

Charter School Application Report

Pahrump Valley Academy

Recommendation for the Resubmitted Summer 2019 Charter Application Cycle

General Information

Proposed Name	Pahrump Valley Academy Charter School
Proposed Mission	Prepare all students for highly successful high school and college careers through highest quality instruction delivering most rigorous, standards-aligned curriculum, designed to accommodate learners' cognitive, academic, social, and personal growths on their way to becoming life-long independent learners.
Proposed CMO/EMO	N/A
Proposed Grade Configuration	Opening: Kindergarten – 5 th grade Full-Scale: Kindergarten – 8 th grade
Proposed Opening	August 2020
Proposed Location	89061

Process/Key Dates for Pahrump Valley Academy

- New Charter Application Training
- March 15, 2019 – Notice of Intent is received
- July 15, 2019 – Application is received
- August 14, 2019 – AB 462 Addendum is received
- November 8, 2019 - Capacity Interview is conducted
- December 17, 2019 – Application is denied by the Authority
- January 2, 2020 – SPCSA staff met and conferred with the Pahrump Valley Academy Committee to Form on the method to correct the identified deficiencies
- January 21, 2020 – Resubmitted application is received by the Authority¹
- February 7, 2020 – SPCSA staff discussed resubmission with applicant team

¹ The Pahrump Valley Academy Committee to Form requested one additional meetings prior to January 21, 2020 to further discuss the deficiencies within the initial charter application.

Planned Enrollment Chart

	<u>2020-21</u>	<u>2021-22</u>	<u>2022-23</u>	<u>2023-24</u>	<u>2024-25</u>	<u>2025-26</u>
<u>K</u>	50	50	50	50	50	50
<u>1</u>	50	50	50	50	50	50
<u>2</u>	50	50	50	50	50	50
<u>3</u>	25	50	50	50	50	50
<u>4</u>	25	25	50	50	50	50
<u>5</u>	25	25	25	50	50	50
<u>6</u>	0	25	25	25	50	50
<u>7</u>	0	0	25	25	25	50
<u>8</u>	0	0	0	25	25	25
<u>9</u>						
<u>10</u>						
<u>11</u>						
<u>12</u>						
<u>Total</u>	225	275	325	375	400	425

Executive Summary, Process and Recommendation

During the December 17, 2019 Authority meeting, SPCSA staff presented the findings of the initial review committee and SPCSA staff for the Pahrump Valley Academy charter application. The initial application was found to exhibit shortcomings within three of the four components of the submitted application. The review committee and SPCSA staff found that the proposed academic, organizational and financial plans did not meet the standards as outlined in the charter application rubric. The review committee and SPCSA staff found that the proposed Pahrump Valley Academy school had satisfactorily met the Geographic component of the Academic Needs within the SPCSA Academic and Demographic Needs Assessment. The applicant demonstrated an intent to create a 4 and 5-star school in a community that has multiple 1 and 2-star schools, and also provided a number of Intent to Enroll forms as well as community letters of support that are tied directly to the proposed community in which the school intends to locate.

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

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

Upon resubmission, the review committee determined that a few deficiencies within the original application had been addressed, and the ratings against the charter application rubric reflected these changes. Within the academic section, the resubmission includes a staff member solely dedicated to interventionist work, with clear reporting structures and a delineation of authority. This addition, coupled with the proposed staffing structure to serve EL and SPED students, can improve the supports offered to students. Other improvements within the resubmitted application included clarification about the role of prospective vendors and a more developed incubation year plan.

Despite these modifications within the resubmission, the review committee finds that the charter application has determined that the application has not ‘Met the Standard’ in a sufficient number of application components to be recommended for approval. The review committee finds that that a significant number of deficiencies exist within the resubmitted application. These include and underdeveloped academic program, a staffing plan that does not align to the proposed budget, insufficient detail about the proposed facility and the viability of some external funding.

