

Winter Cycle 2017 Charter Application Review

New America School- Las Vegas

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Summary of Application Section Ratings

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

- Executive Summary
 - Does Not Meet the Standard
- Meeting the Need
 - Approaches the Standard
- Targeted Plan
 - Approaches the Standard
- Parent and Community Involvement
 - Does not Meet the Standard
- Academic Plan
 - Does Not Meet the Standard
- Mission and Vision
 - Approaches the Standard
- Transformational Change
 - Approaches the Standard
- Curriculum & Instructional Design
 - Approaches the Standard
- Distance Education Requirements
 - N/A
- Pre-K Requirements
 - N/A
- High School Graduation Requirements
 - Does not Meet the Standard
- Driving for Results
 - Approaches the Standard
- At Risk Students and Special Populations
 - Does not Meet the Standard

- School Structure (Culture)
 - Does not Meet the Standard
- School Structure (Student Discipline)
 - Does Not Meet the Standard
- School Structure (Calendar and Schedule)
 - Does not Meet the Standard
- A Day in the Life & Scenarios
 - Does not Meet the Standard
- Operations Plan
 - Does not Meet the Standard
- Leadership Team
 - Does not Meet the Standard
- Leadership for Expansion (Experienced Operators Only)
 - Does not Meet the Standard
- Staffing
 - Does not Meet the Standard
- Human Resources
 - Does not Meet the Standard
- Scale Strategy (Experienced Operators Only)
 - Approaches the Standard
- Student Recruitment and Enrollment
 - Does not Meet the Standard
- Board Governance
 - Does not Meet the Standard
- Incubation Year Development
 - Does not Meet the Standard
- EMO Relationships and School Management Contracts (If Applicable)
 - Does not Meet the Standard
- Services
 - Approaches the Standard

- Facilities
 - Approaches the Standard
- Ongoing Operations
 - Approaches the Standard
- Financial Plan
 - Approaches the Standard

Application Overview

School Name & Proposed Governance Structure

New America School-Las Vegas (NAS) is an applicant that plans to partner with the New America School Network, a 501(c)(3) nonprofit educational management organization, to assist in accomplishing the mission and vision of the school. Several key leadership functions, such as the school business manager, will be filled by a second educational management organization, schoolAbility (sic).

Mission (Application Item A .1 .2)

The mission of the New America School-Las Vegas is to empower new immigrants, English Language Learners and academically underserved students with the educational tools and support they need to maximize their potential, succeed, and live the American dream. NAS-Las Vegas will embrace student diversity; develop the skills students need to make responsible choices; teach the 21st century skills students need to succeed academically, personally, and professionally; empower students with the knowledge and confidence necessary to transfer academic knowledge to the real world; and provide English language competency to ensure student success.

Proposed Location (from Charter Application Cover Sheet)

The school is proposing to locate in Las Vegas, NV in Clark County. A specific location was not identified by the applicant.

Enrollment Projections (from the Charter Application Cover Sheet)

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
K						
1						
2						
3						
4						
5						
6						
7						
8						
9	40	50	60	75	85	100
10	40	55	65	80	95	105
11	50	60	70	80	90	110
12	55	60	80	90	105	110
TOTAL	185	225	275	325	375	425

Overview

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

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

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

Recommendation

Overall Recommendation

Recommendation to Deny - Reviewers rate the overall application as “Does Not Meet the Standard.”

The Agency determined that The New America School – Las Vegas “Does Not Meet the Standard” in the majority of areas in the initial application process. For applicants seeking to replicate an existing model—whether as a direct charter management organization applicant, a committee to form partnering with a non-profit or for-profit education management organization, or a committee to form which seeks to independently replicate, primary consideration must be given to the academic track record of the model along with the organizational and financial track record of the operator.

Academic Performance:

In the academic plan section, some of the noteworthy deficiencies were as follows: merit of the proposed programming and the likelihood it would be successful in supporting strong growth gains with at-risk populations, lack of college and career readiness metrics, lack of evidence that demonstrated the applicant understood Nevada graduation requirements, and few details regarding the student discipline policies and protocols.

Most importantly, the academic model selected by the applicant does not have a strong track record of success. Based on recent performance, two of the operator’s three schools in Colorado received only short-term renewals from their authorizer, the Colorado Charter Schools Institute (Colorado CSI), on December 13, 2016. The terms of these renewals can be found in the Colorado CSI Board for that date (see Colorado CSI Board minutes—external link—at

[http://www.boarddocs.com/co/csi/Board.nsf/files/AHR7H919A9C0/\\$file/Agenda%20Item%20VI.a.i.%2012-13-16%20Board%20Meeting%20Minutes%20FINAL%20APPROVED%201-10-17.pdf](http://www.boarddocs.com/co/csi/Board.nsf/files/AHR7H919A9C0/$file/Agenda%20Item%20VI.a.i.%2012-13-16%20Board%20Meeting%20Minutes%20FINAL%20APPROVED%201-10-17.pdf)). Based

on Colorado CSI staff’s recommendation, the Colorado CSI Board voted to grant New America School-Thornton a one year (see Colorado CSI Staff Recommendation for Thornton—external link—at https://drive.google.com/open?id=1JwZDs5BCnjOY-9-WQbWHWtv_Nq0uzr_ro and see Renewal Resolution for Thornton—external link--at

[http://www.boarddocs.com/co/csi/Board.nsf/files/AGL4WY0D9C78/\\$file/Agenda%20Item%20VI.o.%20New%20America%20School%20Thornton%20Renewal%20Application%20%20RESOLUTION%201619-Revised%2012-12-16.pdf](http://www.boarddocs.com/co/csi/Board.nsf/files/AGL4WY0D9C78/$file/Agenda%20Item%20VI.o.%20New%20America%20School%20Thornton%20Renewal%20Application%20%20RESOLUTION%201619-Revised%2012-12-16.pdf)). While Thornton demonstrated sufficient progress to merit an

additional two year short-term renewal, which was granted by Colorado CSI at its November 14, 2017 Board meeting based on staff recommendation. (See Renewal Resolution for Thornton—external link—at

[https://www.boarddocs.com/co/csi/Board.nsf/files/AT3KF55199E4/\\$file/Agenda%20Item%20VI.ii.%20NAS-Thornton%20Renewal%20Application%20-%20RESOLUTION%201736.pdf](https://www.boarddocs.com/co/csi/Board.nsf/files/AT3KF55199E4/$file/Agenda%20Item%20VI.ii.%20NAS-Thornton%20Renewal%20Application%20-%20RESOLUTION%201736.pdf) and see Staff

Recommendation for Thornton—external link--at

[https://www.boarddocs.com/co/csi/Board.nsf/files/AT3KF7519B87/\\$file/Agenda%20Item%20VI.ii.%20NAS%20-%20Thornton%20Renewal%20Application%20-%20RESOLUTION%201736%20-](https://www.boarddocs.com/co/csi/Board.nsf/files/AT3KF7519B87/$file/Agenda%20Item%20VI.ii.%20NAS%20-%20Thornton%20Renewal%20Application%20-%20RESOLUTION%201736%20-)

[%20STAFF%20RECOMMENDATION.pdf](#).

Similarly, Colorado CSI's staff recommended and their board approved a two year renewal of the New America School—Lowry in December 2016; that school's potential renewal will be considered in approximately one year (see Colorado CSI Staff Recommendation for Lowry—external link—at <https://drive.google.com/open?id=1sb7J6k-2gKb5WaGnrMHRHZy7hoTiHTS> and see Renewal Resolution for Lowry—external link—at [http://www.boarddocs.com/co/csi/Board.nsf/files/AGL4WQ0D9303/\\$file/Agenda%20Item%20VI.n.%20New%20America%20School-Lowry%20Renewal%20Application%20%20RESOLUTION%201618-Revised%2012-12-16.pdf](http://www.boarddocs.com/co/csi/Board.nsf/files/AGL4WQ0D9303/$file/Agenda%20Item%20VI.n.%20New%20America%20School-Lowry%20Renewal%20Application%20%20RESOLUTION%201618-Revised%2012-12-16.pdf)).

Under the regulations adopted by the Colorado State Board of Education, a charter school which has performed at either of the two lowest levels of performance on the state's academic performance framework (the Priority Improvement or Turnaround Improvement levels) for five consecutive rating years must either have its board restructured (a process similar to reconstitution or restart under Nevada law and regulation) or it must have its charter revoked and the school must be closed. See CCR-301-1 rule 10.12(A)(2) (page 45 of external link <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=6919>) and CCR-301-1 rule 10.12(A)(5) (page 46 of external link <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=6919>).

In the case of Thornton, the Colorado CSI determined that the school was rated in the second lowest category of school performance, Priority Improvement, for five consecutive rated years under the Colorado Department of Education's School Performance Framework for Alternative Education Campus Schools in 2016. In the case of NAS Lowry, the sponsor determined the school was rated in the Priority Improvement Level for three out of the past five rating years. Both schools are currently rated at the Improvement Level.

