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ACTION MEMORANDUM

TO: SPCSA Board
FROM: Rebecca Feiden, Executive Director
Mark Modrcin, Director of Authorizing
SUBJECT: Recommendation to Require Certain Sponsored Schools to Develop
Recruitment and Enrollment Plans
DATE: March 4, 2022

Background

At the State Public Charter School Authority meeting on January 28, 2022, I reported that as part of our ongoing efforts to ensure equitable access to high quality schools and elevate our focus on equity, that SPCSA staff had begun discussions about leveraging regulatory authority to require certain schools to develop and submit recruitment and enrollment plans. At the Authority's March 3, 2022 board meeting, staff presented a possible approach for identifying schools that would be required to develop and submit such plans. Following the discussion at the March 3rd meeting, staff hosted several meetings with the leaders of charter schools that, based on the methodology outlined below, were likely to be recommended to develop recruitment and enrollment plans. During these meetings, staff provided background information on the proposal, answered questions, and asked for input on three key topics:

- What is a realistic timeline for developing a plan?
- What guidance would be most helpful in developing your plan?
- What else should the SPCSA consider?

Based on the discussion at the Authority's March 3rd meeting and the input provided by school leaders, staff has developed the following recommendation to require certain schools to develop recruitment and enrollment plans. Additional context regarding how this strategy aligns with the SPCSA's strategic plan can be found in Appendix A.

Statutory and Regulatory Authority

The statutory language regarding the creation and purpose of the SPCSA specifically states that one of the SPCSA's purposes is to authorize high-quality quality schools aimed at expanding the opportunities for students, including, students who are at risk. (See NRS 388A.150). Additionally, NRS 388A.249 as amended by Assembly Bill 419 from the 2019 legislative session requires that, in order to be approved, an application to open a charter school must demonstrate alignment to at least one of the needs identified in the SPCSA's Academic and Demographic Needs Assessment. Furthermore, statute requires charter schools to serve a population that is representative of their local community, if practicable. (See NRS 388A.435(3)). In December of 2017, regulations were enacted that authorize a sponsor to require the governing body of a charter school to develop and submit a plan to recruit and enroll a population that is representative of the local community. (See NAC 388A.533). While the SPCSA has yet to require a charter school to submit such a plan, SPCSA staff have annually provided each sponsored school with a report regarding the demographics of the school campus compared with the local school district and zoned, neighborhood school for the community in which the school campus is located. A memorandum summarizing the SPCSA's vision and efforts to serve a representative student population has accompanied each of these reports. Notably, for each of the last two years, the memo has specifically encouraged schools to identify ways to address any significant discrepancies and indicated that SPCSA staff anticipated utilizing regulatory authority to require schools with significant discrepancies to develop a recruitment and enrollment plan in the future.

Identification of Schools

SPCSA staff have conducted an initial analysis of enrollment data, including the free and reduced-price lunch (FRL), students with disabilities (IEP), and students identified as English Learners (ELL) populations. While the SPCSA has seen significant progress in the last few years in serving a more representative population of students (see Appendix A for details), SPCSA-sponsored charter schools overall continue to serve a disproportionately smaller percentage of students within each of these student groups. Of the three populations—FRL, IEP, and ELL—the greatest discrepancy is in the FRL population. Specifically, among SPCSA-sponsored schools, 43.4% of students qualify for free or reduced-price lunch, while statewide, 78.2% of students qualify for free or reduced-price lunch. Therefore, SPCSA staff recommend focusing on schools with the largest discrepancies in serving students qualifying for free or reduced-price lunch compared with their local school district. Below is a summary of the approach for identifying schools:

- For each school campus, compare the FRL rate to the local school district.
- For statewide virtual school campuses, compare the school's FRL rate to the statewide rate.

