held accountable? Outline the key expectations for board members in the table below. What actions would trigger removal from the board and under what process?

Goal	Purpose	Outcome Measure
Improve the academic achievement of pupils through the accomplishment of the vision of the school	Ensure a positive impact on all students in the community	Legacy Traditional School maintains full enrollment capacity. Measurable increase in proficiency rates in the county as measured by the Nevada annual assessment results
Ensure the fidelity of the mission of the school	When executed with fidelity, the mission has been proven to be a formula for student achievement.	Results from CFE validation visits, results from SPCSA visits, results from the academic and financial framework
Create and maintain a school culture where students are healthy, safe, engaged, supported and challenged	Stakeholder and authorizer expectations that this goal is met and sustained	High parent satisfaction survey results, high academic results, high persistency results, high enrollment/attendance, low incident results
Create and maintain core values of strong work ethic, integrity, patriotism, responsible citizenship,	Stakeholder and authorizer expectations that this goal is met and sustained	High parent satisfaction survey results, high academic results, high

discipline, teamwork, and honor

Confirm compliance with the Charter Contract

The Charter Contract is viewed by the School Board as a guide to create and maintain a highly functioning charter school.

persistence results, high enrollment/attendance, low incident results

Legacy Traditional School will exceed all indicators, measures, metrics and targets set out in the SPCSA, Charter School Performance Framework.

[Remainder of page intentionally left blank.]

Incubation Year Development

(1) *Provide a detailed start-up plan as well as specific organizational goals for the planning year (SY 2015-2017) to ensure that the school is ready for a successful launch in fall 2017. Using the template provided, outline key activities, responsible parties, and milestones and submit as Attachment 18.*

See Attachment 18

(2) *Please describe the plans for leadership training and development of the selected school leader during the incubation year prior to school opening and how these plans support your year 0 goals. If partnering with an organization, please briefly describe the main components of the training program.*

The school leadership team will spend several weeks working in Arizona working in a Legacy Traditional Schools and with CFE Management Group administrators as part of the leadership training and development during the incubation year. The school leadership team will be selected following the Authority's approval of this proposal. Compensation for these leaders during the incubation year development will be negotiated in the management agreement. The main components of the training of the leadership team that will be received during the incubation year include:

- History, philosophy, vision and expectations
- New employee orientation
- Board introduction and onboarding
- Charter proposal and contract
- Work schedule leading up to the new school opening (split time between community visits, job shadowing at schools, validation visits with academic team, working at the temp office)
- Management agreement
- Organizational Chart
- Student Handbook
- School calendar for the new school
- Employee handbook
- New School Task List
- New Hire Checklist
- School related academic data
- Demographics of the LTS school that the new school will closest resemble
- Training on all of Legacy's Policies and Procedures
- Training on the school budget
- Informational Technology Training
- Trainings on School Leadership Meetings
- Training on all upcoming events related to the new school (ground breaking, parent information nights, job fairs, etc.)
- Schedule visits in the community and introduce Legacy to key community stakeholders
- Schedule participation on the validation team visits at current Legacy schools
- Schedule Spalding I and II training
- Participation in the new teacher orientation
- Introduction to CFE Officers and Directors
- Training related to the Principal's job duties as well as the Board and CFE's duties and responsibilities

(3) Explain who will work on a full-time or nearly full-time basis immediately following assignment of a location to lead development of the school(s) and the plan to compensate these individuals.

The EMO will provide many services during the inaugural year to prepare for the opening of the school. It is intended to hire the Superintendent, Principal and Registrar in November of the inaugural year. These initial three employees will be directly responsible for communication with parents, enrollment and hiring. The salaries for the inaugural year are built into the campus financials and are covered through loans during this year.

School Management Contracts

If the school does not intend to amend an existing management contract or enter into a new management contract with a for-profit or non-profit education management organization (EMO), please explain that this sub-section is “Not Applicable” and skip to the next sub-section.

(1) How and why was the EMO selected?

The governing board of Legacy has chosen CFE Management Group, LLC (“CFE”) as the Educational Management Organization (EMO) based on the full range of services provided and the highly successful track record of managing the other Legacy campuses. CFE has established a proven track record in the following areas: curriculum development, teacher training, marketing, financial services, human resource services, information systems, facilities management, food service management, and grant compliance.

(2) Explain whether the management organization will provide services to the charter school as a whole or will it be assigned to provide specific services at an individual campus or campuses or a particular program (e.g. a portfolio management governance model).

CFE will provide direct services as a whole in the following areas: marketing, financial services, human resource services and information systems. CFE will provide support through training and oversight in the following areas that are directly handled by Legacy: curriculum development, teacher training, facilities management, food service management and grant compliance.

(3) Describe the relationship between the school governing board and the service provider, specifying how the governing board will monitor and evaluate the performance of the service provider, the internal controls that will guide the relationship, and how the governing board will ensure fulfillment of performance expectations.

