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ACTION MEMORANDUM

TO: SPCSA Authority Board
FROM: Mark Modrcin, Director of Authorizing, SPCSA
Danny Peltier, Management Analyst III, SPCSA
SUBJECT: **Coral Academy of Science Las Vegas – Charter Amendment Request to Eliminate and Reconfigure Grades Without Affecting Enrollment**
DATE: October 7, 2022

Summary of Request and Recommendation

Coral Academy of Science Las Vegas (CASLV) has submitted an amendment application requesting that the State Public Charter School Authority (SPCSA) grant a Good Cause Exemption and approve the school to eliminate grades 6th and 7th at the Eastgate campus and move those students to either the Windmill or Cadence Campus. If approved, these changes will not affect the enrollment caps at any CASLV campuses, nor will it force any current CASLV students out of the network due to lack of seats.

SPCSA staff has reviewed the application and recommends that the Authority grant the Good Cause Exemption and conditionally approve the amendment request. A proposed motion along with conditions can be found on page of 5 this memo.

Background and Overview of the Amendment

CASLV is a STEM-focused, college-prep public charter school that serves students in grades K-12 across seven campuses. The mission of CASLV is to provide a safe, rigorous college preparatory environment that promotes social responsibility and a culturally diverse community dedicated to becoming lifelong learners bound for success. As of the 2021 Validation Day, CASLV had 3,781 students across six campuses. CASLV also opened its Cadence campus at the start of the 2022-2023 school year and those enrollment numbers are not yet available.

According to the amendment application, CASLV's Eastgate Campus is requesting to reduce the number of grades served. Currently, Eastgate serves grades K-7. Starting in 2023-2024, CASLV requests to only serve grades K-5 and add an additional classroom section to the remaining grades so as not to affect the enrollment cap. The 5th and 6th grade students at the Eastgate campus will be offered the option to attend either the Windmill or Cadence campuses starting in the 2023-2024 school year. As previously stated, CASLV has sufficient space to ensure that these students will have a seat within the network if this grade configuration change is approved.

Also, according to the amendment application, the reasons for the change in grade configuration were:

1. With the decreasing amount of qualified teaching candidates, it would be easier to recruit elementary teachers for the Eastgate campus. The Eastgate campus has had a difficult time recruiting middle school teachers.
2. The master teachers are overwhelmingly employed in CALSV elementary grades at the Eastgate campus. The campus has had more success in improving and training its elementary teachers because of this.
3. CASLV has always had greater waitlists for its elementary grades at Eastgate, and with a grade contraction, the Eastgate Campus will be able to serve more K-5 students. By contracting grades, Eastgate Campus will create more sections for those families.

The amendment application initially described a process for determining which campus affected students from the Eastgate campus would attend. The written application explained that during the second half of the 2022-2023 school year (and each school year thereafter), 5th grade and 6th grade families would receive a Google Form survey asking which campus (Windmill or Cadence) their student would prefer to attend for sixth grade. Windmill would have between 70 to 75 spots available, which is the maximum number of students allowable under the SPCSA's enrollment cap. The Cadence campus would accept students who chose that campus in the Google Form survey and the remaining students that the Windmill campus did not have room for. The Cadence campus currently is below its enrollment cap and has the capacity to accept however many students it needs.

After discussion with SPCSA staff, it was determined that a modification would be made to what was explained in the written application, and CALSV would modify its current lottery policy to include an in-network lottery in the event more students chose either the Windmill campus or Cadence campus than there were seats available.

As such, if approved, the 2022-2023 Eastgate 5th graders and 6th graders and Eastgate 5th graders in the years following will have the option to apply to attend the Windmill or Cadence campuses during the CASLV's enrollment window. After the enrollment window closes, CASLV will determine if either the Windmill or Cadence campus has more students intending to enroll from Eastgate than seats available. If this does occur, these students from the Eastgate campus will be entered into an in-network lottery to determine which campus they will attend.