- For sponsored school campuses and school districts that participate in the Community Eligibility Provision (CEP) or have an FRL rate over 64%, an FRL rate of 64% would be used for this comparison¹. For more information regarding CEP, see Appendix B.
- Identify the 25% of school campuses that have the most significant gap in FRL rate, when compared to the local school district.
- In recognition of progress that certain school campuses are making, remove from the list any school campus that had at least a 25% increase in the FRL rate from the 2020-21 school year to the 2021-22 school year.

Using this methodology, SPCSA staff have identified 14 schools that we recommend be required to submit recruitment and enrollment plans. That list of schools is below:

School Campus	2021-22 FRL Rate	Change in FRL Rate from 2020-21 to 2021-22 (<i>positive values indicate an increase in FRL Rate, negative values indicate a decrease in FRL Rate</i>)	Comparison District	Comparison District FRL Rate
Alpine Academy	8.1	-40.8	Washoe	45.4
Doral Northern Nevada	6.4	-22.8	Washoe	45.4
Doral Pebble	24.4	-0.8	Clark	64.0*
Doral Red Rock	24.0	21.8	Clark	64.0*
Founders Academy	23.7	-2.0	Clark	64.0*
Leadership Academy	25.4	19.8	State	64.0*
NSHS Downtown Henderson	13.2	-5.7	Clark	64.0*
NSHS Northwest	26.2	-29.7	Clark	64.0*
Pinecrest Inspirada	13.3	6.4	Clark	64.0*
Pinecrest Sloan Canyon	17.3	-1.1	Clark	64.0*
Somerset Aliante	23.4	6.3	Clark	64.0*
Somerset Lone Mountain	24.2	-0.4	Clark	64.0*
Somerset Sky Pointe	20.7	9.5	Clark	64.0*
Somerset Skye Canyon	15.0	16.2	Clark	64.0*

* indicates rate is higher than 64%.

A complete list of sponsored schools and their FRL rates can be found in Appendix C.

Process for Development of Recruitment and Enrollment Plans

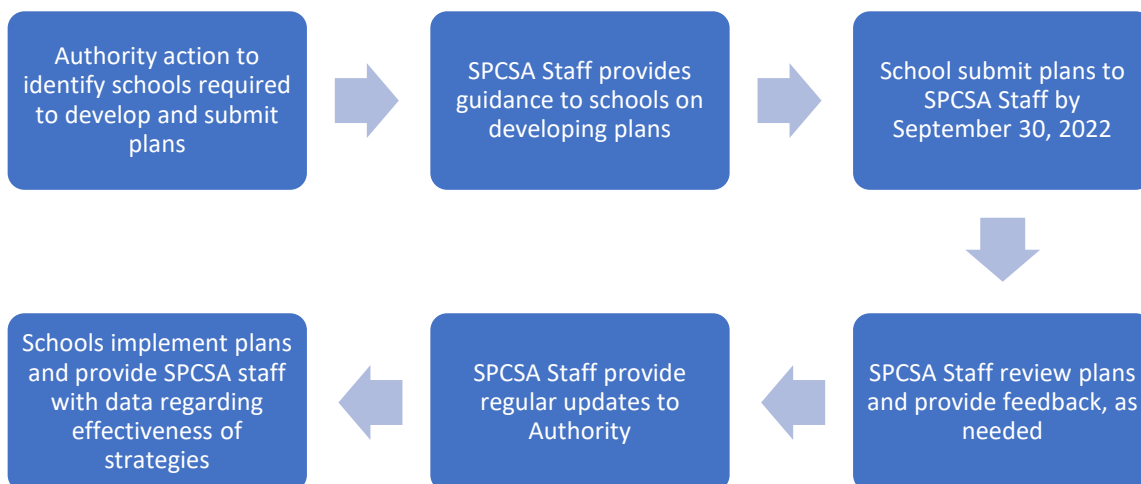
Once the Authority designates schools that will be required to develop recruitment and enrollment plans, SPCSA staff will provide written guidance to those schools. The guidance will provide details regarding the process and timeline, as well as resources and information that may