Each Legacy School is governed by a five-member board of directors (the “Board”), elected by a majority vote of the members of the Board. Members are elected to serve staggered, three-year terms. The Board is the governing body and the ultimate authority at the school, responsible for all school operations. The Board contracts with CFE to handle much of the day-to-day administrative and academic operations at the school. The Board is responsible for adopting and directing school and board policies and procedures, assuring that policies and procedures are implemented, and keeping the School in compliance with the Charter School Contract, applicable State and federal laws, and the school’s accounting requirements. The management contract between the Board and CFE is signed at the option of the Board, and the Board has the ability to not renew the contract at the end of the term or to pursue terminating the contract if the services performed are not satisfactory.

(4) Disclose fully and provide an explanation of any existing or potential conflicts of interest between the school governing board and proposed service provider or any affiliated business entities, including, without limitation, any past or current employment, business or familial relationship between any officer, employee, or agent of the proposed service provider and any prospective employee of the charter school, a member of the committee to form a charter school or the board of directors of the charter management organization, as applicable.

Legacy Traditional School – Southwest has no conflicts of interest between the school governing board and EMO or any affiliates. Therefore, this question is not applicable for this application.

(5) Please provide the following in Attachment 19:

- (a) A term sheet setting forth the proposed duration of the contract; roles and responsibilities of the governing board, the school staff, and the service provider; scope of services and resources to be provided by the EMO; performance evaluation measures and mechanisms; detailed explanation of all fees and compensation to be paid to the provider; financial controls and oversight; methods of contract oversight and enforcement by the governing board and/or school staff; investment disclosure; and conditions for renewal and termination of the contract;*
- (b) A draft of the proposed management contract which complies with NRS 386.562 and SB509 (2015 session) and all other applicable laws and regulations;*
- (c) As an exhibit to the proposed management contract, a crosswalk of the academic, financial, and organizational goals of the charter school set forth in the SPCSA Charter School Performance Framework, including the school's mission-specific goals, and a clear identification of each of the performance goals and expectations for the education management organization related to each charter school goal. This will serve as the board's primary evaluative tool for the education management organization.*
- (d) Documentation of the service provider's for-profit or non-profit status and evidence that it is authorized to do business in Nevada.*

See Attachment 19

- (6) Provide a brief overview of the organization's history.*

Legacy Traditional School (LTS) applied for and received its original charter to operate a K-6 school in January 2006 and first opened its doors in September of 2007. LTS applied for and received the requested addendum to operate a K-8 school in May 2007 for the new Maricopa and Casa Grande campuses. The charter was amended to add the Queen Creek campus in May of 2010. New charters were created for Avondale, Chandler, and NW Tucson in the spring of 2011 and each operate as separate charters. The Laveen campus was chartered in spring 2012 on its own separate charter. The Gilbert campus was chartered in the spring of 2013 on its own separate charter. The Surprise campus was chartered in the spring of 2015 on its own separate charter. The North Chandler, Glendale and Peoria campuses were chartered spring of 2016. Lastly, Legacy Traditional Schools – Nevada was chartered in October of 2015.

- (7) List any and all charter revocations or surrenders, bankruptcies, school closures, non-renewals, or shortened or conditional renewals for any of the schools managed by the organization and provide explanations. For all such schools, please provide contact information, including name, business mailing address, business telephone number—including extension or direct line, and business email address, for the current leader of the school's authorizing office and a summary of the correspondence or discussions between members of the governing body and this individual and other knowledgeable authorizer personnel contacted. Include a summary of all performance issues related to each revocation, surrender, bankruptcy, closure, non-renewal, or shorted or conditional renewal. Discuss the lessons learned by the governing body based on this ongoing due diligence and how this research has informed provisions that the governing body has required in the proposed management agreement.*

Legacy Traditional School has no revocations, surrenders, bankruptcies, closures, non-renewals, shortened or conditional renewals. Therefore, this question is not applicable for this application.

- (8) Explain any performance deficits or compliance violations that have led to formal authorizer intervention with any school managed by the organization. Provide details as to how such deficiencies were resolved. For all such schools, please provide contact information, including name, business mailing address, business telephone number—including extension or direct line, and*

business email address, for the current leader of the school's authorizing office and all other authorizer personnel contacted. Include a summary of the correspondence or discussions between members of the governing body and this individual and other knowledgeable authorizer staff regarding all performance issues related to each non-renewal, shortened or conditional renewal, or renegotiation or reduction in services. Discuss the lessons learned by the governing body based on this ongoing due diligence and how this research has informed provisions that the governing body has required in the proposed management agreement.

Legacy Traditional School has never had a deficit or compliance violation. Therefore, this question is not applicable for this application.

(9) List any and all management contract non-renewals, shortened or conditional renewals, or renegotiations or reductions in services provided for any of the schools managed by the organization and provide explanations. For all such schools which are still in operation, please provide contact information, including name, legal home or business mailing address, home or business telephone number, and personal or business email address, for the current board chair office and all other board members and school personnel contacted. Include a summary of the correspondence or discussions between members of the governing body and this individual and other knowledgeable staff or board members regarding all performance issues related to each non-renewal, shortened or conditional renewal, or renegotiation or reduction in services. Discuss the lessons learned by the governing body based on this ongoing due diligence and how this research has informed provisions that the governing body has required in the proposed management agreement.

