

Charter School Application Report

Nevada Strong Academy Charter School

Recommendation from the Summer 2019 Charter Application Cycle

General Information

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

Process/Key Dates for Nevada Strong Academy

- New Charter Application Training
- March 15, 2019 – Notice of Intent is received
- July 15, 2019 – Application is received
- August 15, 2019 – AB 462 Addendum is received
- October 14, 2019 - Capacity Interview is conducted
- December 17, 2019 – Recommendation is presented

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

Planned Enrollment Chart²

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

Executive Summary and Recommendation

The review committee and SPCSA staff find that the Nevada Strong Academy charter school applications has shortcomings within all four components of the submitted application. Regarding the proposed academic, organizational and financial plans, there are significant identified weaknesses that do not meet the standards as outlined in the charter application rubric. The applicant was unable to provide the review team with a clear understanding of the academic plan. More specifically, the plan to support key demographics such as English learners is only partially developed. This is compounded by the applicant’s intent to serve a high proportion of EL students and an absence of identified curricula across all subject areas.

Substantial gaps exist within the organizational plan, including a lack of clarity about the roles and responsibilities of the proposed EMO, The Royal School System. Conflicting information exists within the application about the reporting and accountability structures both at the management and governance levels, which are critical to evaluating the application. The staffing plan is underdeveloped and does not provide adequate supports, as presented, for key

² Multiple enrollment proposals exist within the application (pgs. 1-5; 5-107; 5-109 – 5-110; budget). Enrollment information through year 5 was confirmed by the Committee to Form during the capacity interview. The Review Committee was unable to confirm proposed enrollment for the school in Year 6 due to the multiple versions presented and the time constraints of the capacity interview. More information on this deficiency can be found within the Organizational section summary.

³ The school plans to ultimately serve students in grades K – 12, but would not serve students above 10th grade in the first charter term.

demographics. The incubation year plan requires more detail to demonstrate a preparedness to open successfully.

The presented financial plan raises significant questions and concerns about the school's viability. No Commitment Letters are provided to bolster budget assumptions, and the proposed management fee structure is significant and is the maximum amount permissible in Nevada. Additionally, the assumptions related to the National School Lunch Program (NSLP) and a prospective facility are underdeveloped and require further detail.

The review committee and SPCSA staff find that the Nevada Strong Academy charter school application partially meets one of the identified needs within the SPCSA Academic and Demographic Needs Assessment. The Committee to Form has identified possible zip codes in which to locate that have a concentration of 1 and 2-str schools, but fails to provide significant evidence of community engagement and demand for the school as proposed.

For these major reasons, in addition to those outlined throughout this document, staff's recommendation is to deny the Nevada Strong Academy charter school application

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

Summary of Application Section Ratings

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

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

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

The rubric is broken into four major sections as outlined below and detailed descriptions of each rubric item can be found in the full rubric located on the SPCSA Application website:

http://charterschools.nv.gov/OpenASchool/Application_Packet/

Meeting the Need: Approaches the Standard

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

Academic Plan: Approaches the Standard

- Mission and Vision
 - Approaches the Standard
- Transformational Change

- **Does Not Meet the Standard**
- Curriculum & Instructional Design
 - **Does Not Meet the Standard**
- Distance Education Requirements
 - N/A
- Pre-K Requirements
 - N/A
- High School Graduation Requirements
 - N/A⁴
- Driving for Results
 - **Approaches the Standard**
- At Risk Students and Special Populations
 - **Approaches the Standard**
- School Structure (Culture)
 - **Approaches the Standard**
- School Structure (Student Discipline)
 - **Approaches the Standard**
- School Structure (Calendar and Schedule)
 - **Approaches the Standard**
- A Day in the Life & Scenarios
 - **Approaches the Standard**

Operations Plan: Does Not Meet the Standard

- Leadership Team
 - **Approaches the Standard**
- Leadership for Expansion (Experienced Operators Only)
 - N/A
- Staffing

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

- **Does Not Meet the Standard**
- Human Resources
 - **Approaches the Standard**
- Scale Strategy (Experienced Operators Only)
 - **N/A**
- Student Recruitment and Enrollment
 - **Does Not Meet the Standard**
- Board Governance
 - **Meets 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: Does Not Meet Standard

Meeting the Need Section

The applicant identifies zip codes in which to locate that have a number of 1 and 2-star schools, attempting to meet the geographic need as outlined in the SPCSA Needs Assessment. Additionally, the proposed founders and proposed Board did demonstrate a passion and desire to create a high-quality option for all students. However, despite the number of letters of support, community engagement to date in the proposed zip codes is rather limited. The Committee to Form did articulate plans to conduct community outreach post-approval, but there is limited evidence that the proposed model has been tailored to one of the identified communities, few letters of support originate from one of the identified zip codes and no Intent to Enroll forms were included in the application.