It is important to note that there is one older New America School, NAS-Lakewood, which is authorized by the suburban Jefferson County School District and was initially approved in 2006. That school was granted a five year renewal by its authorizer in 2016, despite being ranked "Priority Improvement" by the Colorado Department of Education during each of the previous five years (see Jefferson County staff recommendation—external link—at [https://www.boarddocs.com/co/jeffco/Board.nsf/files/A6MQ7267DA93/\\$file/Consent%20Agenda%20Exec_Summary%20-%20New%20America%20School%202016.pdf](https://www.boarddocs.com/co/jeffco/Board.nsf/files/A6MQ7267DA93/$file/Consent%20Agenda%20Exec_Summary%20-%20New%20America%20School%202016.pdf), see renewal resolution—external link—at [https://www.boarddocs.com/co/jeffco/Board.nsf/files/A6MQ7767DD4D/\\$file/Renewal%20Resolution%20New%20America%20School%202016.pdf](https://www.boarddocs.com/co/jeffco/Board.nsf/files/A6MQ7767DD4D/$file/Renewal%20Resolution%20New%20America%20School%202016.pdf), and see item 6 of the approved minutes—external link—at http://www.jeffcopublicschools.org/UserFiles/Servers/Server_627881/File/Jeffco%20PS/About%20Jeffco/Board%20of%20Education/Board%20Meeting%20Minutes/Board%20Minutes%202016/offmin020416.pdf).

Notwithstanding that renewal by the Jefferson County School District, NAS-Lakewood's weak academic performance means that it remains subject to the state's accountability clock and it will have

to close following a revocation or be subjected to a dramatic reorganization of governance and operations if it continues to persistently underperform.

While the most recent data from Colorado indicates that both CSI-authorized schools saw upswings in performance following these short term renewals, one year of improvement does not constitute a trend and the Authority cannot conclude that this applicant meets the approval criteria set forth in R089-16A(7)(j) (see page 6 of <https://www.leg.state.nv.us/Register/2016Register/R089-16A.pdf#page=6>), as the applicant has not demonstrated the capacity to “[a]ssure that pupils enrolled in the proposed charter school will meet the same performance standards and assessment requirements for pupils in other public schools.” Furthermore, this poor track record of performance also demonstrates that the applicant has failed to prove that the education management organization has effectively achieved academic goals for the category or categories of students that the proposed charter school seeks to serve. Indeed, page 7 of Colorado CSI’s own November 2017 recommendation report for the NAS Thornton renewal provides important contextual data on the performance of the NAS schools versus statewide:

- In a bar graph displaying the percent of points earned on the Colorado School Performance Framework designed for alternative schools, the Thornton school is ranked the 75th lowest out of 87 alternative education district and charter schools (AECs).
- On the same graph, the Lowry school is ranked the 72nd lowest out of 87 alternative education district and charter schools (AECs) in the state of on the Colorado School Performance Framework for AECs.
- One the same graph, the Lakewood school, which is also included in this statewide, authorizer-agnostic summary by the CSI staff, is ranked the 52nd lowest out of 87 alternative education district and charter schools (AECs) in the state of on the Colorado School Performance Framework for AECs.

The NAS Network schools in New Mexico demonstrate similar levels of underperformance. NAS-New Mexico, located in Albuquerque, has been in existence for over a decade. Over the past four years, the Albuquerque campus has never had a school grade higher than a D, earning that grade in 2014, 2016, and 2017 and receiving an F grade in 2015. The network’s Las Cruces client has performed slightly better, earning C grades in 2014, 2015, and 2016. The school’s 2016 renewal was predicated on the condition that the school increase its letter grade, but the school’s performance actually declined to a D grade in 2017.

Conclusion: The proposed academic does not have a track record of high quality academic performance in other states.

Organizational and Financial Performance:

The Committee to Form, as identified in the application, includes members (Mason, Garcia, Corbett, Corbin, Lyons, Ruffles, and Flores). These individuals are only identified in the attachments and were not reflected at the front of the application in the cover sheet or in the core charter application. Instead, the proposed board members, who are committing their time, reputations, and expertise to this endeavor, were relegated by the EMO to an appendix at the back of the application. Additionally, it

became clear in the capacity interview that not all these individuals are independent of the EMO. Further, only one independent local board member was present at the capacity interview and it was unclear why more local members did not attend the interview. While the resumes and other materials submitted by the proposed board indicate significant community ties and local educational and governance expertise, the failure of the educational management organization to provide these individuals with sufficient information to know that their presence was expected at the capacity interview represents a serious and irredeemable deficiency that cannot be remedied absent an entirely new application and interview by those qualified independent individuals who wish to serve on the governing body of a future charter school.

In the organizational section, the noteworthy deficiencies included the lack of work done in the community to generate support for the school, a staffing model that did not seem reasonable given the expected student population, and a school calendar that ensured that students would be able to meet graduation requirements. Most notably, the applicant is not eligible for approval from the State Public Charter School Authority or any other Nevada sponsor, as the Committee to Form contains representatives of an educational management organization. At least one member of the committee to form was a member of the board of the EMO at the time of application and during the capacity interview. This is a violation of NAC 386.345, which precludes the membership of any vendor on the governing body of a charter school, and NAC 386.130, which prohibits a sponsor from acting any application which includes a person who is a potential contractor or a representative of an educational management organization.

Beyond this immediate area of concern, it is important to note that a review of the findings of other authorizers of NAS schools indicate areas on organizational disarray which are consistent with areas of concern identified in the review of this application. Notably, the Las Cruces NAS school's renewal was predicated on conditions related to corrective actions in the areas of special education and ELL services, ensuring that all students receive sufficient instructional time to earn the credits necessary to graduate, counseling and student academic planning, and the implementation of an appropriate response to intervention program to assist students experiencing academic challenges and those who are a referral path to special education. The 2016 renewal of NAS-Thornton by Colorado CSI highlighted the school's failure, despite a prior citation in a previous renewal, to adopt financial policies and procedures consistent with federal requirements while the Lowry renewal raised a similar concern for the first time. Consequently, the authorizer made substantial revisions to the financial policies and procedures for both schools a condition that had to be satisfied prior to execution of the new charter contracts.

The fact that several of the concerns flagged by the Agency during its initial application review, which occurred prior to the initiation of the due diligence phase, have manifested in other geographies is concerning, as it raises the risk that an approval of an NAS school in Nevada would not yield minor, isolated issues of organizational error that are readily addressed and rarely, if ever, recur, but rather a pattern of non-compliance and organizational ineffectiveness.

In the financial plan, the noteworthy areas of concern included serious questions about the school having a feasible budget and appropriate contingency plans, questions about a strong fundraising plan

in both year one and beyond, and the reasonableness of the proposed salaries for both teachers and school leadership. Additionally, the budget narrative provided by the applicant was insufficiently detailed to evaluate how realistic or reasonable the assumptions provided were. Finally, the application writer omitted a number of key financial indicators from the applicant data sheet required of all applicants.

Conclusion: The proposed model does not have a track record of high quality organizational performance in other states. The financial performance of NAS schools appears to be mixed, with several areas that are trending downwards or fluctuating based on the analysis of other authorizers, but the omission of several key performance indicators from the applicant data sheet limits the ability to draw conclusions from across the operator's portfolio.

Throughout this application, there were many key areas that lacked detail, such as the academic program and governance plan. SPCSA staff feels strongly that these areas, as outlined above and throughout this memo, need to be addressed in order to gain a positive recommendation.

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

Rating Standards

Meets the Standard

The response reflects a thorough understanding of key issues. It addresses the topic with specific and accurate information that shows thorough preparation; presents a clear, realistic picture of how the school expects to operate; and inspires confidence in the applicant's capacity to carry out the plan effectively in a way which will result in a 4 or 5 star school.

Approaches the Standard

The response meets the criteria in many respects, but lacks detail and/or requires additional information in one or more areas.

Does Not Meet the Standard

The response is undeveloped or incomplete; demonstrates lack of preparation; or otherwise raises substantial concerns about the viability of the plan or the applicant's ability to carry it out.

Executive Summary

Does Not Meet the Standard

Areas of Strength:

- The founding team determined the applicant team has a sincere commitment to the mission and vision for the school; specifically the intent to serve a normally underserved population of students that include high school English Language Learners and academically challenged students who may be under-credited or may need adaptive hours to attend school. They articulated their intent to open a school that includes a full immersion program, project-based learning and scaffolding to assure differentiation in the classroom. The applicant envisions a flexible 4-day school schedule for students, with day and night classes offered so students are able to attend school at times that align with their work or parenting schedules ([page 3](#)).
- It is the intent of the school to hire teachers who are not only certified and highly qualified but the school will also require teachers are ESL certified. A school leader, though not identified in the application, will have the support of the NAS network for ongoing coaching and support ([page 4](#)).
- The discussion of the target population was specific ([page 2](#)) and the applicant attempted to articulate academic goals that would be relevant to serving this specific student demographic.