Legacy Traditional School has never had a contract non-renewal, shortened or conditional renewals, renegotiations or reductions in services. Therefore, this question is not applicable for this application.

Services

(1) *Provide, as Attachment 20, a description of how the school leadership team will support operational execution. Please provide narrative or evidence that illustrates the staffing model, performance metrics, and the school's plan for supporting all operational needs of the school, including but not limited to those listed below. In this space and in the finances section, demonstrate how you will fund the provision of these services.*

See Attachment 20

(a) *Transportation: Describe your plans for providing student transportation. If the school will not provide transportation, please identify how the school will ensure that this does not serve as a barrier to enrollment or ongoing attendance.*

Legacy Traditional School will not provide student transportation beyond federal requirements under the McKinney Vento Act and for students with Individualized Education Plans (IEP) that designate required transportation. Transportation to and from school will be the responsibility of the parent/guardian. Legacy Traditional School will make every effort to communicate to parents prior to enrollment that transportation is not provided by the school to ensure that this does not serve as a barrier to enrollment or ongoing attendance.

(b) *Food Service: Outline your plans for providing food service at the school, including whether and how you will be your own school food authority or will contract with another provider. If the school will not provide food service, please identify how the school will ensure that this does not serve as a barrier to enrollment or ongoing attendance.*

All Food Services will be provided on site with assistance from the Legacy's proposed EMO, CFE Management Group. CFE provides all training and process manuals, coordinates all health permits and licenses, coordinates the purchase of all necessary equipment, assists in the hiring and training of all staff, and provides periodic audits of the food operations for compliance with all regulations. The Food Service program is funded through revenue collection of food sales.

(c) *Facilities maintenance (including janitorial and landscape maintenance)*

All maintenance, landscape and custodial services will be provided by Legacy. Legacy Traditional School will hire: a Facility Manager, a Landscaper, and a custodial team whom will be able to provide all ongoing services for the school in-house. CFE will provide: all training and process manuals, coordinate the purchase of all necessary equipment, assist in the hiring and training of all staff, and complete periodic audits for compliance with all regulations.

(d) *Safety and security (include any plans for onsite security personnel)*

Legacy Traditional School will create an Emergency Response Plan and Crisis Intervention Procedures with assistance from the EMO and local authorities. Fire drills, evacuation drills and lockdown drills will be rehearsed on a regular basis. On-site security oversight will be provided by the campus administrators and Facility Manager.

(2) Technology: Outline the technology infrastructure and support mechanisms across your school, staff, and teachers. Your outline should include but not be limited to reliable and secure wide area networking, local area networking (e.g., wireless and cables), hardware (e.g., personal computing devices, servers, telephony, storage, routers, switches), technology policies and procedures, device management, and end user support, including the management of user rights and privileges.

Connectivity and Services: Legacy's IT Department uses a Private Port MPLS WAN network to connect campuses directly and securely to schools in the Legacy Traditional Schools' system servers and services using a star topology with the EMO as the hub of all activity. Each campus maintains a separate internet connection in addition to the MPLS for access to our hosted SIS. Typical speeds vary from 30Mbps to 3000Mbps, with the majority at 3000Mbps. Two T1s operating in PRI mode provide telephony service for incoming and outgoing calls. Legacy Traditional School utilizes a District-wide ShoreTel phone system for all telephony needs. Internet traffic is filtered through a CIPA compliant firewall made by Watchguard. Wireless access is provided via Ubiquiti Networks UniFi system and is a closed network with no guest access allowed. Student labs are on a whitelist only basis for internet sites. All other sites outside of the whitelist are blocked by default. Paging campus-wide is accomplished via an iPhone paging system or a Telecor-based paging system. Verizon is used for all cell phone needs as well as the occasional MiFi usage.

Campus Infrastructure: Each campus has a network system built on CAT5e or CAT6 wiring with fiber runs from the MDF to IDF locations. A typical Gigabit backbone is used for all network communications. HP Gigabit switches with fiber interconnects form the communication heart for each campus. Voice and Data are on separate physical paths to avoid congestion with a third physical path for the PoE and data on the Wi-Fi system. All wiring is plenum rated and is consolidated for clean runs using J hooks and D rings in the plenum. Three enterprise level servers provide for the needs of the campus for Active Directory security, Hyper-V based desktop images for all teachers and ShoreTel services.

Classroom Technology: Each classroom at LTS utilizes a 10zig zero-client computing station. Additional technology such as in-room paging and a ceiling mounted projector is also included. Typical connections include a VGA port at the front of the class for a document camera, and an HDMI connector at the back under the teacher's desk for the teacher to mirror what is onscreen to the students in class. iPads are used by the Physical Education Department to monitor and maintain attendance while outside on the fields.

End user Support: The Legacy IT Department has a posted response time of 8 hours or less for minimal to moderate issues. The average response time for requests is currently less than half that time. Outages that are campus-wide are dealt with on a priority basis, with most outages resolved in the same day or less. The IT Department currently services over 1000 employees in the Legacy Traditional School District. End users may use email, an online request form, or telephone services to contact IT

(3) Student Information Management: Timely communication of accurate student information is critical for payments to schools, compliance, and performance monitoring. Please describe how you will manage student information using the statewide Infinite Campus system, and how you will build capacity around the use of the software in order to independently maintain the system. Detail the staff members who will enter data along with the project manager who will commit to trainings and regularly monitor student information for accuracy.