The amendment application noted that the Cadence campus is a three-mile drive from the Eastgate campus, and the Windmill campus is a four mile drive from the Eastgate campus, so

overall travel distances were not dramatically different for families comparatively. The application also stated that families of the Eastgate campus were supportive of the change because it would allow the Eastgate campus to be more focused on the K-5 grades.¹

As stated previously, the changes to the Eastgate, Cadence, and Windmill campuses will not affect the approved enrollment caps for any campuses, nor would the change affect the overall mission or vision of the campuses.

Legal Authority and Requirements Related to Amendment Requests

Existing charter schools that are sponsored by the SPCSA may submit a charter school contract amendment application to the SPCSA – which is reviewed by SPCSA staff and presented for SPCSA Board action – in order to, among other things, increase enrollment, add grade levels above and beyond what the charter school is approved to serve, or add a new campus. Only those existing charter schools that are meeting expectations in regard to academics (under both the Department of Education’s Nevada School Performance Framework -- the “Star Ratings” -- and the SPCSA’s Academic Performance Framework), are compliant in regard to the SPCSA’s Organizational Framework, and are fiscally sound may be approved for expansion. Furthermore, the academic, organizational, and financial performance of other charter schools that contract with the same Charter Management Organization or Educational Management Organization is taken into account when reviewing an expansion application².

Applicant Eligibility

When reviewing an amendment application, SPCSA staff reviews the academic, financial and organizational performance of the applicant charter school. Academically, the current Nevada School Performance Framework (NSPF) Report Card for all but one program (Nellis – ES) is at or above the 3-star level. As a result, the Coral Nellis ES program is currently operating under a Notice of Concern. It is important to note, however, that the CASLV network receives 11 annual ratings under the NSPF based on the current campus configurations. As noted on pages 9 and 10 of this memo, no CASLV campus has earned lower than a 4-star rating under the NSPF with the exception of the Nellis campus in 2019. This campus was previously rated as a 4-star school in 2018, and has a more transient population than other CASLV charter schools given its location on an air force base. Despite the active Notice of Concern at the Nellis-ES campus, SPCSA staff finds overwhelming evidence that the academic programs at CASLV have been performing at

¹ The SPCSA has received public comment from the parent of one Coral Eastgate student who indicated they had concerns with the proposal to change Eastgate to a K-5 school and move 6th and 7th graders to the Windmill or Cadence Campus.

² There are limited exceptions to these eligibility requirements for those charter schools that have been approved by the State Board of Education and the SPCSA Board to be rated under Nevada’s Alternative Performance Framework.

high levels since the inception of the NSPF ratings. A table summarizing the academic performance of CASLV schools is provided on pages 9 and 10 of this memo³.

Additionally, the school earned 100 points (out of 100) under the SPCSA Organizational Performance Framework for the 2020 – 21 school year as approved by the Authority on January 28, 2022. As such, SPCSA staff finds the school to be ‘Meeting Standards.’ CASLV has also been found to ‘Meet the Standards’ on the most recent 2021 SPCSA Financial Performance Framework.

Given the historic academic, organizational, and financial performance under SPCSA Performance Frameworks, SPCSA staff finds Coral Academy of Science Las Vegas to be eligible for this amendment request.

Analysis and Staff Recommendation

During the review, SPCSA staff had concerns about the equity of using a first-come, first-served form to determine which students would attend Windmill or Cadence campuses. SPCSA staff met with the CASLV team to discuss these concerns and understand why CASLV did not propose a lottery for the Eastgate students in the event more students chose either Windmill or Cadence than what those campuses had room for. During the discussion, the CASLV explained why they chose the Google form format and noted that they did not want families at the Eastgate campus to think that by entering a lottery for either the Windmill or Cadence campuses, they may not be offered a spot in either. Although this was a reasonable concern, SPCSA staff believe implementing an in-network lottery for Eastgate students would be the most equitable and transparent way to determine the matriculation of students to the Windmill and Cadence campuses for the 2023-2024 school year and beyond. Additionally, internal matriculation patterns and lotteries are already contemplated by the school’s enrollment policy. CASLV staff agreed with this assessment and will work to adopt an updated lottery to reflect the grade configuration change in its matriculation order and note that in internal network lottery may be required depending on student and family demand. SPCSA staff will continue to work with CASLV as they update this policy.