¹ CEP schools must have at least 40% of students who are directly certified for free meals without the use of household applications. This means that 40% of students must qualify for free lunch based on programs such as Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF). For the purposes of reimbursing schools for meals, the US Department of Agriculture (USDA) has set a multiplier of 1.6 to calculate an estimate of the actual percentage of students who would be eligible for free or reduced-price lunch that would be comparable to the FRL percentage at a non-CEP school. Therefore, SPCSA staff established the placeholder of 64% by multiplying the minimum percentage of students who would have to be directly certified (40%) by the USDA multiplier (1.6).

be helpful in the development of their plan. Based on input from sponsored schools, SPCSA staff recommend that recruitment and enrollment plans be due by September 30, 2022. This will provide time for schools to engage with their local communities and to analyze the impacts of any recruitment and enrollment strategies that were used to enroll students for the 2022-23 school year. Feedback from schools indicated that some would likely submit this over the summer, while others might be inclined to wait until the fall. SPCSA staff believes a September 30 recommended deadline will accommodate all schools.

Once plans are submitted, SPCSA staff will review the plans and provide feedback to schools. SPCSA staff anticipate providing an update to the Authority regarding the status of these plans and summarizing trends and themes in October or November of this year. Additionally, SPCSA staff will request data from schools in the spring of 2023 to understand the impacts and effectiveness of their plans. A summary of those findings will be presented to the Authority and inform future work in this arena.

The diagram below provides a summary of this process.



Contents of Recruitment and Enrollment Plans

Recruitment and enrollment plans are expected to include specific strategies the schools will use to recruit and enroll a population that is representative of the local community. While other student populations may be addressed, plans must at minimum focus on recruiting and enrolling a representative population of student that qualify for free and reduced-price lunch. SPCSA staff will recommend that each school consider strategies to raise awareness about the school as an option for students, ensure that the school provides a welcoming and supportive environment for all learners, and increase the likelihood that students are selected through the enrollment process. Examples of these strategies will be provided to schools as part of the guidance issued by SPCSA staff.

Recommendation

Proposed Motion: Require the following schools to develop and submit Recruitment and enrollment plans by September 30, 2022. Recruitment and enrollment plans must contain specific strategies aimed at serving a student population that is representative of the school's local community, particularly with regard to the population of students qualifying for free or reduced-price lunch.

- Alpine Academy
- Doral Northern Nevada
- Doral Pebble
- Doral Red Rock
- Founders Academy
- Leadership Academy
- Nevada State High School Downtown Henderson
- Nevada State High School Northwest
- Pinecrest Inspirada
- Pinecrest Sloan Canyon
- Somerset Aliante
- Somerset Lone Mountain
- Somerset Sky Pointe
- Somerset Skye Canyon

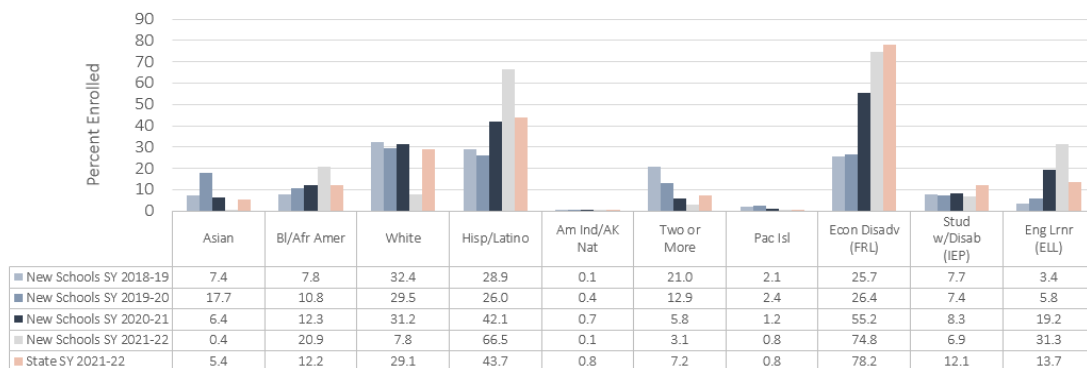
APPENDIX A: Connection to SPCSA’s Strategic Plan