Areas of Concern:

- The summary of the academic model was very generic and did not contain specific details demonstrating alignment with the mission and vision. For example, the mission is very specific to ELLs and academically underserved students, but the discussion of the academic model does not include a single academic practice that is targeted toward either group ([Executive Summary page 1-2](#)).
- The executive summary did not provide any specific academic goals other than providing students with the education tools to maximize their potential to succeed and live the American dream. Mission statements can be used as a data point to determine the overall success of a school, but this proposed mission makes that difficult. It is unclear how individual students would define their American dream. Though the school intends to be a 21st Century skills-based school, there were no rigorous measurable outcomes provided in the summary. In some cases the goals in the summary appear minimal. School walkthroughs would be used as a source to gauge curriculum alignment but it does not seem feasible that a simple walkthrough can actually provide this level of oversight ([pages 2 and 3](#)).
- Based on the intended population, the application does not provide the benefit of the program for students with disabilities. Further, during the capacity interview the founding team could not clearly articulate how this group of students would be best served by this school. The founding team leaned heavily on differentiation or scaffolding but did not provide any evidence of what

differentiation or scaffolding is, other than stating teachers would be given professional development in relation to identifying students in need of services. The founding team could not present a compelling description of the possible needs of students who may attend the school ([page 3](#)).

- While the flexible schedule for students is innovative, the applicant team, was unable to fully articulate how the school would monitor the needs of the students and to ensure students attend classes they need to attend to graduate during the capacity interview. The applicants did not provide a reasonable explanation regarding how the school would be staffed to accommodate the modified school hours ([page 3](#)).
- The executive summary lacked, with the exception of one person, community support information. Additionally, during the capacity interview the founding team acknowledged they had not done significant outreach. Based on their prior application they do believe, however, they will be able to reach their target group through radio ads and advertisements. There was a significant lack of detail and buy-in for parent engagement, key supporters, partners and resources that will contribute to the school's success identified in the application ([page 4](#)).
- The school leadership will not be hired until the application is approved. The school leader, along with the coaches from the EMO, will hire teachers who are dedicated to the mission and vision of the school. It was unclear during the capacity interview how the school would hire teachers that cover the school day model provided in the application. Specifically, there was confusion among the reviewers about the scheduling of teachers in relation to the flexible schedule to meet the needs of all students. This is especially concerning given the very specific model of the school ([page 4](#)). To the degree that the postponement of school leadership selection is a common practice with this operator, it may explain some of the persistent underperformance issues.

Meeting the Need

Approaches the Standard

Areas of Strength:

- The application's discussion of the target community was very specific, both with respect to geography and educationally disadvantaged status. The application was very clear that the Applicant was seeking to serve students of specific ages, educational experiences, ELL proficiency levels, and immigration statuses ([pages 5-6](#)).
- The model included a number of specific elements that seek to support overage/under-credited students including explicit mid-year enrollment plans, quarterly crediting, a 14-hour flexible schedule, four day school week with Friday intervention schedules, significant ESL class time and specific teacher supports including PLCs and monthly full day PD ([page 10](#)).
- Features of the proposed educational model included clear connections to how they would serve the target population ([page 7](#)). For example, it is clear the newcomer ESL program would be beneficial to new immigrants, or how a quarterly credit-earning system would help under-credited students.
- The applicant included a clear plan to engage parents in the life of the school, including research-driven strategies to build trust with parents who are historically involved. The strategies were specific to the target population, particularly students from families where parents may not speak English ([page 9](#)).
- The plan for family engagement was aligned to the target population and took into consideration the language barriers that may face the families of their students and proposed specific strategies for overcoming them ([page 12](#)).

Areas of Concern:

- The applicant provided a chart of the current population for the EMO supported schools in Colorado and New Mexico. However, based on the zip code analysis of the Las Vegas area, the proposed school demographics do not significantly match the current EMO schools; in fact, close to half the population within those Las Vegas zip codes are English speaking households.
- The application stated 3.6% of the Hispanic population dropped out of school in Las Vegas but provided no solid number of how many students that actually may be (or an average of). The applicant further stated, *"it is quite possible language barriers could be a big factor in contributing to the high number of dropouts...."* but "quite possible" is not actual evidence that language was the reason for the dropout rate. Speculation is not reasonable grounds for a conclusion that the specific programmatic elements proposed for this school will be sufficient to meet student needs and ensure that the students served by this school will reach the state's academic targets. Because a household speaks Spanish does not immediately classify possible

students as English Language Learners and in many cases those students may be bilingual ([pages 5 and 6](#)). Assuming that all students with a home language other than English are English Language Learners is inappropriate.

- Throughout the “Meeting the Need” section the applicant leaned heavily on the information and model they use for the other schools in the EMO network rather than a significant emphasis or information based on data about the possible population of the proposed Las Vegas school. The applicant failed to demonstrate how it would meet the need of this application’s proposed population.
- The model that NAS proposes is based on the program of the Colorado and New Mexico charter schools and assumes that the national support organization will serve in a contractual, advisory capacity providing support offerings. Instead of providing a coherent management model, the applicant proposes that the network staff serve in a consulting capacity, rather than a fully operating, and functioning, EMO-managed or direct CMO-governed and operated school. The founding team could not speak to how this model would work in Las Vegas, but rather continually went back to the current schools operating in New Mexico and Colorado. Rather than be reflective of the new school, the group relied heavily on the data and perspectives of their other schools. Given the documented performance issues with the existing schools in the network, this reliance on the practices of those schools represents a failure by the Committee to Form to design a program that meets the needs of Nevada’s most vulnerable students.
- The motive for expanding to Nevada is not clear. The applicant stated in the proposal, and implied in the interview, that the proposal is driven by the local board. However, no compelling evidence was presented to support this claim.
- The applicant lacked compelling data that demonstrated the proposed model would meet the community academic needs and the only data points cited were graduation and drop-out rates, which are certainly important, but not themselves enough to demonstrate need. There was no information about the academic proficiency and growth of area schools serving similar populations ([pages 5-6](#)).
- The application stated that “data from the 2014-15 school year illustrates [for] the great need in Nevada and the Clark County School District in particular for a school that services this community,” but the only data presented about the school population is the percentage of Hispanic students and this is insufficient to justify the stated claim. There was no data presented about ELL students, or even the graduation/dropout data for ELL students ([pages 5-7](#)).
- The application provided no evidence, information, or plans in regard to parent, neighborhood or community development until they receive the charter. During the capacity interview, the founding team acknowledged they had not done the same level of work they had provided in the prior 2012 application (when the application was originally approved). The applicant team did express their intent to do the heavy lifting in this area once the application is approved.
- The applicant provided a number of descriptions such as, “discuss resources”, “challenge”, vast

array of services available”, “conduct surveys” but did not provide definitive plans on what engagement actually will look like or how it will be implemented ([page 9](#)). The applicant relied on groups that had supported the application that was approved in 2012 as an engagement plan and the applicant provided no letters of support for this current application ([page 9](#)).

- The proposal lacked specificity and evidence of work done with the community, and did not articulate a plan to engage to engage parents, neighborhood partners and other constituents. This was especially concerning because it is not known whether the supporters of the original application were still intact ([page 11](#)). Any successful charter school must be able to demonstrate the support of the community. Instead, the Applicant stated that it will engage in a marketing plan to “raise awareness of the school and who it will serve.” There is a big difference between authentic community engagement that organically translates into support and investment, and a marketing campaign that announces the school’s presence in the community ([pages 8-9](#)).
- There were no specific partnerships secured in the parent and community involvement section, but rather descriptions of what could be once the charter was given. There were no measurable goals or outcomes, time specific or otherwise, presented in the application. For a school that will rely heavily on outside resources for recruitment of students, the applicant provided no substantive information that gave the review committee confidence that the school had sufficient recruitment plans and could meet enrollment goals.
- The applicant attempted to amend its application by soliciting and furnishing boilerplate letters of support from a number of respected community members and organizations after it was originally submitted. It is unclear that the community members approached by the applicant were informed of the persistent underperformance of other schools within other jurisdictions and the possibility that two of the five extant schools were in danger of having their charters revoked on non-renewed at the time that the Committee to Form was developing this application.

Academic Plan

Does Not Meet the Standard

Summary

The Committee to Form has articulated a vision where NAS will embrace student diversity, develop the skills students need to make responsible choices, teach the 21st century skills students need to succeed academically, personally, and professionally, empower students with the knowledge and confidence necessary to transfer academic knowledge to the real world; and provide English language competency to assure student success. The mission of The New America School-Las Vegas (NAS-Las Vegas; NAS-LV) is to empower immigrants, English Language Learners and academically underserved students with the educational tools and support they need to maximize their potential, succeed, and live the American dream.