Other than the matriculation of students, SPCSA staff found the justification for the grade reconfiguration to be reasonable. As previously noted, CASLV has been in communication with families regarding the change, and the distance difference for the Cadence and Windmill campuses was three and four miles respectively. Allowing the Eastgate campus to focus more on the K-5 grades, and also adding grade level sections to meet the demand was also rational.

The grade reconfiguration will also not affect the caps for any of the campuses. As noted below, the Eastgate’s enrollment cap will remain at 640, Windmill’s enrollment cap will remain at 383, and Cadence’s enrollment cap will remain at 1850. With Windmill having capacity to accept

³ Due to COVID-19, the Nevada Department of Education (NDE) applied for and was granted a 2019 – 20 school year waiver from the US Department of Education for certain assessment, accountability, school identification, and reporting requirements established by the Every Student Succeeds Act (ESSA). Accordingly, for the 2019 – 20 school year, Nevada statewide assessments were not administered and the NDE did not calculate Nevada School Performance Framework (NSPF) school ratings.

around 70 students due to the matriculation of 7th grade students, and the Cadence campus below its approved cap, staff did not find issue with the plan as proposed with regard to the caps remaining unchanged at any of the CASLV campuses affected by this amendment proposal. Therefore, SPCSA staff is supportive of the requested amendment and recommends the Authority approve with the condition included in the motion below.

Proposed Motion: Grant the Good Cause Exemption Request and approve the amendment request of CASLV to change the grade configuration of the Eastgate campus to K – 5 starting in the 2023 – 24 school year on the condition that the school adopt an updated lottery policy to reflect this grade configuration change in its campus matriculation order, noting that an internal network lottery may be required depending on student and family preferences.

If approved, the enrollment caps for each Coral Academy campus will be as follows for the remainder of the charter term:

School Year	2022-23	2023-24	2024-25
Centennial Hills Campus			
Grade Levels	K-8	K-8	K-8
Enrollment	647	647	647
Eastgate Campus			
Grade Levels	K-7	K-5	K-5
Enrollment	640	640	640
Nellis AFB Campus			
Grade Levels	PK-8	PK-8	PK-8
Enrollment	885	885	885
Sandy Ridge Campus			
Grade Levels	8-12	8-12	8-12
Enrollment	835	835	835
Tamarus Campus			
Grade Levels	K-4	K-4	K-4
Enrollment	405	405	405
Windmill Campus			
Grade Levels	5-7	5-7	5-7
Enrollment	383	383	383
Cadence Campus			
Grade Levels	K-8	K-9	K-10
Enrollment	1850	1850	1850
Total Enrollment	5645	5645	5645

The current, approved, enrollment caps for each Coral Academy campus are as follows:

School Year	2022-23	2023-24	2024-25
Centennial Hills Campus			
Grade Levels	K-8	K-8	K-8

Enrollment	647	647	647
Eastgate Campus			
Grade Levels	K-7	K-7	K-7
Enrollment	640	640	640
Nellis AFB Campus			
Grade Levels	PK-8	PK-8	PK-8
Enrollment	885	885	885
Sandy Ridge Campus			
Grade Levels	8-12	8-12	8-12
Enrollment	835	835	835
Tamarus Campus			
Grade Levels	K-4	K-4	K-4
Enrollment	405	405	405
Windmill Campus			
Grade Levels	5-7	5-7	5-7
Enrollment	383	383	383
Cadence Campus			
Grade Levels	K-8	K-9	K-10
Enrollment	1850	1850	1850
Total Enrollment	5645	5645	5645