In 2019, the State Public Charter School Authority (SPCSA) adopted a five-year [strategic plan](#) that centered on a vision of *Equitable access to diverse, innovative, and high-quality public charter school for every Nevada student*. As part of the strategic plan, the SPCSA established three goals: 1) Provide families with access to high quality schools; 2) Ensure that every SPCSA student succeeds – including those from historically underserved student groups; and 3) Increase the diversity of students served by SPCSA schools. Over the last two years, the SPCSA has seen progress towards all of these goals. Details regarding progress towards our strategic goals can be found in the annual [State of the SPCSA presentation](#) from February 15, 2022.

With regard to goal three, the SPCSA has adopted several strategies for addressing discrepancies in student populations:

- The Authority established and implemented the Academic and Demographic Needs Assessment;
- The Authority incorporated an Enrollment Diversity Indicator into the SPCSA’s Academic Performance Framework;
- SPCSA staff provided each school with annual enrollment reports comparing the school’s demographics to the demographics of the local school district and zoned, neighborhood school for the community in which the school is located; and
- SPCSA staff engaged with board chairs of sponsored schools about efforts to elevate equity as a focus and priority.

As shown on the graph below, new schools opened in the last two years are more reflective of state demographics, particularly with regard to the population of students qualifying for free and reduced-price lunch and students identified as English Learners. Additionally, of the seven new charter schools that were approved following the adoption of the current strategic plan and which have already opened their doors, six of these schools are designated as Title I schools².



Additionally, many SPCSA-sponsored schools have made efforts to serve a more representative population, and data from annual enrollment counts shows that several schools saw increases of 25% or more in certain student groups.

² To be designated as a Title I school, a school must have at least 40% of students qualify for free or reduced-price lunch.