The Legacy Traditional School site Registrar and the EMO's Compliance team will be trained to utilize the Infinite Campus SIS. The ideal Registrar candidate will have previous experience working with Infinite Campus. The EMO's Compliance team will attend training seminars to become knowledgeable and proficient on the Infinite Campus System. The EMO's Compliance team and the school Registrar will provide training and support to the school personnel. The school personnel will track enrollment and daily attendance. CFE will provide regular audits of their data for state compliance and accuracy.

(4) Data Security: SPCSA charter schools record, generate and consume data that falls under strict requirements for security, privacy, and retention (including FERPA and recent legislation related to the protection of personally identifiable information (PII)). Describe the systems and procedures you will implement in order to ensure you are compliant with these obligations.

Policies and procedures related to security and privacy of student and employee personally identifiable information has been created for Legacy Traditional School. The Legacy Traditional School administration, faculty and staff will receive annual FERPA and HIPAA training and sign attestations of compliance. Access to any student, parent and/or employee information is user name and password protected and accessible only to those with appropriate security levels. All Personally Identifiable Information for students and parents is protected by Infinite Campus, whose security meets requirements established by statute. All Personally Identifiable Information for employees is protected by Applitrack and ADP, whose security meets requirements established by statute.

Student Data Folders are protected within the closed Legacy system network. Other programs that are used to store student/parent information utilized by Legacy Traditional School include: IEPPro, Meals Plus, InfoSnap, Alert Solutions, and Driveline in which all maintain the same level of security the SIS has.

Student cumulative records are locked and secured in the school Registrar's office. Policies and procedures related to the maintenance of the student cumulative records have been created for Legacy. The school will create policies and procedures to comply with the Nevada State Library, Archives and Public Records retention schedule. Training on the policies and procedures will be provided to the school Administrators and the school Registrar by the CFE Management Group staff. Finally, parent volunteers sign attestations to secure and not disclose student information.

Facilities

- (1) Describe the school's capacity and experience in facilities acquisition and development, including managing build-out and/or renovations, as applicable. Provide a description and analysis of any construction or development delays which have impacted a school or campus calendar and schedule in the past and a discussion of any organizational or operational adjustments that have been made to prevent recurrence in the future.*
- (2) Identify the entity responsible for acquiring and maintaining school facilities and describe that entity's relationship to both the school and any management organization. If costs related to the facility will be borne by the proposed school's education management organization or a related party such as a foundation, it should identify the level of capital support the organization (or related party) is willing to provide to the school.*

Reviewers seeking information on our management model with the EMO for the expanded school may wish to refer to the section labeled School Management Contracts on page ** and Attachment 19.

- (3) If a proposed facility has been identified and requires no construction or renovation prior to the commencement of instruction, please provide:*

Legacy Traditional School-Southwest will be constructed from the group up; therefore, items (a) through (g) are not applicable.

- (a) The physical address of the facility and supporting documentation verifying the location, including the Assessor's Parcel Number and a copy of the Assessor's Parcel Map for the proposed facility as Attachment 4*
 - (b) A copy of the proposed purchase and sale agreement or a copy of the proposed lease or rental agreement as Attachment 5*
 - (c) A copy of the floor plan of the facility, including a notation of the size of the facility which is set forth in square feet as Attachment 6*
 - (d) The name, address, and full contact information of the current owner of the facility and any proposed landlord and a disclosure of any relationship between the current owner or landlord and the school, including but not limited to any relative of a board member or employee within the third degree of consanguinity or affinity and any connection with an educational management organization, foundation, or other entity which does business with or is otherwise affiliated with the school as Attachment 7*
 - (e) A copy of the Certificate of Occupancy at Attachment 8*
 - (f) Documentation demonstrating that the proposed facility meets all applicable building codes, codes for the prevention of fire, and codes pertaining to safety, health and sanitation as Attachment 9*
 - (g) Documentation demonstrating the governing Body has communicated with the Division of Industrial Relations of the Department of Business and Industry regarding compliance with the federal Occupational Safety and Health Act (OSHA) in compliance with NAC 386.3265 as Attachment 10*
- (4) If a proposed facility has not been identified or the proposed facility requires any construction or renovation prior to the commencement of instruction, please provide:*

(a) Either a discussion of the desired community of location and the rationale for selecting that community AND an assurance that the school will submit the documentation required in 1(a) for review and approval prior to acquisition of any facility in compliance with NAC 386.3265 as Attachment 4 OR the physical address of the proposed facility which requires construction or renovation and supporting documentation verifying the location, including the Assessor's Parcel Number and a copy of the Assessor's Parcel Map for the proposed facility as Attachment 4