School Demographics change since 2017 – Coral Academy

Coral Centennial Hills

Year	Enrollment	A	B	C	H	I	M	P	IEP	ELL	FRL
17-18	682	11.3%	12.5%	46.6%	19.2%	0.3%	9.2%	0.9%	8.2%	4.3%	10.1%
18-19	633	12.8%	10.9%	43.9%	22.3%	0.3%	8.5%	1.3%	7.7%	3.5%	14.4%
19-20	647	13.0%	8.7%	42.8%	24.3%	0.5%	9.7%	1.1%	7.4%	3.7%	25.3%
20-21	684	11.8%	8.4%	40.4%	26.9%	0.4%	10.5%	1.3%	7.3%	2.1%	25.2%
21-22	651	10.5%	8.4%	41.3%	27.3%	0.3%	10.5%	1.3%	5.5%	<5%	31.4%

Coral Eastgate

Year	Enrollment	A	B	C	H	I	M	P	IEP	ELL	FRL
17-18	-	-	-	-	-	-	-	-	-	-	-
18-19	652	21.3%	9.2%	37.7%	19.6%	0.2%	9.8%	2.1%	6.1%	0.8%	21.0%
19-20	640	19.8%	7.3%	36.7%	22.7%	0.2%	11.3%	2.0%	6.4%	3.9%	26.4%
20-21	641	21.9%	6.5%	33.3%	24.8%	0.1%	10.9%	2.1%	7.0%	3.1%	24.6%
21-22	637	24.6%	6.4%	29.6%	25.5%	0.3%	10.8%	2.5%	8.6%	<5%	38.6%

Coral Nellis

Year	Enrollment	A	B	C	H	I	M	P	IEP	ELL	FRL
17-18	722	3.7%	13.4%	49.4%	18.4%	0.6%	10.5%	3.9%	6.1%	*	29.8%
18-19	791	3.2%	14.0%	45.3%	21.5%	0.9%	10.7%	4.4%	8.6%	1.3%	17.7%
19-20	874	3.1%	14.5%	45.2%	23.7%	0.3%	9.5%	3.7%	9.2%	*	23.8%
20-21	876	4.3%	15.1%	40.2%	25.9%	0.5%	11.6%	2.0%	8.4%	*	16.5%
21-22	860	4.1%	16.5%	37.3%	28.1%	0.4%	12.0%	1.2%	7.9%	*	29.6%

Coral Sandy Ridge

Year	Enrollment	A	B	C	H	I	M	P	IEP	ELL	FRL
17-18	817	23.1%	6.5%	43.3%	15.8%	0.7%	8.7%	1.8%	3.4%	2.2%	5.9%

18-19	809	22.5%	6.3%	41.4%	16.4%	0.7%	10.6%	2.0%	4.1%	2.1%	10.0%
19-20	846	25.5%	5.7%	38.7%	16.3%	0.4%	11.1%	2.4%	3.5%	2.1%	13.8%
20-21	860	23.6%	6.2%	37.9%	18.1%	0.3%	11.5%	2.2%	4.1%	2.7%	16.3%
21-22	842	25.6%	6.5%	37.2%	16.6%	0.1%	11.6%	2.1%	<5%	<5%	28.0%

Coral Tamarus

Year	Enrollment	A	B	C	H	I	M	P	IEP	ELL	FRL
17-18	382	28.3%	4.2%	42.4%	13.6%	0.3%	10.5%	0.8%	4.2%	10.5%	9.7%
18-19	394	28.4%	4.8%	40.6%	13.5%	0.0%	11.9%	0.8%	3.6%	7.9%	11.2%
19-20	394	31.7%	6.1%	35.5%	15.2%	0.0%	10.2%	1.3%	6.1%	9.6%	14.5%
20-21	420	28.8%	7.3%	35.0%	15.7%	0.0%	11.4%	1.6%	7.8%	8.8%	17.3%
21-22	395	29.1%	7.8%	31.1%	17.4%	0.0%	12.9%	1.5%	6.5%	8.8%	30.3%