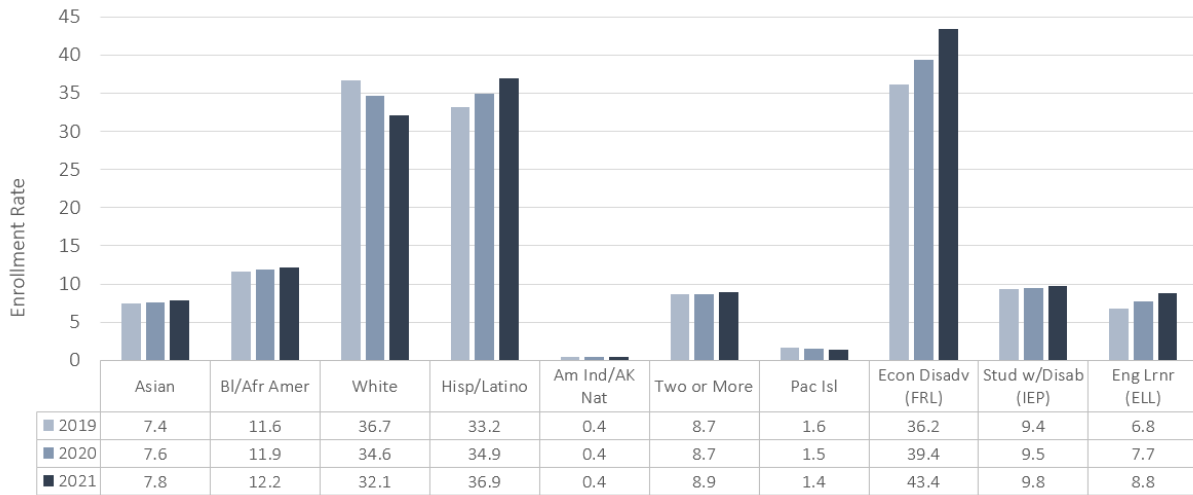
≥ 25% Percent Change from 2020 to 2021

FRL			
School	2020 FRL	2021 FRL	% Change
CASLV Nellis AFB	16.5	29.6	79.3
CASLV Tamarus	17.3	30.3	75.1
CASLV Sandy Ridge	16.3	28.0	71.7
Learning Bridge	5.1	8.7	70.5
CASLV Windmill	17.5	28.7	64.0
CASLV Eastgate	24.6	38.6	56.9
Signature Prep	41.8	64.4	54.0
Amplus Rainbow	27.1	41.6	53.5
Amplus Durango	23.1	31.7	37.2
Elko Institute	30.5	41.8	37.0
Imagine Mtn View	27.4	36.0	31.3
Doral Cactus	14.1	18.5	31.2
NSHS Henderson	18.1	23.2	28.1

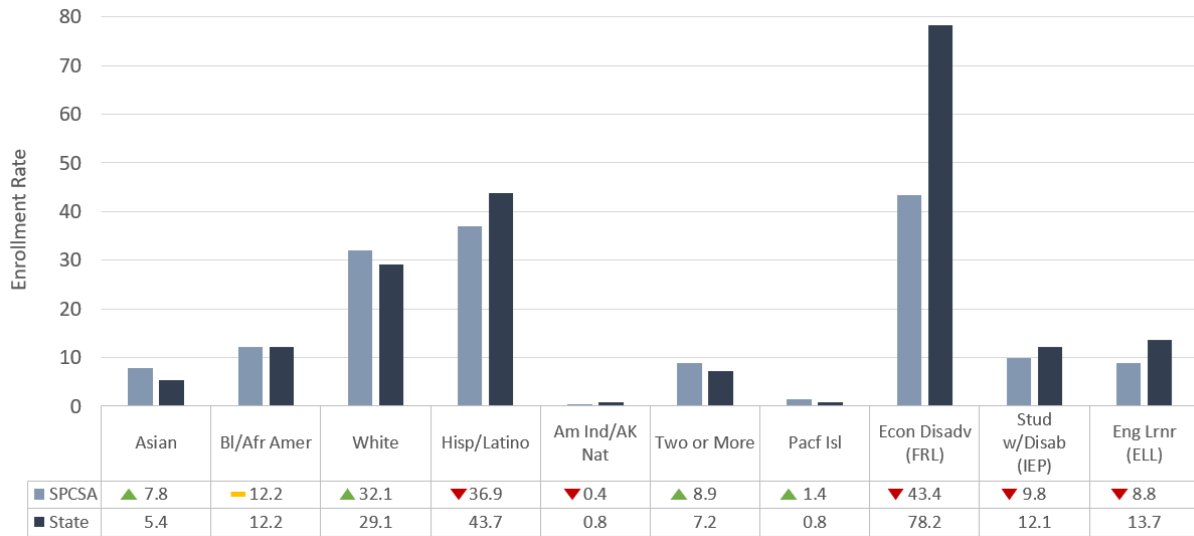
IEP			
School	2020 IEP	2021 IEP	% Change
Leadership Acad	5.2	8.3	59.6
GALS	11.4	17.4	52.6
Equipo Acad	5.5	7.8	41.8
CASLV Windmill	4.4	5.8	31.8

ELL			
School	2020 ELL	2021 ELL	% Change
Amplus Rainbow	7.2	17.9	148.6
Nevada Virtual Acad	2.1	3.7	76.1
Doral Fire Mesa	2.3	4.0	73.9
Doral Red Rock	2.3	3.7	60.8
Doral Cactus	2.1	3.0	42.8
Amplus Durango	3.7	5.1	37.8
Somerset Skye Canyon	2.0	2.7	35.0
Somerset Stephanie	3.1	4.1	32.2
Pinecrest Horizon	1.4	1.8	28.5

Due to the efforts of the Authority and sponsored schools, the SPCSA has seen steady progress in serving a more representative population. This progress is particularly noticeable when considering that of the approximately 55,000 charter school seats statewide, the majority are filled by students who remain at their school from one year to the next. Changes in population are driven by new schools and expansions authorized by the SPCSA and when vacant seats are created due to student transfers and matriculation out of a school. The graph below shows changes in the SPCSA’s student population over the last three years.