Areas of Strength:

- The mission and vision for the school is focused on serving a normally underserved population of students that include high school English Language Learners and academically challenged students who may be under credited or may need adaptive hours to attend school. The intent is to open a school that includes a full immersion program, project-based learning and scaffolding to assure differentiation in the classroom. A flexible 4-day school schedule is available to students, with day and night classes offered so students are able to attend school at times that align with their work or parenting schedules. This aligns with each of the statutory purposes for Nevada charter schools ([page 14-17](#)). Furthermore, the proposal includes a clear and specific definition of “at-risk” which expands beyond traditional classifications ([page 41](#)).
- The school will focus on immigrants and students who may have dropped out of high school and the philosophy of the program is to “meet students where they are” to provide the students with the resources they need to receive their diploma. This is an important demographic of students that not many charter school applicants are uniquely prepared to serve.
- The program includes a number of indicators to help guide their student program including MAP, ACCESS, behavior rate, credit accrual, community service, attendance, and WorkKeys to ensure students are on track for graduation. Because the program is so specific the application includes a number of professional opportunities for teachers that include training in Model Performance Indicators, Accommodations, Sustained Silent Reading, Guided Instruction and Practice, Interactive Learning, Formative Assessments and Sheltered Instruction Observation Protocol. These professional development opportunities indicate that the applicant has plans to adequately cultivate the abilities of each hired teacher to serve their student population.
- The applicant proposes an outline for the curriculum that covers all Nevada Academic State Content Standards with an emphasis on English Language Acquisition that aligns to the mission of the school.

- Electives include options aimed at supporting students beyond graduation (i.e. Personal Finance, Public Speaking) [\(page 22\)](#). Some specific teaching practices to support the proposed student body were named including SIOP, scaffolding, active learning, and PBL [\(page 24-25\)](#).
- The description of how the curriculum would drive the development of knowledge and skills that would translate into career and college readiness – such as the development of critical thinking and inquiry skills, along with opportunities to learn and practice the softer skills of public speaking and teamwork [\(page 28\)](#).
- Instructional strategies seem to be well suited to the target student population, and would maintain the rigor of an academic program meeting Nevada state standards. For example, in the discussion of scaffolding, it is clearly explained how the practice would work, and it is easy to make the conclusion that it would be beneficial to students who may be entering the school many grade levels behind or working to understand the material through the lens of a second language [\(pages 20-22\)](#).
- The application includes a clear description of potential strategies for remediation for students in need of additional support, including small group and individual tutoring, retention at current grade levels, or counseling for issues arising outside the classroom [\(page 23\)](#). Additionally, the description of the Response to Intervention (RtI) model includes clear and appropriate delineation of services and students to be served at each level [\(pages 38-39\)](#), and includes specific estimations of students in each Tier (50% in tier 1, 35% in tier 2 and 15% in tier 3) although the basis for these estimations is not described [\(page 42\)](#).
- The application suggests an understanding of the obligation to participate in all required statewide and federal tests. The proposal includes specific estimations of students in each Tier (50% in tier 1, 35% in tier 2 and 15% in tier 3) although the basis for these estimations is not described [\(page 42\)](#).
- There are internal goals for end-of-course test results, which indicate that the applicant has an understanding of the mandatory tests [\(pages 34-35\)](#).
- The application provides a clear and detailed description of the due process plan for students [\(pages 49-50\)](#).
- The application articulates, SMART goals for interim assessments, with academic gains to be assessed through NWEA MAP testing and multiple student culture indicators, including credit attainment data, disciplinary data, attendance, and graduation rate data. The interim assessment goals are aligned to the school's mission. Internal and mission-specific goals are SMART, and the application includes clear processes for collecting, reviewing, and utilizing the data to drive internal improvements in instruction. It is clear from the application how the goals allow for the evaluation of mission attainment, teaching and learning efficacy, and program design adjustment. All of this provides ample evidence that the applicant understands and is capable to monitor student progress throughout the year [\(pages 30-33\)](#).

Areas of Concern:

New America Schools Relationship/EMO

- The NAS Network does not have a strong track record of success in other states. Pursuant to NAC 386.604(6)(c), the applicant has failed to demonstrate that the education management organization has successfully managed school functions and achieved academic goals.
- The application did not provide sufficient evidence of valid research or compelling evidence of success in schools implementing similar programs serving similar target populations and the only evidence provided was from other NAS schools which were too general to derive an informed conclusion about the potential of the model to deliver double-digit gains as asked by the SPCSA. For example, “NAS students’ average greater growth than similar students at other schools” – this doesn’t describe how well the NAS students actually performed. Performing better than low-performing students does not equate to a high level of performance ([pages 16-18](#)). Additionally, given the documented low level of performance of several of the New America schools in other states, the evidence provided appears to cherry pick data to craft a narrative of success that is not reflective of reality. The application did not discuss how NAS would drive growth among students at all achievement levels especially the achievement of those pupils who are most behind. The applicant only discussed MAP testing and the evaluation of student data and not how the school would act upon data of under-performance and translate that it into achievement ([page 18](#)).
- The applicant stated that teachers will work with NAS Network staff to become well-versed in understanding school and student level results. However, this is in direct contrast to other portions of the application where the EMO will not “own” any academic outcomes. The applicant did not sufficiently demonstrate a clear role for the proposed EMO, in relation to data collection and network wide reporting ([page 40](#)) information.
- The applicant did not propose a specific curriculum. If the EMO schools were working as well as stated throughout the application, it should stand to reason this school may use the same curriculum. The application also lacked specific details about the curriculum providing the opportunities needed to support students at risk or special education students. Until a curriculum is determined, it is difficult to ensure all students will be able to thrive in this academic environment.
- There wasn’t information on the role of the EMO in relation to the curriculum and outcomes in as required on ([page 22](#)) of the application in regard to student academic support resources. If the EMO is currently providing these resources to their schools in Colorado and New Mexico, there should be a clear list of roles and responsibilities required of the EMO. The role of the EMO for this school appears to be based on coaching rather than specific resources and this raised the concern of the benefit of working with this EMO and the value of the services provided for the proposed cost.
- The application failed to provide convincing evidence that the EMO has a demonstrated track

record of success serving a wide range of students with disabilities. The application stated the EMO superintendent has extensive experience with schools, including special education and while that may be true, there was no information provided about whether, and how, the superintendent's work with special needs students was successful. Further, there was no evidence provided from the existing EMO schools to demonstrate that the model is serving students with disabilities effectively ([page 41](#)).

- It was troubling that an established operator with five functioning schools and one previously approved school in Nevada would not have its curricular choices in place ([page 21](#)).

Mission, Vision, and Theory of Change

- The mission of the school is difficult to measure because the American Dream can be defined differently among individuals. Since the mission statement is so vague it did not provide any evidence of high academic standards or student's success.
- The vision of the school as written on [page 11](#) provided very little detail for long term goals or determination of what a success looks like for students and teachers. It was difficult for the review team to determine what 21st century learning looks like for this committee to form and how the program will impact the community. The applicant failed to provide a comprehensive explanation of what EMO, the school staff, and board determine to be a successful school.
- The vision statement did not provide a clear, tangible description of what the school would look like when it is achieving its mission— e.g., “teach the 21st century skills students need to succeed academically, personally, and professionally.” These are very broad and could apply to any school with any population in Nevada ([page 11](#)).
- No real theory of change was stated and the proposal did not build a clear case for the need of this specific program that is based on factual evidence within Las Vegas. Even during the interview, the applicant was unable to identify clear and specific educational strategies aligned to the mission which would be critical to the schools' success. A theory of change should be a discussion of inputs and the outputs that would result. The statement provided in the application only speaks to the inputs, which did not explain how students would experience and practice academic rigor ([pages 14-15](#)).
- A strong school culture is normally an indicator for a successful school. The applicant did not create a clear path forward that addressed these specific students and their specific needs. Rather the Applicant only provided the minimum amount of explanation to receive the charter. The applicant used phrases such as, “will develop,” “will deliver the message,” “will create,” and “will reflect” but this does little to show what the comprehensive plans are how any of these things will be accomplished. The NAS program was touted by the Applicant as successful in other states, but the program as written in this application did not demonstrate a cohesive academic plan that would lead to student success.
- The first scenario did not fully align with the key priorities and principles shared in the academic plan and overall mission and vision for the school, as there was no indication that the

student fits into the target population. The entire program is based on knowing where a student is and providing a plan based on that, and the response that a student would be self-motivated and feel comfortable admitting they do not know something infers a strong school culture that was not reflected in earlier the application.

- The applicant stated that success cannot be judged solely by students attending college or universities, however, none of the student achievement goals are based on career readiness or preparation either. This is problematic, and indicates that the applicant has more work to do in solidifying final goals for students attending NAS-Las Vegas.