See Attachment 4

(b) Either a narrative explaining the rationale for the budgeted cost of acquisition of an owned or leased facility AND an assurance that the school will submit such documentation for review and approval prior to acquisition of any facility in compliance with NAC 386.3265 as Attachment 5 OR, if a facility has been identified which requires construction or renovation, a copy of the proposed purchase and sale agreement or a copy of the proposed lease or rental agreement as Attachment 5

See Attachment 5

(c) Either a discussion of the general specifications to be utilized during the facility search, including approximate square footage AND an assurance that the school will submit such documentation for review and approval prior to acquisition of any facility in compliance with NAC 386.3265 as Attachment 6 OR, if a facility location has been identified but requires construction or renovation, a copy of the proposed floor plan of the facility, including a notation of the size of the facility which is set forth in square feet AND an assurance that the school will submit final documentation in compliance with NAC 386.3265 as Attachment 6

See Attachment 6

(d) Either a description of the process and resources the school will use to identify a facility AND an assurance that the school will submit such information for review and approval prior to acquisition of any facility in compliance with NAC 386.3265 as Attachment 7 OR, if a facility has been identified but requires construction or renovation, the name, address, and full contact information of the current owner of the facility and any proposed landlord and a disclosure of any relationship between the current owner or landlord and the school, including but not limited to any relative of a board member or employee within the third degree of consanguinity or affinity and any connection with an educational management organization, foundation, or other entity which does business with or is otherwise affiliated with the school as Attachment 7

See Attachment 7

(e) A detailed construction project plan and timeline, including a Gantt chart, identifying all facility development activities necessary to obtain a full certificate of occupancy prior to the first day of school AND documentation of the inspection and approval processes and timelines for the state, municipal, or county agencies which will issue the Certificate of Occupancy, including a discussion of whether such agencies issue temporary or conditional approvals and a copy of the standard form documentation that the sponsor can consult in such circumstances to confirm compliance with NAC 386.3265 as Attachment 8

See Attachment 8

(f) A detailed construction project plan and timeline, including a Gantt chart, identifying all facility development activities necessary to obtain all such code approvals prior to the first day of school AND documentation of the inspection and approval processes and timelines for the state, municipal, or county agencies which will conduct all code inspections, including a discussion of whether such agencies issue temporary or conditional approvals and a copy of the standard form documentation that the sponsor can consult in such circumstances to confirm compliance with NAC 386.3265 as Attachment 9

See Attachment 9

(g) Documentation demonstrating the governing Body has communicated with the Division of Industrial Relations of the Department of Business and Industry regarding compliance with the federal Occupational Safety and Health Act (OSHA) in compliance with NAC 386.3265 as Attachment 10

See Attachment 10

(5) For schools which are seeking to occupy multiple facilities over several years, please list the number of facilities you project operating in each of the next six years and identify all potential target jurisdictions at the county and municipal levels, including any unincorporated areas.

Reviewers, the following response is applicable for 5a-5b:

LTS-NV is under contract to purchase 10 acres of vacant land in unincorporated Clark County, Nevada at the SEC of Wigwam Road and Montessori Street. On October 4, 2017 the Clark County Board of Commissioners issued final approval to UC-0256-17, a Site Plan and Use Permit application by LTS-NV allowing for the development of a 93,501sf, 2 story educational facility on the 10 acres. The Site Plan and Use Permit approval was a major milestone as it secures the local municipality zoning approvals needed to construct a new charter school by LTS-NV at that specific location.

Subject to final approval of this Charter Application, LTS-NV will close on the 10 acres in April, 2018 with construction to commence by June 2018. As the facility progresses through final building design and the construction permitting process in Clark County; LTS-NV will make all required submittals to the state in accordance to NRS and as it performed on the LTS-North Valley and LTS-Cadence campuses.

(a) Describe the strategy and process for identifying and securing multiple facilities, including any brokers or consultants you are employing to navigate the real estate market, plans for renovations, timelines, bond or third party financing, etc.

(b) Charter school facilities must comply with health and safety requirements and all other mandates prescribed in statute and regulation. In addition, charter schools must be prepared to follow applicable county and municipal review procedures which vary significantly between jurisdictions. Schools are expected demonstrate that they have thoroughly researched the different local requirements and adjust their permitting, construction, and inspection timelines accordingly. Discuss the research and planning that has occurred to date for each of the targeted jurisdictions, including both municipalities and unincorporated areas. Provide documentation of the current inspection and approval processes and

timelines for the state, municipal, or county agencies within your proposed jurisdictions which will issue each Certificate of Occupancy, including a discussion of whether such agencies issue temporary or conditional approvals and a copy of the standard form documentation that the sponsor can consult in such circumstances to confirm compliance with NAC 386.3265 as part of Attachment 8. Provide documentation of building, fire, safety, health and sanitation code compliance inspection and approval processes and timelines for the state, municipal, or county agencies which will conduct all such code inspections within your proposed jurisdictions, including a discussion of whether such agencies issue temporary or conditional approvals and a copy of the standard form documentation that the sponsor can consult in such circumstances to confirm compliance with NAC 386.3265 as part of Attachment 9.