Despite this progress, as of October 1, 2021, the SPCSA overall continues to serve a disproportionately low percentage of students in three student groups: students qualifying for free and reduced-price lunch (FRL), students with disabilities (IEP), and students identified as English Learners (ELL).



Ultimately, we understand that changing the demographics of students served will take time because many students will choose to remain in their school from one year to the next. Therefore, a multi-pronged approach with a variety of strategies will help to increase the pace of progress.

APPENDIX B: Additional Context regarding the Community Eligibility Provision (CEP)

According to the U.S. Department of Agriculture, “the Community Eligibility Provision (CEP) is a non-pricing meal service option for schools and school districts in low-income areas. CEP allows the nation’s highest poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students without collecting household applications. Instead, schools that adopt CEP are reimbursed using a formula based on the percentage of students categorically eligible for free meals based on their participation in other specific means-tested programs, such as the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF).” Importantly, schools that participate in CEP do not collect household applications to determine eligibility for free and reduced-price meals because all students are eligible to receive free meals. Therefore, these schools are reimbursed for meals based on 1.6 times the percentage of students that qualify for free and reduced-price lunch without the use of household applications. Additionally, since every child at a CEP school has access to a free meal, for the purposes of annual student enrollment counts, schools that participate in CEP are counted as 100% free and reduced-price lunch (FRL) and reported by the Nevada Department of Education as >95% FRL.

To be eligible to participate in CEP, a school must have at least 40% of students who are certified for free meals without the use of household applications. This means that 40% of students must qualify for free lunch based on programs such as Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF). This is sometimes referred to students that are qualified for free meals through “direct certification.” Currently, the SPCSA has 11 school campuses that participate in CEP. Additional information regarding the Community Eligibility Provision can be found here:

https://doe.nv.gov/uploadedFiles/ndedoenvgov/content/Boards_Commissions_Councils/Title_I_Committee/2019/May/Item8Community_Eligibility_Provision.pdf