Community Involvement

- The capacity interview revealed the applicant team had made no connections with community groups or employers; rather it seemed the applicant was waiting to receive a charter before solidifying those relationships; as part of the school's ongoing mission and vision it is unclear why the applicant has not created those relationships ([page 12](#)).
- The applicant was unable to articulate clear evidence of success in the current operating schools or to draw connections/parallels between the current schools and the Clark County School District (CCSD). Specifically, it was not clear how Latino students, ELLs, and immigrant students are currently doing in CCSD or how this proposed school would be able to impact those students positively.
- Contrary to the technical assistance that was offered by staff, whereby the applicant was encouraged to withdraw this application to remedy this deficiency and others prior to submission of a higher quality application with substantial community support and improved academic results at a later date, EMO executives declined and elected to lobby for an approval of the application notwithstanding its deficiencies, citing the costs that the EMO had already incurred.

Program and Graduation Requirements

- The applicant listed the requirements of graduation without acknowledging the issues or items their students may need to overcome in order to graduate. The lack of clarity on the flexible schedule calls into question the timeline by which students would be able to graduate. On page 2 the applicant stated, "NAS- Las Vegas will develop and deliver high quality college and career ready curricula..." It remains unclear why the Las Vegas school would not use the curriculum from the schools under the same EMO replicating the same academic model, as the applicant failed to identify any unique needs or academic challenges related to the target population that would necessitate a deviation from a model that the applicant purports is successful. Consequently, it not clear whether the proposed school will actually be a replication of current NAS schools, which appear to be significantly different campus to campus, or if it will, in fact, even be modelled after one of these schools. It was also unclear what the common elements of a NAS school were (for example, what are the model non negotiables that make a school an NAS school). In other well-developed networks across the country whose individual schools have autonomy to modify their academic programs, there are still identified common

program elements which must be implemented and which are annually assessed by central management.

- The applicant did not make the correlation between the desired program and specific outcomes that reflect rigor. The flexible schedule did not clearly define the oversight protocols to ensure that students attend the classes needed to graduate nor did it define how those classes would be staffed by teachers. Furthermore, the capacity interview did not yield any additional information on the flexible schedule and how it would be staffed by the teachers beyond dismissive statements from EMO representatives such as “we’ll do whatever it takes” that raise significant concerns about the lack of seriousness and diligence by the vendor and point to some possible causes for the academic and organizational underperformance that the Authority identified and discussed elsewhere in this recommendation report. While the motivations of the program are admirable, allowing students to attend schools when they are able and at times that allow them to work or care for a child. The applicant still must provide a detailed plan on staffing and how it will work with the flexible schedule. Furthermore, more evidence is needed to support the staffing model so as to ensure specific services students need are available. Because staffing is unclear, the success of the at-risk programs becomes unclear as well. This led reviewers to conclude that the applicant needs to make improvements in tying these elements of the application together.
- The application did not provide specific descriptions of how the academic program would be implemented faithfully and in a manner likely to result in the replication of whatever previous success the applicant believes was achieved in other operating schools. The application discussed the “successes” of the other schools, but did not detail the method by which they will ensure fidelity to that model in Clark County ([pages 16-18](#)).
- The proposal did not identify instructional programs to identify and consider personal/social and other life skills for personalized planning, instructional delivery, and support services for all. The applicant was unable to fully articulate how the current operating schools do (and therefore the proposed school would) address remediation for students in need of additional support, which is a serious concern of the review team and SPCSA staff.
- The applicant did not mention seat time or absenteeism as a possible problem within the academic program or acknowledge students must be in their seats to learn ([page 35](#)). This is a school modeled after other schools and as part of the EMO, this section could be and should be more reflective of the practices currently used at the other schools. Given the known issues with chronic absenteeism in schools serving disconnected youth both in Nevada and nationally, the lack of attention to this efficient cause of low graduation rates is cause for serious concern.
- Though the applicant makes mention of attendance, there is little evidence presented about how the school will ensure students have the seat time needed to secure credits and work toward graduation. During the capacity interview the founding team noted this would be a problem, but indicated “if you build it they will come.” This mindset could cause long term issues for a school, both academically and financially, where staffing for a flexible schedule was still

unclear at the end of the capacity interview.

- Incentive programs, as noted in the application, are not researched based and provide no evidence that they have or can be successful in encouraging student attendance. Though the applicant stated the school would provide an intervention program, that program is not detailed. The applicant must provide a detailed reasonable plan to get students into the school daily ([page 52-55](#)). This is especially true given the at-risk population they plan to serve.
- The application lacked information regarding the attendance and monitoring process. It did not explain how student schedules would be developed, and the applicant team was unable to explain the process with any level of detail during the interview. Thus, it remained unclear how the school would ensure students are getting enough seat time. For example, if a student takes the minimum of six courses, they would not meet the minimum of 59,400 minutes ([page 55](#)).
- The sample school calendar did not indicate when the school year would start and end, so it was not possible to calculate the dates and ensure that the applicant's proposed instructional program was in compliance with NAC 387.120(2) and NAC 387.131(1) ([page 53](#)). The application stated that the school year would only have 150 days, not the required 180 ([page 52](#)), and the application stated that its students would be required to take a minimum of 900 instructional hours, or 54,000 instructional minutes, which is short of the required 59,400 instructional minutes for grades 7-12 ([page 52](#)).

Data Use, Outcomes, and Measures of Success

- The application did not include a clear process for identifying at-risk students. The only methods discussed in the application are teasing the information out of the student at registration and then relying on staff to notice the issues "over time." That is not a fully-developed process, and it was unclear how the collection of anecdotal information would translate into a classification and provision of services ([page 38](#)).
- The proposal did not sufficiently describe how instructional programs would offer a continuum of services to students through a tiered system of interventions, ensuring that all students would be able to build the knowledge base necessary to access rigorous instruction. Furthermore, the proposal did not address the evaluation of the remediation programming. This is one result of having an unclear and poorly articulated academic program.
- The academic program discussed in the application did not reflect how students would attain the units of credit needed to graduate. This concern is driven by the flexible schedule and the lack of clarity on how students would take the classes they need for the credits and how the school would be staffed to accommodate this need. Furthermore, no specific measures of college or career readiness are discussed in High School Graduation Requirements section of the application and the community service graduation requirement was not sufficiently described. For example, there did not appear to be a social studies class in 11th grade. As Nevada currently requires one credit each in social studies, American government, and American history (NAC 389.664) and the applicant intends to serve a population that has, in many cases, taken courses repeatedly and unsuccessfully, the lack of appropriate planning to ensure coverage of all

required credits is cause for serious concern

- The population this school wishes to serve has a high dropout rate, yet this section included no information on state-mandated seat time requirements, and did not address issues students may have upon entering, other than not speaking English., .
- The application did not include a strong description of structures that would be in place to support students at risk of dropping out. The only proposed structures were academic supports and counseling, neither of which would be sufficient to meet the needs of some students in the target population – those who need to earn money to support their families, those experiencing trauma, or those in need of supports outside the school environment such as health care, child care, or social services ([page 29](#)).
- There wasn't evidence the school would provide a gifted learners program. The applicant did not provide requirements for matriculation as required, other than stating it would share information with parents and students on related data ([page 25](#)).
- There was an emphasis on walkthroughs that would be used to ensure proper curriculum alignment but there was no research provided on how this is an effective methodology based on past results of implementing this approach. Project-based learning was noted several times throughout the application but there was no information on what projects students would be working on ([page 22](#)) and the applicant did not provide sufficient information to evaluate this tangentially mentioned project-based learning program and instructional approach. Scaffolding was mentioned in this section with no definition of what scaffolding for this student population would require given the flexible schedule.
- The proposed school intends to use MAP testing that will help identify students who may be struggling. Though the applicant states that students would be identified as struggling, the application provided no context for how the teachers would work with students to reach proficiency. It was not clear how peer groupings would provide a strong path toward growth; simply using MAP is insufficient to drive growth ([page 18](#)).
- There was also inconsistent and fragmentary information related to how frequently MAP will be administered in various parts of the narrative. It appears that the NWEA MAP assessment will be given in the Fall, Winter and Spring. There is no evidence the test will be given immediately upon acceptance to the school to ensure students will be scheduled for classes and remediation they need immediately and to further ensure the flexible schedule accommodates that student's needs ([page 35](#)). The applicant fails to identify how student need will be identified given the over-the-counter nature of enrollment under this model. It is unclear how those needs will be met if the school is scheduling assessments based on what is convenient for adults.
- The applicant included an excerpt from the NWEA MAP website but did not include context on how this test works with the proposed student population. The applicant stated NWEA has aligned each subject area with individual state standards. Casual marketing assurances from testing and curriculum companies regarding the alignment of tests to state standards ([page 35](#))

are insufficient evidence of alignment to Nevada's Academic Content Standards. The applicant has provided no evidence that MAP has any predictive value on any of the assessments mandated by the state for high school students, including but not limited to the medium states mathematics and English end-of-course exams that are a key component of determining whether students pass high school classes, the high stakes science examination, the high stakes ACT Aspire assessments, or the ACT itself. The applicant's reliance on an instrument with an unproven track record in those key accountability areas as anything other than an internal, teacher and administrator-level tool to measure some the pace of remediation of pre-high school skills appears misplaced and irresponsible.