Areas of Strength

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

Areas of Concern

- The Committee to Form confirmed that there are identified zip codes that the school wishes to serve but indicated during the interview that a final location had not been chosen. Additionally, the applicant confirmed that no formal student recruitment has occurred to date. This raises a number of questions about the demand for the proposed school model, community support for the proposed school and the ability of the school to be fully-enrolled.
- The applicant team stated during the capacity interview that they have engaged with the community by attending various activities and going to churches to raise awareness about the proposed school. The applicant team also stated that parents and families of school-aged children have completed surveys as a result of these events to date. No evidence of that support exists in the application.
- One of the proposed founders noted that she is aware of the needs of the community as an active volunteer at a local preschool in one of the proposed zip codes and is an active member of an advisory board as well as other organizations. However, other than naming that restorative justice practices can help students, no other examples were provided. It is not clear that the community has been an active participant in the application process, or that community input has molded the application or proposed school model. The applicant expressed frustration that it is difficult to accomplish this pre-authorization, but limited community engagement is problematic.

Academic Section

There are a number of weaknesses that raise serious questions about the applicant's readiness to open within the academic section. Specifically, the applicant does not have a proposed curriculum nor is there sufficient evidence that the school has adequate supports for historically underserved demographics such as English learners, which are projected to comprise approximately 40% of the proposed student body. The applicant also seeks to implement a large number of instructional approaches, but was unable to clearly articulate how each of these pieces fit together both in the application as well as during the capacity interview.

Areas of Strength

- The Board is comprised of multiple individuals that have experience within education, and understand the importance of data, community and family engagement. Additionally, the applicant noted during the capacity interview that an academics committee is already established.
- The applicant spoke to the importance of home visits during the incubation year, a process that would help the proposed school begin to build relationships with students, families and parents as well as increase stakeholder investment in the school community.
- The academic plan includes proposed goals in multiple areas –ELA/Reading, math, science, college and career readiness, parent satisfaction and student retention—that all tie to the mission and vision of the school.

Areas of Concern

- The applicant forecasts serving approximately 160 EL students beginning in year 1 and states that the school will support EL students to become proficient in reading, writing, speaking, and listening. It is not clear how the presented plan combined with limited staff will effectively do this work.
- The application includes nine core elements and three unique approaches—TIP, Royal Block, and STREAMS 360—within the proposed academic model. The applicant was unable to clearly articulate how all of these design elements would work together in order best serve all students, particularly those from an underperforming demographic.
- While the proposed model is identified in partnership with the Royal School System (EMO), the applicant does not provide a final curriculum or even a list of possible selections. Within the incubation year and operational execution plan, it is noted that curriculum will be developed and finalized, but it raises questions about the applicant's readiness to open given that this critical piece of the academic model has yet to be identified. Other portions of the application also appear underdeveloped and/or may not be aligned to the proposed model. Specifically, Response to Intervention descriptions are vague and general, lacking detail. Within the Day-In-The-Life scenarios, daily schedules indicate that students will recite the Texas Pledge each day, which does not have a direct tie to the model. Significant gaps exist within the academic model, and more information is needed to understand how these components can be effective.

- The application notes that Royal School System does not have a data system. This is concerning given that the application consistently discusses the importance of data in decision-making, both at the management and governance levels.

Operations Section

While the members of the proposed Board bring a wealth of diverse experiences and backgrounds to the school, and efforts have been taken to establish key structures such as committees, there are many shortcomings within this section. A number of concerns center on role and accountability structures for the proposed EMO, school leadership and school staff. There are also questions about current student recruitment efforts to date as well as the proposed staffing model and its ability to effectively support the proposed student body. Until the capacity interview, the school presented multiple, varying student enrollment numbers for the school raising questions about the applicant's understanding of the school proposal and attentiveness to chief factors that inform the entire school proposal.

Areas of Strength

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

Areas of Concern

- Multiple enrollment plans were presented within the proposal, and it was not until the capacity interview that the applicant team provided the correct enrollment numbers. Different enrollment numbers for the initial term exist in multiple places within the written application. For example, the enrollment figures within the coversheet did not match submitted budget. While the applicant stated that these were typos, and that the budget included the correct figures, the review team was troubled by the lack of consistency in an area of the application that impacts most other sections. Concrete enrollment plans are fundamental to a successful charter school application.
- The Board articulated that a primary reason for choosing the Royal School Services was their ability to develop the principal's capacity, and the time and attention they can devote to leadership development. The review committee has reservations about the on-site support the EMO can provide the proposed leader given that they are currently not located in Nevada.
- There was a lack of clarity and completeness with regard to the proposed role of the EMO. The applicant team explained during the interview that the draft services agreement provided in the application is about 75% complete, and it is premature to finalize the agreement at that time. However, it is incumbent on the Board to understand the key terms of its agreement and speak to how it will hold the EMO accountable.
- The relationships between the Principal, EMO, staff and Board are ambiguous and conflicting in multiple places within the application. For example, in one part of the application it states that the Principal reports to the EMO; in another, the application

states that the standard protocol is for the Principal to report directly to the proposed governing board. Similar conflicting information is provided for teachers. These concerns were heightened during the capacity interview as EMO representatives took the lead in providing clarification regarding these foundational relationships. While Board stated during the interview that they are ultimately responsible for the charter contract, the relationships and accountability structures need to be further clarified.