APPENDIX C: Complete list of Sponsored Schools

School Campus	2021-22 FRL Rate	Change in FRL Rate from 2020-21 to 2021-22 (positive values indicate an increase in FRL Rate, negative values indicate a decrease in FRL Rate)	Comparison District	Comparison District FRL Rate
Alpine Academy	8.1	-40.8	Washoe	45.4
Amplus Durango	31.7	37.2	Clark	64.0*
Amplus Rainbow	41.6	53.5	Clark	64.0*
Beacon Academy	67.0	2.9	Clark	64.0*
CASLV Centennial	31.4	24.6	Clark	64.0*
CASLV Eastgate	38.6	56.9	Clark	64.0*
CASLV Nellis AFB	29.6	79.3	Clark	64.0*
CASLV Sandy Ridge	28.0	71.7	Clark	64.0*
CASLV Tamarus	30.3	75.1	Clark	64.0*
CASLV Windmill	28.7	64.0	Clark	64.0*
CIVICA	71.1	N/A	Clark	64.0*
Discovery Hillpointe	16.9	N/A	Clark	64.0*
Discovery Sandhill	31.6	N/A	Clark	64.0*
Doral Cactus	18.5	31.2	Clark	64.0*
Doral Fire Mesa	36.9	19.0	Clark	64.0*
Doral Northern Nevada	6.4	-22.8	Washoe	45.4
Doral Pebble	24.4	-0.8	Clark	64.0*
Doral Red Rock	24.0	21.8	Clark	64.0*
Doral Saddle	30.7	12.8	Clark	64.0*
DP Agassi ES	>95.0	0.0	Clark	64.0*
DP Agassi HS	>95.0	0.0	Clark	64.0*
DP Agassi MS	>95.0	0.0	Clark	64.0*
Elko Institute	41.8	37	Elko	34
Equipo Academy	>95.0	0.0	Clark	64.0*
Explore Academy	46.3	12.6	Clark	64.0*
Founders Academy	23.7	-2.0	Clark	64.0*
Freedom Class Academy	39.8	15.3	Clark	64.0*
Futuro Academy	>95.0	0.0	Clark	64.0*
GALS	>95.0	0.0	Clark	64.0*
Honors Academy	12.7	7.6	Washoe	45.4
Imagine Mountain View	36.0	31.3	Clark	64.0*
Leadership Academy	25.4	19.8	State	64.0*
Learning Bridge	8.7	70.5	White Pine	64.0*
Legacy Cadence	49.6	4.8	Clark	64.0*
Legacy North Valley	54.5	19.2	Clark	64.0*
Legacy Southwest	40.5	-10.3	Clark	64.0*
Mater Bonanza	>95.0	0.0	Clark	64.0*
Mater East Las Vegas	>95.0	0.0	Clark	64.0*
Mater Mountain Vista	>95.0	0.0	Clark	64.0*
Mater Northern Nevada	100.0	0.0	Washoe	45.4
Nevada Connections Academy	46.8	0.2	State	64.0*
Nevada Prep	>95.0	0.0	Clark	64.0*
Nevada Rise	>95.0	0.0	Clark	64.0*
Nevada Virtual Academy	56.7	-9.2	State	64.0*
NSHS Downtown	70.3	-16.2	Clark	64.0*
NSHS Downtown Henderson	13.2	-5.7	Clark	64.0*

School Campus	2021-22 FRL Rate	Change in FRL Rate from 2020-21 to 2021-22 (positive values indicate an increase in FRL Rate, negative values indicate a decrease in FRL Rate)	Comparison District	Comparison District FRL Rate
NSHS Henderson	23.2	28.1	Clark	64.0*
NSHS Meadowood	14.0	19.6	Washoe	45.4
NSHS Northwest	26.2	-29.7	Clark	64.0*
NSHS Southwest	41.3	-6.9	Clark	64.0*
NSHS Summerlin	38.6	-5.1	Clark	64.0*
NSHS Sunrise	56.2	1.0	Clark	64.0*
Oasis Academy	28.4	5.5	Churchill	64.0*
Pinecrest Cadence	32.3	12.1	Clark	64.0*
Pinecrest Horizon	32.3	0.0	Clark	64.0*
Pinecrest Inspirada	13.3	6.4	Clark	64.0*
Pinecrest Northern Nevada	14.6	-15.1	Washoe	45.4
Pinecrest Sloan Canyon	17.3	-1.1	Clark	64.0*
Pinecrest St Rose	28.0	7.6	Clark	64.0*
Quest Northwest	>95.0	0.0	Clark	64.0*
Signature Prep	64.4	54.0	Clark	64.0*
Silver Sands	37.8	11.8	Clark	64.0*
SLAM	58.3	11.6	Clark	64.0*
Somerset Aliante	23.4	6.3	Clark	64.0*
Somerset Lone Mountain	24.2	-0.4	Clark	64.0*
Somerset Losee	45.1	14.4	Clark	64.0*
Somerset North Las Vegas	47.1	8.2	Clark	64.0*
Somerset Sky Pointe	20.7	9.5	Clark	64.0*
Somerset Skye Canyon	15.0	16.2	Clark	64.0*
Somerset Stephanie	30.6	-8.1	Clark	64.0*
TEACH Las Vegas	93.7	N/A	Clark	64.0*

* indicates rate is higher than 64%.