(6) Please include the organization's plans to finance these facilities, including:

- (a) Total project cost for each facility*
- (b) Financing and financing assumptions*
- (c) Total facility costs that the financial model can handle – debt service + lease + maintenance + utilities + etc. for each facility and for the network as a whole*

The estimated project cost for the Southwest Las Vegas campus is between \$22 million and \$24 million. LTS-Nevada plans to secure acquisition, development, and construction financing for the Southwest Las Vegas campus through a commercial loan from The Industrial Development Authority of the City of Phoenix, Arizona. That commercial loan will be funded by tax-exempt bonds underwritten by Piper Jaffray & Co. and sold primarily to large institutional bond investors. This structure and this team has proven itself on multiple transactions with Legacy over approximately five years. This financing includes the cost to equip the campus with furniture, equipment, computers, and curriculum, as well as startup operating capital. The debt service payments and maintenance and utilities costs for the Southwest Las Vegas campus are expected to be covered by the revenues generated by the School.

Ongoing Operations

- (1) *SPCSA schools coordinate emergency management with local authorities. Explain your process to create and maintain the school's Emergency Management Plan required by the State of Nevada. Include the types of security personnel, technology, equipment, and policies that the school will employ. Who will be primarily responsible for this plan? Does the school anticipate contracting with the local school district for school police services? How will the school communicate with and coordinate with lead law enforcement agencies and other public safety agencies?*

Legacy Traditional School-Southwest will create an Emergency Response Plan and Crisis Intervention Procedures with assistance from the EMO. Fire drills, evacuation drills and lockdown drills will be rehearsed on a regular basis. The Legacy Traditional School-Southwest Principal will be responsible for creating and maintaining a School Emergency Management Plan. The Principal will receive Schools Prepared and Ready Together Across Nevada (SPARTAN) training and create a Crisis Response Plan using the SPARTAN web-based program. Identification of security personnel, technology, and equipment will be created in cooperation with local authorities and outlined in the Crisis Response Plan.

Legacy Traditional Schools ("Legacy") uses The Mahoney Group, with offices in Phoenix, Las Vegas, and elsewhere, as its insurance broker for insurance needs for the Legacy schools and includes the followings types of coverage: Package and umbrella liability, Crime, Student Accident, Workers compensation, Indemnity, Directors and Officers and Automobile

- (2) *Discuss the types of insurance coverage the school will secure as a result of the expanded scope of operation and the attendant risks, including a description of the levels of coverage. Types of insurance should include workers' compensation, liability insurance for staff and students, indemnity, directors and officers, automobile, and any others required by Nevada law or regulation. As the minimum coverage required by Nevada law and regulation is intended as a baseline requirement for schools which operate at a significantly smaller scale, schools requesting an amendment are expected to research the levels of and types of insurance coverage typically required of and obtained by multi-site charter school networks in other states, including but not limited to Arizona, California, Colorado, the District of Columbia, Massachusetts, and New York, and crosswalk those levels of coverage with those the school intends to obtain to ensure that the governing body and network leadership is fully cognizant of the complexity of risk management in a multi-site context.*

Legacy Traditional Schools ("Legacy") utilizes the services of The Mahoney Group to provide all lines of insurance coverages for it schools. TMG provides insurance services nationwide and has offices across the Southwest including offices in Las Vegas, Nevada. Legacy carries broad form insurance coverages above and beyond the minimum insurance requirements for Charter Schools in the State of Nevada. Coverages include but are not limited to the following: Commercial Package with expanded liability limits of 1 Mill Occurrence/5 Mill Aggregate, Commercial Property (with equipment breakdown) Automobile, Business Interruption, Umbrella at 10 Mill limits, Crime (including ERISA coverage for benefit plans), Educators Legal Liability, Directors and Officers Liability, Employment Practices Liability, Employee Benefits Liability, Workers Compensation, Student Accident, Volunteer, Abuse & Molestation, Cyber Liability & Data Breach, Emergency Event Management, Course of Construction, Bonding, etc. In addition to these core coverages many extension and broadening forms enhance the underlying coverages. The safety of both staff and students is a top priority for Legacy Schools. Legacy has a keen understanding of risk management involving multiple sites due to current operations in Arizona and takes great pride in being an industry leader in Charter School Risk Management.

Ongoing Operations-Financial Plan

(3) Describe the systems and processes by which the school will manage accounting, purchasing, payroll, and audits. Specify any administrative services expected to be contracted for the school, and describe the criteria and procedures for the selection of contractors and the mechanism by which the board will monitor and hold the contractor responsible for providing such services.

Legacy Traditional Schools – Nevada, Inc. (“Legacy”) has contracted with CFE Management Group, LLC (“CFE”) as its service provider for the accounting, purchasing, payroll, and audits services related to the operation of the School. CFE’s efforts in this area are led by a Chief Financial Officer. A Director of Accounting and a Director of Finance work under the CFO to lead teams to handle these functions. The Director of Accounting leads a team that includes an Assistant Controller, two Accounting Specialists, an Accounting Clerk, an Accounts Payable Supervisor, two Accounts Payable Specialists, a Payroll Manager, and two Payroll Specialists. The Director of Finance leads a team that includes an Internal Audit Manager, a Financial Analyst, a Purchasing Manager, and two Buyers.