Coral Windmill

Year	Enrollment	A	B	C	H	I	M	P	IEP	ELL	FRL
17-18	399	29.1%	3.5%	35.8%	13.3%	1.0%	16.0%	1.3%	4.0%	5.0%	4.8%
18-19	403	30.8%	4.2%	39.0%	11.9%	0.5%	11.9%	1.7%	2.5%	4.2%	11.4%
19-20	400	32.8%	3.5%	36.8%	13.8%	0.5%	12.3%	0.5%	3.5%	3.0%	16.0%
20-21	404	27.9%	5.6%	38.3%	15.0%	0.0%	11.8%	0.9%	4.4%	4.9%	17.5%
21-22	396	27.7%	5.3%	37.6%	15.4%	0.2%	12.3%	1.2%	5.8%	5.0%	28.7%

Coral Cadence – Data Not Available as it opened for the 2022-2023 School Year

A – Asian

B – Black

C – Caucasian

H – Hispanic

I – American Indian/Alaskan Native

M – Two or more races

P – Pacific Islander

IEP – Individualized Education Plan – A student with a disability/special education student

ELL – English Language Learner

FRL – A student who qualifies for Free or Reduced-Price Lunch

Coral Academy Charter School Financial Performance

Year	Rating
2019 – 2020	Meets the Standard
2020 – 2021	Meets the Standard

Coral Academy Charter School Organizational Performance

Year	Rating
2019 – 2020	Meets the Standard
2020 – 2021	Meets the Standard

Coral Academy Academic Performance

Year	Rating		
2021 ⁴	Centennial Hills – ES: 4-star	Centennial Hills – MS: 5-star	Sandy Ridge – HS: 5-star
	Eastgate – ES: 4-star	Eastgate – MS: 5-star	
	Nellis – ES: 2-star	Nellis – MS: 5-star	
	Tamarus – ES: Not Rated	Sandy Ridge – MS: 5-star	
	Windmill – ES: 4-star	Windmill – MS: 5-star	
2020 ⁵	Centennial Hills – ES: 4-star	Centennial Hills – MS: 5-star	Sandy Ridge – HS: 5-star
	Eastgate – ES: 4-star	Eastgate – MS: 5-star	
	Nellis – ES: 2-star	Nellis – MS: 5-star	
	Tamarus – ES: Not Rated	Sandy Ridge – MS: 5-star	
	Windmill – ES: 4-star	Windmill – MS: 5-star	
	Centennial Hills – ES: 4-star	Centennial Hills – MS: 5-star	
	Eastgate – ES: 4-star	Eastgate – MS: 5-star	

⁴ Due to COVID-19, the Nevada Department of Education (NDE) applied for and was granted a 2020 – 21 school year waiver from the US Department of Education for certain requirements established by the Every Student Succeeds Act (ESSA). Nevada statewide assessments were administered in the 2020 – 21 school year, but the NDE did not calculate Nevada School Performance Framework (NSPF) school ratings for the 2020 – 21 school year.

⁵ Due to COVID-19, the Nevada Department of Education (NDE) applied for and was granted a 2019 – 20 school year waiver from the US Department of Education for certain assessment, accountability, school identification, and reporting requirements established by the Every Student Succeeds Act (ESSA). Accordingly, for the 2019 – 20 school year, Nevada statewide assessments were not administered and the NDE did not calculate Nevada School Performance Framework (NSPF) school ratings.

2019	Nellis – ES: 2-star Tamarus – ES: Not Rated Windmill – ES: 4-star	Nellis – MS: 5-star Sandy Ridge – MS: 5-star Windmill – MS: 5-star	Sandy Ridge – HS: 5-star
2018	Centennial Hills – ES: 4-star Nellis – ES: 4-star Tamarus – ES: Not Rated Windmill – ES: 5-star	Sandy Ridge – MS: 5-star	Sandy Ridge – HS: 5-star