Monitoring Student Progress, Discipline, and Special Populations

- While the applicant included specific goals and provided a basis for baseline student achievement, it was unclear whether the goals grow to sufficiently ambitious levels to meet the purpose of the SPCSA. While the Applicant included a range of interim goals for year one, they were not sufficiently rigorous to meet the purpose of SPCSA ([page 39](#)) or to meet the criteria of R089-16A(7)(k), which requires that applicant demonstrate the capacity to develop goals for each year of the charter contract for the proposed charter school to help measure the progress and success of the school in fulfilling the terms of its charter which...[s]upplement, but do not supplant, the indicators, metrics and measurements contained in the performance framework established by the State Public Charter School Authority. As the goals set forth in the application set far lower performance targets than those adopted by the Authority or the State Board of Education, these targets are insufficiently rigorous. This was especially concerning with anticipated attendance levels hovering around 80%. The application did not explain, for example, how this rate is successful at current schools, or what the attendance rates are for current schools. Additionally, it was not clear why, if the attendance target is only 80%, students would be considered truant after missing only 6% of days.
- The educational model was unclear, and specifically lacked meaningful detail around core academic programs and supports designed to drive significant academic improvement for all students, in line with the SPCSA's goal of double-digit gains annually across all subgroups. This lack of detail is compounded by a lack of valid research and compelling evidence of success in EMO-affiliated schools implementing similar programs that serve a similar target population.
- The applicant provided information as required by the application on all at-risk populations (homeless, ELL, Special Education) and acknowledged NAS would teach all students. The applicant did not provide specifics or steps it would take to ensure student success for each of these subgroups, including seat time. There was a lack of acknowledgement of student attendance in the Driving for Results section of the application. The Applicant should detail the plans, step-by-step, to ensure all at-risk students can and will be taught. Again the Applicant used phrases like, "Will strive to," or "will create" rather than provide any substantive relatable information. The Applicant should provide, and be definitive about, the programs they plan to choose. This school is affiliated with an EMO network, leading evaluators to believe this

information should be available based on the other schools in its portfolio.

- The application stated the “students showed evidence of adequate growth” but did not describe what the applicant believed adequate growth was for the student population. Given the persistent underperformance of the Colorado schools served by the same EMO, this applicant’s definition of adequate is insufficiently rigorous.
- The application lacked a clear plan for ensuring that vulnerable student populations are not disproportionately impacted by discipline policies. The application stated that it would monitor data to evaluate whether certain populations are not disproportionately impacted, but there was no discussion of what the school would do in possession of that data, or what would be done to prevent that outcome from occurring ([pages 50-51](#)).
- The applicant did not demonstrate meaningful understanding of several key criteria including a process of setting and monitoring rigorous academic goals, measuring and reporting academic performance, a clear process for setting, monitoring or revising lead indicator academic goals, substantial evaluation of the program and an in depth analysis of assessment data. Instead, the applicant provided minimal goals and did not align any criteria to the proposed student population ([pages 29-38](#)).
- The application did not include a description of research-based strategies to support students’ social and emotional needs, those with behavioral concerns, or detailed information about how individual behavior plans for students would be implemented and monitored. The two strategies discussed were the use of an advisory period to help students “develop positive, whole-child, affective traits to successfully navigate challenges” and building a strong sense of school community. Since the target school population includes students who may be dealing with extremely dire issues, including homelessness and/or trauma, those two strategies were not sufficient to support students in navigating complex issues ([page 48](#)).
- The proposal references both a Student Support Team and a Response to Intervention (RtI) team but did not describe the composition of either, nor explain how they would interact. There is insufficient information provided in either the staffing plan or the budget narrative to verify if these teams will in fact exist. Given that there is only one special education teacher, for example, it is unclear how there are sufficient dedicated staffing resources to constitute a team. ([page 45](#)). This level of staffing seems insufficient given the applicant’s plan to provide services to students on a drop-in basis for over twelve hours a day. Such a student-centered model demands a far more robust, even duplicative staffing model in order to ensure coverage and compliance with state and federal law.
- There was extensive discussion about different features of the model, such as scaffolding and the levels of ESL course work, but there was no discussion regarding research practices informing the design of the school model or predicted student achievement outcomes ([pages 15-18](#)).
- The applicant relied on data that is just shy of 5 years old, and did not show recent data

regarding the population that is dropping out. The student discipline section would likely look completely different if no data was collected. The demographics of the students will drive school culture, discipline and the academic program ([page 49-52](#)).

- It was not clear why the school is choosing to not use the code of conduct from the existing schools. The application did not describe how the proposed elements of discipline are implemented at current schools or how successful they are by addressing, for example, expulsion and suspension rates for the current schools, or explaining how the implementation and rates of highest level consequences affect students with disabilities, minorities, etc.
- In the driving for results section, the application included a lengthy discussion of Restorative Practices as a strategy for building a positive school culture and framing the school's behavioral expectations. There was no discussion, however, about issues arising for students who have specific needs ([pages 39-40](#)). More description and detail would be beneficial, and would clarify how these practices will be used within the context of school operations.
- The application did not provide a sound staffing plan to ensure the consistent implementation of all programmatic elements in addition to the school culture. It is unrealistic to expect the principal to also be the student discipline lead during the first two years – that arrangement would not allow the principal to be an effective principal OR an effective student discipline lead ([page 50](#)).

School Culture

- Parent input as an important stakeholder was not included in the school culture section. The application provided no specific goals for parents or students in relation to data collection on students' school culture. This was not reflective of the school's mission and vision. The applicant chose an entire at-risk underserved population but never identified the importance of school culture to help drive academic success ([pages 47-49](#)).
- The application did not describe how school culture will be manifest itself, and did not connect the proposed ethos to academic environment or student development. It also did not tie in restorative practice to the proposed ethos ([page 50](#)).
- While the application lists a number of inputs and measures of school culture it did not discuss analysis or evaluation of the programming. There was no concrete plan to enculturate students so they would be able to adapt to the school culture. This gap was compounded by the fact that the plan lacked detail around the implementation of a split schedule. It was unclear how the school would ensure consistent culture across the full 14 hour school operational day. There was repeated discussion of "messaging" expectations, but that is not itself a sufficient implementation plan – especially for a school serving a target population where there will foreseeably be many complex school culture issues to address.
- School culture normally drives the academic success of a school. The applicant presented very basic information on how it would form and implement a strong school culture for students based on the application's mission and vision. During the capacity interview the founding group

could clearly articulate what they believed their student population may be, but that knowledge was not reflected in the application. The founding team did not seem concerned or reflective about gang populations, violent offenders, or other issues that could affect student culture and what this could mean for the discipline plan for this population. There are approximately 20,000 gang members in Las Vegas and many of them are young adults who would fall under the criteria of admittance into this charter school. To think the school may not enroll some of these students may be unrealistic and the applicant should address, and identify, possible discipline issues. The applicant should consider revisiting the student discipline plan and take into consideration the actual demographics of City of Las Vegas. The group, instead, spoke of the schools the EMO currently runs and how culture and discipline work in those schools.

- The staffing plan described in the application may not be realistic because it is based on a best-case scenario – hiring teachers who have previous ELL experience. It was unclear how the teachers and school would manage to maintain an ELL-intensive program without adequately-trained staff in the event new teachers did not possess ELL experience prior to working at NAS_ [\(page 44\)](#).
- While multiple staff meetings are regularly scheduled (Kid Talk, support staff, monthly PLC, bi-weekly data) it was not clear how they would specifically support universal access to general education. While the application noted that NAS would adhere to staffing requirements, it did not address ensuring that sufficient staff for special populations would be present at the start of the year [\(page 46\)](#).

Operations Plan

Does Not Meet the Standard

Summary:

NAS-Las Vegas plans to partner with the New America School (NAS) Network, a 501(c)(3) nonprofit charter management organization headquartered in Denver, Colorado, to accomplish the mission and vision as described in the application and, ultimately, an approved charter. The NAS superintendent will be mainly responsible to provide the mentorship, executive coaching and support to the school principal. The NAS superintendent brings 42 years of experience to this role including service as teacher, vice-principal, principal and superintendent in various districts. The largest district he was responsible for was the west district of the Toronto District School Board, in Toronto Canada that included 300 schools, and more than 450 principals and vice principals. In addition to staffing support, the principal and the governing board will be part of NAS Network board meetings.

