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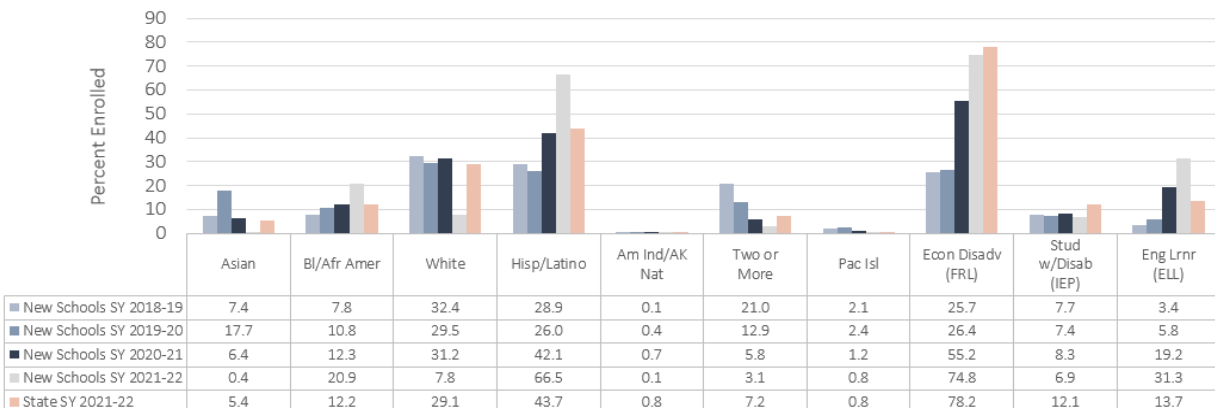
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BRIEFING MEMORANDUM

TO: SPCSA Board
FROM: Rebecca Feiden, Executive Director
SUBJECT: Development of Recruitment and Enrollment Plans
DATE: March 4, 2022

Background

In 2019, the State Public Charter School Authority (SPCSA) adopted a five-year [strategic plan](#) that centers 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. With regard to the third goal, 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.



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.

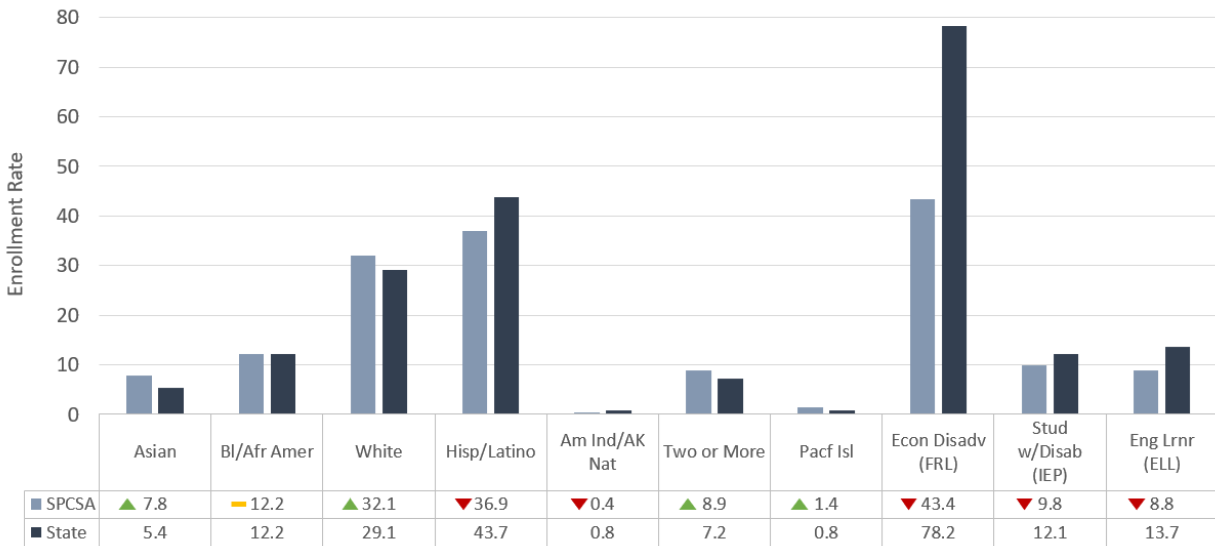
≥ 25% Percent Change from 2020 to 2021

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

Despite significant 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).



Over the last two years, the SPCSA has adopted several strategies for addressing these 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.

While these strategies have been impactful and are expected to continue, requiring certain schools to develop and submit a recruitment and enrollment plan presents an additional tool that can be used to accomplish this goal.

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 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 compared with the local school district and zoned, neighborhood school for the community in which the school 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.

Additional Considerations

While in concept, requiring certain schools to develop and submit a plan to recruit and enroll a representative population is straightforward, there are many nuances to selecting which schools would be required to submit plans. In particular, questions have been raised about the Community Eligible Provision and how it may impact any analysis.

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

Possible Approaches for Identifying 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. 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 proposed approach:

- Compare each school's FRL rate to the local school district.
- For statewide virtual schools, compare the school's FRL rate to the statewide rate.
- For sponsored schools and school districts that participate in CEP or have an FRL rate over 64%, an FRL rate of 64% would be used for this comparison¹.

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

- Identify the 25% of schools that have the most significant gap in FRL rate, when compared to the local school district.
- In recognition of progress that schools are making, remove from the list any schools 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 anticipate that approximately ten to fifteen school campuses, out of the 70 schools campuses currently overseen by the SPCSA, would be identified and recommended to the Authority to develop and submit a recruitment and enrollment plan with specific strategies to recruit and enroll a population that is comparable to their local community.

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).