Accounting and Record Keeping

CFE establishes and maintains the accounting records, policies and procedures necessary for the management and operation of the School. All such accounting records are the property of Legacy, are safely preserved by CFE on behalf of Legacy, and are available to Legacy at all reasonable times during normal business hours. All financial records including bank statements, cash receipts, deposit receipts, ledgers, journal entries and work files, disbursement logs, reconciliation documentation, billing claims, purchasing documentation, invoices, accounting spreadsheets, travel documentation, and so on will be retained per the Nevada State Library and Records Management Program guidelines.

CFE uses Microsoft Dynamics SL (formerly known as Solomon) as its financial software for the Schools in the Legacy system. The Finance Department is responsible for preparing the filings of annual budgets and presenting them to the Governing Board for approval. CFE prepares financial statements reflecting Legacy’s financial position, operations, and budget vs. actual results on a monthly basis (e.g., balance sheets, income statements). Monthly financials are finalized and communicated to the School and CFE on a monthly basis. Board of Director meetings are held on a monthly basis and financial updates on key financial information and interim financials are closely monitored and reported as well.

CFE prepares all required annual budgets, quarterly, and annual financial reports for approval by the Legacy board and submission to Nevada Department of Education and State Public Charter School Authority. Further, CFE prepares and provides financial and accounting information to external parties as necessary to comply with all financial reporting requirements of government exempt bonds, loans, and lines of credit and as otherwise necessary for the ongoing management and financial needs of Legacy. CFE also prepares and files any paperwork necessary for Legacy to be in good standing with the State of Nevada Corporation Commission, including preparing and filing any annual reports.

CFE prepares disbursements for payments owed by Legacy and shall record and account for those disbursements in the accounting records maintained for Legacy. Legacy receives and deposits cash and checks and provides the information and documentation as may be necessary to enable CFE to record and account for those receipts in the accounting records maintained for Legacy. CFE

establishes a merchant account with a third party credit card processing provider system for receiving credit card payments from parents and other parties, and shall provide training and information necessary for Legacy personnel to be able to receive such payments. Costs of the merchant account and payments processed through it are borne by Legacy.

Under the direction of the Legacy board, CFE establishes and maintains all necessary bank accounts on behalf of Legacy. In addition, if Legacy has a need for operational financing in the form of credit cards and/or revolving lines of credit, CFE may establish such financing with banks or other financial institutions or to make a line of credit available from CFE by separate agreement. All indebtedness, and any fees, costs, and interest associated with credit card, line of credit or other operational financing borne by Legacy.

Purchasing

CFE coordinates on behalf of the School the purchasing of textbooks, supplies, furniture, technology and any other items as necessary for the ongoing operation of the School. The actual cost of the purchases is borne by Legacy. Legacy uses CFE and its purchasing system (Procurify) for its purchases. The School's Principal also has a commercial purchasing card ("P-card") to facilitate making quick, small purchases when necessary.

Payroll

CFE establishes a system for and provides payroll processing to all employees of Legacy through the use of a Human Resource Information System ("HRIS") and a third party national payroll processing firm. CFE provides, implements, and manages Legacy's HRIS. CFE coordinates the payment of payroll taxes, PERS retirement amounts, and all applicable withholdings for federal, state and local purposes. Prior to each payroll date, CFE provides to Legacy a listing of all paychecks to be included on the next payroll date. Legacy reviews that listing for payroll accuracy, reports any errors to CFE, and provides any additional information required to accurately process payroll on a bimonthly basis.

Audits and Taxes

The School's Board of Directors engages an independent external auditing firm on behalf of Legacy to audit the financial statements of Legacy on an annual basis, the cost of which is borne by Legacy. CFE and Legacy cooperate with each other to provide all necessary information to the auditing firm in order to complete the annual audit by the required due dates. Additionally, CFE ensures that all required income, property and sales tax returns are prepared, paid and filed in a timely manner. Fees and taxes for preparation of such tax returns shall be borne by Legacy. The School is exempt from federal and state income taxes under Section 501(c)(3) of the Internal Revenue Code (the "IRC") and similar Nevada provisions. In addition, the School has been classified as an organization other than a private foundation under Section 509(a)(1) of the IRC. Legacy files informational and income tax returns in the U.S. federal jurisdiction and in certain state and local jurisdictions

Internal Audit

CFE provides certain internal audit functions to Legacy, including unannounced visits to the School to monitor and train Legacy personnel related to: cash handling procedures, student attendance records, and other financial matters. The results and findings of those internal audits are communicated to appropriate parties, with significant results and findings being reported to the Board.

(4) *As Attachment 21, present a budget narrative including a detailed description of assumptions and revenue estimates, including but not limited to the basis for revenue projections, staffing levels, and costs. The narrative should specifically address the degree to which the school budget will rely on variable income (e.g., grants, donations, fundraising, etc.). There is no page limit for the budget narrative in Attachment 21. Include the following:*

(a) Per-Pupil Revenue: Use the figures provided in developing your budget assumptions.