Areas of Strength:

- The applicant outlines the basic responsibilities of the board. Staggered terms to ensure stability are incorporated into the by-laws and a seat has been reserved for a parent representative. There is a basic articulation of the difference between governance and management.
- The NAS superintendent will coach the school leader. The NAS superintendent has previously coached the five current NAS principals ([page 80](#)), and the hiring process includes portfolio review and model teaching ([page 81](#)).
- The proposed job description for the school leader aligns with the description of responsibilities in the application, including the mission, vision, program, and other characteristics required to operate a high-quality school.
- The applicant provides a sufficient infrastructure to support this school in the network. The outline provided a thoughtful progression of responsibilities for scaling the model.
- The applicant appropriately distinguishes between management and oversight ([page 66](#)) and a plan for recruiting board members is laid out.
- Several Board Professional Development topics are described and provide an adequate level of detail ([page 71](#)).
- Several of the proposed board members have strong experience with education and community engagement, including membership on other boards serving the target community ([Attachment 8 64-65](#)).
- The application includes a clear description of the delineation of responsibility between the

board and the school leader – it is clear that the school leader will be responsible for operations and the board will be responsible for oversight. The application proposes a sound oversight structure for the board, including multiple committees and training to support strong governance ([pages 68-75](#)).

- The application includes a detailed plan for managing student information, including discussion of the use of Infinite Campus and maintaining the security of the information ([pages 107-108](#)).
- The application includes a detailed plan for maintaining the safety of the facility ([pages 113-114](#)), which gives the review team that the applicant understands its responsibilities once a facility is named.

Areas of Concern:

- Despite some basic understanding of governance on a broad scale, the applicant does not appear to understand the appropriate delineations and requirements under Nevada law. It is unclear if the applicant team understands the difference between an educational management organization (EMO) and a charter management organization (CMO) under Nevada law. In the applicant cover sheet, the applicant states that it is a charter management organization. It lists three employees of that entity, Dominic DeFelice, David Rein, and Craig Cook, as the applicants (the founding team). These individuals are identified as the CEO, Director of Development, and CFO of the organization, respectively ([page 1](#)). However, the New America Schools Network is not a charter management organization; it is a non-profit educational management organization that enters into management contracts with independent charter school governing boards. The applicant acknowledges this in the operations section of the application ([page 101](#)). Thus, in the early pages of the application the individual who wrote the application failed to appropriately identify the true members of the committee to form, instead identifying staff for a proposed vendor. Consequently, the applicant failed to demonstrate the capacity to meet R089-16A(7)(o)'s criterion related to ensuring the thoroughness and accuracy of the information contained in its application.
- The committee to form contains representatives of an educational management organization (see NAC 386.345). At least one member of the committee to form was a member of the board of the EMO at the time of application and during the capacity interview. This is not in accordance with NAC 386.345, which precludes the membership of any vendor on the governing body of a charter school, and NAC 386.130, which prohibits a sponsor from acting any application which includes a person who is a potential contractor or a representative of an educational management organization.
- The applicant did not provide compelling evidence that the governing council knows how to provide sufficient oversight of the EMO. The EMO will “consult with” ([Attachment 23](#)) the school on a number of items – facility, finances, academics, staffing and governing

council for a fee. The applicant must provide criteria and metric by which they will monitor the EMO rather than relying on information the EMO provides to them to drive decision-making. The applicant was able to identify some of the roles and responsibilities of the Board, yet it never made an express delineation. The Board appears to rely more heavily on the EMO to guide its success, and by stating they are “consulting with” it shows the EMO has no clearly defined obligations to meet. The capacity interview did not clarify the goals of the EMO.

- The Leadership Team chart has the governing board on the same line with the EMO. The EMO is hired by the council and they are a contracted service provider. They are not equal to the board. The Principal is on the same line with the assistant business manager and the assistant principal. The applicant needs to provide clarity on the charts and why they chose this model ([page 76](#)).
- None of the proposed board members have strong experience with legal matters, financial management, or human resources ([Attachment 8 64-65](#)), which could lead to a lack of oversight on financial and organizational matters.
- Only one eligible governing body member who was identified in the application chose to attend the capacity interview, giving the review team pause about the level of support for the school. All other attendees were either employees of the EMO, board members of the EMO, or staff or board members of other client schools of the EMO in other states. Moreover, the sole member of the proposed governing body who attended the interview repeatedly delegated even basic interview questions to others. Critical topics such as compliance with state and federal law in the area of civil rights, the evidence to support enrollment projections, enrollment policies, the recruitment and retention of students, parent involvement, the management and governance structure, the quality of the academic program, the bylaws of the school, the school’s academic goals were delegated to EMO representatives. Due to the failure of the educational management organization to effectively communicate the importance of attendance at the capacity interview, the sole representative, a devoted community leader, was placed in an untenable position and the committee to form was unable to demonstrate in person that it met the criteria for approval set forth in R089-16A(7).
- The applicant must detail the specifics of the role of NAS as the EMO. The role was confusing and lacked accountability criteria. It became clear in the interview that the school would not actually be part of an EMO, which considerably weakens the proposal by compounding all other deficiencies. It was unclear to whom the principal and the consulting staff would report, and how either will be held accountable by the board.
- The applicant must clearly define the academic goals and responsibilities of the EMO. The money the school will pay the EMO is significant; (\$60,000 annually, \$10,000 annual membership fee and a one- time \$50,000 licensing agreement that is payable in 5 payments) \$80,000 per year at a minimum and because there is no set criteria for the EMO in relation

to academics it is the obligation of the applicant to clarify those roles and responsibilities. Because the proposal includes a one year contract, it was not possible to assess whether the fees would increase in out years of the charter term.

- In lieu of the required operational execution plan requested in the application, the applicant provided a policies and procedures document that was plagiarized in its entirety from a 2008 publication of the Nevada Department of Education which has been superseded by nearly ten years' worth of legal and regulatory changes. Beyond placing a cover sheet with the school's name and a mock address at the front of the document the document there was no evidence of any attempt to modify this document to provide the school specific detail necessary to make it consistent with the school's own proposed organizational model, governance structure, management company relationships, or other critical nuances. The inclusion of these materials provides no additional insight into the capacity of this applicant and is unresponsive to the application prompt, which is a request for a plan that "identifies the key organizational business processes necessary to support exemplary academic, business and financial performance including those discussed in this narrative. This operational execution plan may be in a format of your choosing, and may include Gantt charts, process maps or flow charts, or other appropriate illustrative devices in addition to a coherent and well-developed narrative." Moreover, this plan reflected a number of the same deficiencies outlined in the findings of Colorado CSI related to the financial policies and procedures of the Thornton and Lowry schools, including the failure to include a suspension and debarment provision or a provision that prohibits a vendor that develops or drafts specifications for bids or RFP's must be excluded from competition for that procurement. Consequently, the applicant failed to demonstrate the capacity to "develop a management plan and structure which enables the proposed charter school to function at a high level of performance and which will achieve the goals and mission set forth in its charter contract (R089-16A).

Staffing Plan:

- The application did not explain the rationale for an assistant business manager as a full-time employee. In the capacity interview, the applicant was unable to explain how the dual reporting for the staffer to the back office provider and the school leader would work. It was not clear where this person was appropriately reflected in the budget, staffing plan, and organizational chart.
- The application proposed a very lean administrative team for the first two years, with the principal taking on a disproportionate number of responsibilities, including all of student discipline, teacher observation, and teacher training. (Leadership Team Job Descriptions, pages [\(76-80\)](#)). This was concerning to the review committee, and may lead to the school leader being stretched too thin and unable to accomplish any of the tasks with success. For example, it does not seem feasible that the principal will be able to visit every class every day, given their other important responsibilities.
- The applicant initially set specific criteria for teachers that were not included in the staffing

plan which include ESL certification. The staffing section did not include this information within the chart ([pages 81-83](#)). The applicant should clarify the staffing chart to show it is aligned to the mission and vision of the school. If the school day is to run from 7:30 am to 10:00 p.m., the school will need more than 1 school leader and 5 teachers to staff all hours ([pages 81-82](#)).

- It was unclear whether the proposed school is appropriately staffed to serve the intended student population. With a target student population involving many at-risk students, it may not be realistic to plan for only 1 ELL teacher, 1 SPED teacher, 1 counselor, and 1 aide ([pages 81-82](#)). The interview did not provide additional clarity about the staffing plan – the applicant team was unable to provide a clear description of how the school would be able to implement the proposed education plan with fidelity at such a low staffing level, particularly during the first year.
- The applicant should identify how they will find a high performing school leader that has familiarity with this specific population. The governing board is relying on the EMO to evaluate the principal yearly. The applicant should provide other data points they may review for the school leader on a more regular basis. There was a goal of 80% staff retention but clarification was needed on if this was over the life of the charter term or annually as it may be difficult to achieve given the staff turnover experienced at other charter schools throughout the state and Clark County in particular.
- It was not clear whether the salaries and 2% cost of living adjustment will be sufficient to attract and retain bilingual/ESL certified teachers. This issue is compounded by a lack of information on staffing retention rates at current schools and the potential for burnout given the lack of clarity around the daily schedule of each staffer and the high-need student population. Again, it is unclear how the daily and weekly schedules will be handled in order to make the proposed salaries sufficient to attract teachers that are sufficiently prepared to address the high need student body.
- The school staffing structure does not seem likely to ensure high-quality teacher support/development, student/family support. Given that faculty will be required to staff the school from 7:30 am to 10:00 pm, and the staffing plan does not allow for any coverage, it seems highly likely that teachers would find the workload unsustainable. The staff supports described in the application, including trainings and observations, are aligned with sound practice, but may not be sufficient to support the teacher through the daily challenges and a longer than normal schedule. ([pages 84-85](#)).
- The decision making table was incomplete and incorrectly filled out. If the network has no responsibility or accountability in any of the decision-making areas, the board will have difficulty assessing their work to determine whether they should continue to contract for services.