- During the capacity interview, the proposed Principal noted that her role with regard to the EMO is fluid and can evolve. This reiterates many of the concerns listed above—the relationships between all parties is not developed and remains unclear. Moreover, it also raises questions about what elements of the Royal School System initially attracted the proposed Board to the school, and why those identified elements are not central foundational pieces for the school proposal.
- The process for hiring and firing of staff remains unclear, due in part to the ambiguity surrounding the relationship between the EMO and proposed governing board. The draft EMO contract indicates that the EMO will make recommendations to the proposed board regarding the hiring and firing of staff but does not mention what the principal’s role might be in such staffing matters. During the capacity interview, the committee to form noted that the proposed contract could be changed, but that the principal will in fact be involved in the evaluation of the academic program. The proposed reporting structure and roles and responsibilities of the parties remain far from concrete, leaving many questions unanswered.
- The capacity interview reaffirmed that the Committee to Form understands that strong enrollment drives revenue, and can prevent some financial concerns. The application does not include any Intent to Enroll letters, however. There was a missed opportunity to fully demonstrate that the school is well supported within the community and is on its way to being fully enrolled if approved.
- ELL teacher allocation may not be sufficient when paired with the general, proposed plan for this historically underserved subgroup. During the capacity interview, the applicant confirmed that there will be only one full-time ELL instructor, but that this individual will lead professional development and help build capacity among the rest of the staff. It is not clear how the presented plan combined with limited staff will effectively do this work.
- The application provides a plan for the incubation year with key personnel that are responsible for various workstreams. Additionally, there is an operational execution plan provided within the application, but no owners are listed. It is unclear how these two documents are reconciled.

Financial Section

The applicant demonstrated a few strengths within the financial section, including a demonstration of financial and budgeting acumen and presenting a conservative budget with regard to state and federal monies. Overall, however, there are significant deficiencies exist within this component of the application. The Committee to Form is expecting substantial fundraising amounts, which are included in the budget, but does not provide any evidence of commitments. The proposed fee structure for Royal Schools is near the maximum amount allowed under Nevada law, which raises questions about the procurement process and concerns given it is a new EMO. The budget also includes some missing items such as NSLP and facility credits that raise questions about the applicant's preparedness to open.

Areas of Strength

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

Areas of Concern

- In both the application and during the capacity interview, the Committee to Form clarified that it had no Letters of Commitment to substantiate the \$100,000 fundraising figure included within the budget for Year 1. While the applicant team did note that they have personally invested in the school, and there is a possibility of bringing in national funders, no specifics were provided. This is concerning, especially since the applicant includes increased fundraising amounts in Years 2 – 6 of \$200,000 each year. This could lead to very large deficits if fundraising goals are not achieved.
- While charter applicants may contract with any EMO or back-office service provider, the proposed fee structure for Royal School Services is substantial and concerning given that Royal School Services does not have any proven results. EMO fees that range from 12% - 15% of all gross revenue are especially high.
- The applicant was unable to articulate the procurement process for how they chose Royal School Services. During the capacity interview, the applicant confirmed that no procurement process had been established for the school.
- It was unclear why the applicant team would receive a \$90,000 credit for rent in Year 1 for the proposed facility. No additional information was provided, and a letter from the

- proposed landlord was not included to explain this figure.
- The National School Lunch Program (NSLP) is mentioned within the narrative of the application but is not accounted for within the budget. The applicant stated that this was due to their assumption it would be a cost-neutral service, but this is not necessarily true as there will be start-up costs. Additionally, often times the reimbursement rate does not cover all of the administrative costs associated with implementation.

Capacity Interview Summary

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

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

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

District Input

Per Assembly Bill 462 (2019), the SPCSA solicited input from the Clark County School District regarding this application.⁵ The timeline regarding this request for input is below and the response provided by the Clark County School district is attached.

- September 16, 2019 – Memo sent to CCSD soliciting input.
- November 6, 2019 – Presentation by CCSD staff to CCSD Board of Trustees regarding input.
- November 13, 2019 – Written input provided from CCSD to SPCSA.

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