For these major reasons, in addition to those outlined, SPCSA staff’s recommends that the Authority deny the Pahrump Valley Academy charter school application. The proposed school does not meet or exceed the minimum financial or administrative operating standards, procedures and requirements. Sound evidence is not provided which demonstrates the effectiveness of the educational program proposed for the school.

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

Summary of Application Section Ratings

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

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

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

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

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

Meeting the Need Section

As previously noted, the review team determined that the initial application had 'Met the Standard. This rating did not change upon resubmission.

The applicant clearly identifies there are a significant number of 1-2-star schools in Pahrump, and the committee to form aims to open additional choices for families in Pahrump. The committee has demonstrated its ability to build foundational support in Pahrump and the commitment to the community is clearly outlined. The township is clearly described with information about the demographics of the population as well as information about the schools currently serving the town, ultimately demonstrating a need for high-quality schools. The applicant also provided the rationale that by adding an additional school in the Pahrump community, the school would be a resource for those students who struggle with additional learning needs and/or could otherwise be considered at-risk.

Areas of Strength

- The applicant has clearly aligned with the SPCSA Demographic and Needs Assessment by proposing to locate in an area with predominantly 1 and 2 star schools.
- The applicant proposes to have extended school days thereby increasing the amount of learning time for students. This is particularly important, again, given that the applicant team intends to locate in an area of geographic need.
- The application provided information about the ways the committee to form will engage parents after approval, and during the capacity interview, the committee to form was able to speak to how this work has occurred to date.
- The application is explicit about not requiring volunteering and/or fees in lieu of volunteer time and the totality of the discussion about engagement once the school is open is thoughtful and compelling.

Areas of Concern

- It is not clear how much the community has been involved in shaping the proposed school model as presented. While the community clearly supports the proposed school, it may be primarily because of the lack of quality options, not because of community-wide discussions about what model would be most beneficial to the Pahrump community.

Academic Section

As previously noted, the review team rated the initial application as 'Does Not Meet the Standard'. Previous strengths identified were determined to have remained in place upon resubmission.

Overall, some improvements were noted within the resubmitted application. The Committee to Form remains committed to a shared mission of providing an additional choice for families in Pahrump. Additionally, the guiding priorities and associated goals are clear and targeted, although the exact measurement tool is not always identified. The resubmission recognizes that there will likely need to be a variety of learning strategies made available to students given that many will be behind grade level.

However, a number of deficiencies still exist. When asked to provide clarification regarding the academic program, members of the Committee to Form struggled to answer questions specifically. The applicant could not adequately describe how their instructional model will move the needle for students, particularly EL students or students with disabilities. Proposed interventions for students are underdeveloped, and it is not clear that there is a strong plan in place to capably address students in all performance tiers. Professional development for teachers is listed as the primary method to increase capacity for ELL instruction among teachers, but this could not be described in detail and may overlap other elements of contemplated professional development. There is an emphasis on classical pedagogy and approach in the written proposal, but the interview revealed a much more general attitude toward art, music and French, which are listed as critical components of the educational program and many times in the application. These classical programmatic elements, for the most part, are not supported in the budget. These findings resulted in a final rating for this component of 'Approaches the Standard'.

Areas of Strength

- The proposed Board is composed of residents of Pahrump, and were able to speak to the positive impact this school could have for students and families.
- The guiding priorities and associated goals for the school are clear and targeted.
- The proposed leadership team has a passion for serving the students of Pahrump and bring with them complementary backgrounds that could pair well together.
- The proposal and the capacity interview show the team is passionate about serving all students.

Areas of Concern

- The committee to form struggled to answer several questions specifically related to the academic program during the resubmission process when asked for clarification. This ties to concerns about the capacity of the team to effectively implement the academic program. Previously, the representative from Saphira Associates was best able to answer some of the detailed, in-depth questions about curriculum choices and academics, but this vendor was removed from the resubmission. The proposed Executive Director, proposed Principal and the founding team staff members are primarily tasked with implementing the academic program. It is critical that the school's leadership team is able to