(b) Anticipated Funding Sources: Indicate the amount and sources of funds, property or other resources expected to be available through banks, lending institutions, corporations, foundations, grants, etc. Note which are secured and which are anticipated, and include evidence of commitment for any funds on which the school's core operation depends in a clearly identified component of Attachment 10. Please ensure that your narrative specifically references what page this evidence can be found on in the attachment.

(c) Anticipated Expenditures: Detail the personnel and operating costs assumptions that support the financial plan, including references to quotes received and the source of any data provided by existing charter school operators in Nevada or other states.

(d) Discuss in detail the school's contingency plan to meet financial needs if anticipated revenues are not received or are lower than estimated, including both the scenarios identified in subsections e and f.

(e) Year 1 cash flow contingency in the event that state and local revenue projections are not met in advance of opening.

(f) Year 1 cash flow contingency in the event that outside philanthropic revenue projections are not met in advance of opening.

See Attachment 21.

(5) *Submit a completed financial plan for the proposed school as Attachment 22 (the format of this is left to the applicant's discretion but must be clear and sufficiently detailed to permit Authority staff, external reviewers, and the general public to review of all elements of the school's business plan and gauge alignment and consistency with the academic program, operating plan, and budget narrative).*

See Attachment 22.

(6) *Submit, as Attachment 23, a detailed budget for the operator at the network level (the format of this is left to the applicant's discretion but must be clear and sufficiently detailed to permit Authority staff, external reviewers, and the general public to review of all elements of the school's business plan and gauge alignment and consistency with the academic program, operating plan, and budget narrative).*

See Attachment 23.

(7) *Provide, as Attachment 24, historical financial documents for any affiliated CMO from another state or any EMO providing services to the school, including audited financials for each school*

operated by the affiliate as well as any other campus by campus financial evaluations conducted by charter school authorizers. At least three years of school financial audits are required for any school operating for three years or longer. Such financials must be provided as converted PDF documents to ensure accessibility.

See Attachment 24 for:

- Financial Audits of Legacy Traditional Schools for the past three years
- Authorizer Financial Evaluations

(8) Complete the audit data worksheet in Attachment 25. In the info tab, please identify any schools or campuses listed under the student achievement tab for which, pursuant that relevant state's charter law, financial data is consolidated for reporting and auditing purposes in the independent audits provided in Attachment 24.

See Attachment 25.

(9) Provide a six-year development plan that addresses the annual and cumulative fundraising need at the network and school levels including a description of the staff devoted to development. The plan should include a history of the school's fundraising outcomes and identify funds that have already been committed toward fundraising goals. The plan should also identify the role of the members of the board, particularly as relates to give/get requirements, and should demonstrate alignment with the expectations for board members discussed elsewhere in the amendment request. If funds are raised at a partner organization level, describe the methodology to be used in allocating funds to the school and the proposed campuses. If the school has not raised any funds to support its programming to date and the budget does not include any fundraising activity, please explain that this question is not applicable to your school.

Because the school has not raised any funds to support its programming to date and the budget does not include any significant fundraising activity, this question is not applicable. However, we anticipate some local fundraising efforts with corporations, granting organizations, and general unrestricted contributions from the local residents on an ad hoc basis. The majority of School revenues are received from the State of Nevada as DSA funding. Historically at a Legacy network level, fundraising activities and outcomes have not been a major source of revenues for the Schools.

(10) Describe the campus', schools, and any management organization's distinct responsibilities in the financial management and oversight of the proposed campuses, including, but not limited to, their respective roles in overseeing or implementing internal controls and in making financial management decisions including budget development. Detail the process and frequency by which key financial information is communicated to and reviewed by the various organizations and different levels of leadership and governance.

CFE will provide accounting and financial services for the School, including purchasing, payroll, coordination of external audits, and internal auditing. The School will pay the costs for all services, e.g., third-party credit card processing, external auditor, third-party payroll processing. Accounting records will be the property of the School and available to the School during business hours, but will be safely preserved by CFE. CFE will retain all financial records per the guidelines of the Nevada State Library and Records Management Program. The School and CFE will set internal controls consistent with best practices in the industry, as at the existing Legacy schools. These controls

include knowledgeable and experienced professionals (e.g., licensed CPAs) on CFE's accounting and finance staff, proper segregation of duties, timely reconciliation of all significant balance sheet accounts, and regular review and monitoring of monthly financial statements. CFE will train School personnel in procedures to handle cash, attendance records, etc., and will monitor in part via unannounced visits to the School. The results and findings of those internal audit functions will be communicated to the School, and significant results and findings will be reported to the board. The School and CFE are already building their understanding of the requirements for public schools in Nevada. The Legacy schools, with CFE, have successfully adhered to Arizona's accounting, auditing and reporting procedures, and will do the same in Nevada. Auditors have never found any issues with internal financial controls at any Legacy school, and bond issuers have always approved schools' internal controls after rigorous investigation.

The board will receive financial statements monthly from CFE's accounting & finance department. The board will select and retain an independent auditor, who will be a certified public accountant licensed by the Nevada State Board of Accountancy. The board will have the sole authority to select the auditor, and the auditor will report to the board, not to school or CFE staff. Also, the School will retain an auditor who is different from the auditors used by other Legacy school boards and CFE.

(End)