Essential Functions and Back Office Supports

- The application did not include a clear description of how essential functions and processes,

including background checks and payroll, benefits, and employee relations, would be completed, and which entity would own these functions ([pages 86-87](#)).

- The applicant provided the date of August 2018 to have a curriculum in place in the incubation year development timeline. Given the specific program requirements, the student population, and the criteria for teachers needed to effectively implement this program, it is unclear why this key piece of the application would be so delayed. The date of August 2018 also ties into professional development calendar and does not allow significant time to effectively evaluate alignment to the standards. Similarly, it was not clear what the current NAS curriculum products were, nor what products would be used in the NV school. Therefore it was not possible to assess what would need to be done to prepare them for the new school and NV standards ([page 296](#)). This activity should ideally be completed prior to charter submission. Even a cursory review of the approval conditions routinely imposed on approved Nevada charter schools would demonstrate that such a deficiency must be addressed in full prior to execution of the charter contract.
- The incubation timeline did not include all key work streams, notably missing were staffing, facility, and student recruitment. It was also noteworthy that the proposal stated that the principal would not be hired until January, and who would be responsible for the workload in the absence of this hired individual.
- Technology plans are not described, despite the fact that the proposal indicates that students will use online credit recovery. Additionally, the proposal does not explain what access students would have to school-owned devices, where these devices would be housed, or what the student to device ratio would be.
- The application stated that the school would not provide food services during the first year of operation, which appears to conflict with information provided during the day in the life section of the application ([pages 56-57](#)). Additionally, the application's suggestion that students could go off-campus for food may not be feasible under the school's proposed schedule, where students have only 35 minutes for lunch and 20 for dinner ([page 54](#)). It also may be a hindrance to students who are homeless or rely on the FRPL program.
- The cost basis for the facilities and related figures in the budget is not thoroughly described. This is compounded by the fact that no action has been taken to research or locate potential buildings. While it is understandable that applicants choose to be vague about prospective facilities in the charter application due to both competitive and negotiation risks, the committee to form failed to demonstrate that either it or the EMO were in the process of searching for or negotiating for a facility. Given the operator's lack of track record in Nevada, this is a glaring omission.
- The facilities section in the application did not mention that the facility would need to be located near a bus line. As discussed in an earlier section, this will be important because students will rely on public transportation to get to school.

Recruitment, Enrollment, and Miscellaneous

- The recruitment plan in the application is not specific to Las Vegas, Nevada, and is still being finalized. As identified earlier in the application the committee to form has done little work in relation to community and parent engagement. It was unclear whether the proposed strategies would actually reach the targeted students. Additionally it was not clear how recruitment for year one will be targeted ([page 96](#)). It was also not clear whether the school intended to just enroll all students on a first come, first serve basis and then use a lottery mechanism from the waitlist, or if a more traditional application/due date/lottery/backfill process will be used ([page 100](#)).
- The enrollment tables with projected enrollments relied heavily upon many students enrolling in each grade and not just 9th grade, or the entry grade. This may not be a well-founded assumption. For example, in Year 1, the enrollment table plans for 40 9th graders. In Year 2, there are plans for 55 10th graders. Even if all 40 students progressed from 9th grade to 10th after the first year, it may unrealistic to expect enrollment to rise that greatly ([pages 98-99](#)), and the review committee had concerns about how these assumptions could negatively impact the financial viability of the school.
- The application did not demonstrate the current operating schools are objectively successful across a spectrum of measures. Thus it was not possible to make comparisons to CCSD, other charters, or other alternative programs in NV or elsewhere.

Financial Plan

-Does Not Meet the Standard

Summary

A back office educational management organization, schoolAbility (sic), is identified as the manager all business office functions including Human Resources, Payroll, Employee Online Portal, General Ledger, Accounts Payable, Accounts Receivable, Cash Receipts, Budget Development, Banking, Purchasing, Receiving, Fixed Assets and Inventory, and reporting to all local, state, and Federal agencies. New America School Network is an educational management organization under Nevada law. It contracts with three charter schools in Colorado and two charters in New Mexico. Based on audited financials of the existing schools, the New America Network of schools is financially solvent with no major deficiencies. However, the application omitted a number of critical metrics that the Authority requested, including unrestricted days cash, surplus margin, and cash flow. Due to the omission of that data by the EMO, the application remains incomplete and a complete review could not be made. Should eligible, independent members of the committee to form choose to apply with a new EMO at a later date, they are strongly advised to scrutinize all materials prepared on their behalf by the EMO or any consultant far enough prior to review to ensure that such vendors are providing complete and accurate information.

Areas of Strength:

- The narrative includes a list of expenditures by general category.
- Assuming schoolAbility is a quality vendor with sufficient experience, outsourcing seems logical to support the principal ([page 118](#)).

Areas for Improvement:

- NRS 388A.393(2) defines an educational management organization as “a corporation, business, organization or other entity, whether or not conducted for profit, with whom a committee to form a charter school or the governing body of a charter school, as applicable, contracts to assist with the operation, management or provision and implementation of educational services and programs of the charter school or proposed charter school. The term includes a corporation, business, organization or other entity that directly employs and provides personnel to a charter school or proposed charter school.” The proposed back-office vendor, schoolAbility, is an educational management organization under Nevada law. The application writer failed to provide any the information required of it, including that pursuant to NRS 388A.246(36) or any of the additional materials required in the charter application regarding schoolAbility. Most notably, a final, negotiated management contract and a term sheet were not provided and the applicant provided no information specific to the organizational or operational track record of schoolAbility.

- During the capacity interview, the founding team was specifically asked about the contingency plan, and how it would react if revenues were not received. The Applicant stated it would reduce instructional staff, support staff and administrative staff, but there were no other alternatives other than reducing staff members generally and no rationale provided for this approach. Given the already limited staffing model of this proposed school and the challenge of staffing it across both a day program and an evening program, it is unclear that this is a viable or effective strategy for reducing expenses. The applicant must have a strong plan to ensure the school functions as intended and the applicant was unable to articulate that plan. Additionally, the viability of the financial program ties directly into concerns around recruitment and enrollment.
- In the application it was acknowledged the governing Board would provide financial oversight as one of their primary responsibilities. However, the financial planning section of the application, and the capacity interview, did not provide any additional information in regard to mission critical expenses in relation to financial crises beyond vague generalities.
- The primary EMO, NAS, is listed as providing financial monitoring in ([Attachment 23, page 9](#)). It appears that this is an oversight function whereby one EMO, NAS, is supervising the activities of another EMO that is retained separately by the school. It is unclear why the applicant has chosen this structure, as such an oversight role is more appropriate to public employees or public officers and is a core function of a well-developed and appropriately qualified board finance committee. Moreover, if NAS has access to the daily operations/cash flow, they should know immediately of potential financial issues and be able to recommend changes rapidly. The applicant did not provide any evidence the EMO had the obligation to train the board to raise funds or provide them with alternative contingency plans beyond the questionable tactic of cutting an already bare-bones staffed school. The EMO runs five schools and it is not unreasonable to expect that they have the expertise to advise the board on ways to ensure critical budgeting does not affect the academic program.
- It was not clear whether the schoolAbility business manager would work onsite and be 100% time on NAS LV. This could be problematic as a primary goal is to support the Principal and limit their responsibilities.
- Given that the school reports that it has won a grant from the Nevada charter schools program grant program, it is troubling that the application did not explain who would handle grant management. However, a review of the CSP grant application reveals that in fact the organization that is now listed as the EMO actually received the grant. Given that vendors are ineligible to receive such grants, it does not appear that the applicant did sufficient due diligence to determine what relationships with EMOs are and are not allowed under Nevada law.
- It was unclear how five general education and 1 special education teacher would suffice for 185 kids with a 15% special education population, nor whether the salary would be sufficient if the special education teacher would work the whole day. The budget narrative does not include the ELL teacher mentioned elsewhere.

- It is not clear what textbooks and curricular materials the school will be purchasing, especially given that the application did not address what curricular products would be used ([page 370](#)).