- demonstrate a firm understanding of the proposed academic program.
- The Response to Intervention (RtI) process described during the interview for Tiers 2 and 3 lacks detail. It is critical for the Committee to Form to articulate with clarity and detail the plans for intensive supports during the capacity interview. Questions related to specific plans for remediation also fell short. This is especially concerning given the student population the school plans to serve.
 - There is an emphasis on classical pedagogy and approach in the written resubmission, but the applicant revealed a much more general attitude toward art, music, and French, which are listed as critical components of the educational program. These programmatic aspects, for the most part, are not supported in the budget, and it is not clear how the proposed curriculum complements the classical program. When asked for clarification, the applicant noted that the immediate emphasis was on other things such as college-prep and interventions, and that these classical items would be scaled-up later after being done on a small scale the first few years – but this isn't what is reflected in the application.
 - The team could not adequately describe how their instructional model will move the needle for students, particularly EL students or students with disabilities. The plan for EL students relies heavily on professional development of general education teachers, but it could not be described in detail.
 - The plan for remediating students lacked clarity. This concern was compounded by the Committee to Form's acknowledgement that many students that the proposed school would serve will require significant remediation.

Operations Section

As previously noted, the review team rated the initial application as ‘Does Not Meet the Standard’. Previous strengths identified were determined to have remained in place upon resubmission.

There were a few notable strengths identified within this component of the resubmitted application. The proposed board is diverse and there is evidence of student recruitment from within the Pahrump community. Additionally, a prospective facility has been identified. The staffing plan has also been modified to include an interventionist, and includes possible sources of staffing talent.

A number of concerns remain within this component, however, preventing this section from being rated higher than ‘Approaches the Standard’. The Committee to Form struggled to identify a concrete, reasonable timeline to effectively recruit and retain highly-qualified teachers. Additionally, the proposed staffing plan did not match the proposed budget, raising questions about the ability of the school to implement the proposed program. Limited information is provided related to the professional development for the proposed leadership team, and the costs associated with startup expenses during the incubation year raise significant concerns.

Areas of Strength

- Student recruitment is already underway as the Committee to Form spoke to the number of Letter of Intent forms (approximately 200) the school had received. This indicates that there is demand for another school option in the community and that the school has established its brand.
- The Committee to Form and proposed Board has a diverse set of backgrounds that could effectively govern the proposed school. All members are residents of the Pahrump community and spoke to the need for a high-quality public school option in the area.

Areas of Concern

- It is not clear that the applicant team has the necessary experience and bandwidth to fulfill the former responsibilities of a prior vendor affiliated with the applicant at the time of the initial submission. Specifically, the ability of the leadership to deliver professional development to teachers and staff on culture, the construction of student portfolios, and the training of the governing board raise significant questions about the Committee to Form’s preparedness to open. Additional questions also exist regarding establishing school culture and training the principal based upon best practices and experiences of a high-performing school.
- Despite having both the proposed ED and Principal in the discussion regarding the resubmission, the Committee to Form struggled to answer many questions. The capacity and skill of leadership seems promising, but neither seems ready yet to fully comprehend – and therefore plan around – the challenges of being a start-up charter school. This is further concerning given the limited information and evidence provided on the proposed support and coaching of these individuals. It is not clear that the proposed leadership team has a demonstrated capacity to lead a high-performing school.

- The resubmitted application and the proposed budget do not match in terms of proposed staffing. Specifically, the number of full-time, part-time employees do not correspond between the two sections of the document. This raises concerns about the implementation of the proposed model, and if the budget is viable.
- The Committee to Form did not demonstrate a firm understanding of how challenging teacher recruitment is likely to be in a rural community, especially in a state with a well-documented teacher shortage. The answers to questions about teacher recruitment were conflicting and raised questions about the ability for the school to ensure a complete, full-staff is trained on the proposed model prior to the start of school. This is critical to a successful start of the school year, especially given the proposed population that the school intends to serve.
- When asked for clarification, the Committee to Form reaffirmed that a facility has been located for the proposed school. However, no supporting documentation was provided upon resubmission which raises questions about the viability of the plan. It remains unclear if the costs associated with this facility are fair and appropriate, that the facility can and will be in compliance, and that startup costs are appropriate.

Financial Section

As previously noted, the review team rated the initial application as 'Does Not Meet the Standard'. Previous strengths identified were determined to have remained in place upon resubmission.

The Committee to Form exhibited a few strengths during the capacity interview such as significant budgeting experience as well as an understanding that the budget will need to be monitored frequently, especially through the incubation year and the first year of operation.

Ultimately, there remained significant shortcomings within this component that were reaffirmed during the capacity interview. The proposed Board was unable to provide detailed answers about the proposed budget, and it was unclear that all the necessary items were included in the proposal, key items for a rural school such as teacher recruitment and sufficient evidence to support the costs associated with the proposed facility. There were inconsistencies between the narrative and proposed budget, specifically within the staffing plan. Lastly, external funding sources are not guaranteed, and timelines of possible awards is not appropriately accounted for in the submitted budget. These shortcomings resulted in the review committee rating this section as 'Does Not Meet the Standard'.

Areas of Strength

- The applicant team noted that the budget will need at least monthly monitoring by the Board during the incubation year as well as Year 1 given the number of variables associated with opening a new school. This shows that the Board is prepared to be engaged with the finances of the school and knows that the initial 18 months is a critical time.
- The applicant team noted that multiple members of the Committee to Form own small businesses, reaffirming that there is business acumen should there be a need to implement contingency plans that are budget related.

Areas of Concern

- During the capacity interview, and in the clarification meeting, budget and finance questions were very difficult for the Committee to Form to answer without the help of the CSMC representative who was in charge of crafting the budget. For example, the Committee to Form relied on a vendor to explain what the 'break-even' point would be in terms of enrollment, and the resubmission did not address this concern. It is not clear that the budget was thoughtfully crafted with involvement from the Board and school staff.
- It is not clear that the budget adequately supports teacher recruitment, professional development and materials and resources necessary to implement the classical pedagogy and instructional program being proposed.
- The team could only articulate one area to cut if enrollment targets weren't met. The Committee to Form was able to articulate that the Nevada Revolving Loan could be an additional source of income for the school. However, the award of these dollars is not likely to come until the June 2020 at the earliest, providing limited relief in terms of cashflow to the proposed school. Revenue assumptions such as the Revolving Loan require more detail and specificity.

- It is not clear that the budget, as presented in the resubmission, aligns with the proposed school model. It does not appear that the school budget embraces a true classical model.
- External funding sources are not guaranteed, and terms of the timeline(s) of the award(s) are not clear. While the Revolving Loan may provide the school with additional dollars, it is a competitive grant and funds are not likely to be disbursed until the school's first year of operation.
- The resubmission does not provide sufficient detail to confirm that the facility cost projections are conservative and viable. More information is needed to assess if the budget accurately represents the funds necessary for the school to locate in the proposed facility.

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 Pahrump Valley Academy was conducted on Friday, November 8. All but one of the proposed members of the Committee to Form attended on behalf of the applicant. Additionally, the two representatives of current and proposed vendors of the applicant – Charter School Management Corporation (CSMC) and Saphira Education Associates – attended the capacity interview. Questions during the capacity interview were developed by the team of reviewers to specifically address the details of the Pahrump Valley Academy 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 operations plan, including student recruitment, organizational chart, staff recruitment and proposed vendors.
- The academic plan, including curriculum, remediation, student support services and assessments.
- The financial plan, including the proposed budget, prospective facilities, staff recruitment, proposed vendors, and alignment to the proposed academic model.

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

Meet and Confer

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

District Input

Per Assembly Bill 462 (2019), the SPCSA solicited input from the Nye County School District regarding this application². This input is provided as an attachment alongside this item.

- September 16, 2019 – Memo sent to NCSD soliciting input.
- September 26, 2019 – Written input provided from NCSD to SPCSA.
- January 14, 2020 – Written notification from the SPCSA to NCSD regarding the potential for resubmission of the Pahrump Valley Academy application.

² 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.”