

Charter School Application Report

Strong Start Academy Elementary School

Recommendation for the Resubmitted Summer 2021 Charter Application Cycle

General Information

Proposed Name	Strong Start Academy Elementary School
Proposed EMO/CMO	None
Proposed Mission	Strong Start Academy Elementary School is a culturally diverse learning community that prepares children to excel academically and have a positive impact on an increasingly evolving and global society.
Proposed Grade Configuration	Opening Year: Kindergarten – 2 nd Grade Full Scale: Kindergarten – 5 th Grade
Proposed Opening	August 2022
Proposed Location	Temporary location for first year: Three facilities <ul style="list-style-type: none"> - 1617 Alta Drive - 700 Twin Lakes Drive - Bonanza & Wardell (exact address TBD)
Zip Codes to be Served	89101, 89102, 89104, 89106, 89107, 89108, and 89110

Process/Key Dates for Strong Start Academy Elementary School

- March 13, 2021 – Notice of Intent is received
- April 12, 2021 – New Charter Application Training
- July 15, 2021 – Application is received
- September 16, 2021 – Clarifying Questions sent to applicant; responses received within 3 business days
- October 5, 2021 - Capacity Interview is conducted¹
- November 5, 2021 – Authority denies initial application
- December 15, 2021 – Resubmitted application is received by the Authority
- January 12, 2022 – SPCSA staff discussed resubmission with the applicant team
- January 28, 2022 – Resubmission recommendation is presented to the Authority

¹ The Strong Start Academy Elementary School capacity interview was conducted virtually as a result of the ongoing COVID-19 pandemic and space limitations within the SPCSA’s offices.

Planned Enrollment Chart

	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28
K	60	60	60	60	60	60
1	60	60	60	60	60	60
2	60	60	60	60	60	60
3		60	60	60	60	60
4			60	60	60	60
5				60	60	60
6						
7						
8						
9						
10						
11						
12						
Total	180	240	300	360	360	360

Executive Summary, Process and Recommendation

Upon receipt of a charter application, SPCSA staff reviews the submission for completion and ADA compliance. Should an application be deemed complete, it is assigned to a formal review team and moves to the independent review phase. Members of the review team read and rate each application independently and compile a list of clarifying questions in advance of the capacity interview in an effort to gather additional detail and information about the application prior to the interview. After the capacity interview is conducted, review team members rerate each section of the application against the rubric before finalizing a recommendation.

During the November 5, 2021 Authority meeting, SPCSA staff presented the findings of the initial review team and SPCSA staff for the Strong Start Academy charter application which was submitted during the 2021 Summer Application Cycle. The initial application was found to exhibit shortcomings within three of the four components of the submitted application. The review team and SPCSA staff found that while the *Meeting the Need* section met the standard, the proposed *Academic, Operations* and *Financial* sections did not meet standards as outlined in the charter application rubric. The Authority voted on November 5, 2021 to deny the Strong Start Academy charter application.

A second review team comprised of SPCSA staff reviewed the resubmitted Strong Start Academy application after it was received on December 15, 2021. The review team approached rating the resubmission with two primary concentrations:

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

Upon resubmission, the review team determined that several of the deficiencies within the original application had been addressed, and the ratings against the charter application rubric reflect

these changes. Most notably, the applicant team was able to articulate a clear vision for the proposed model as well as demonstrate that the key features of the proposed school can be implemented coherently together. The resubmission included additional details regarding the proposed services from key vendors, namely TNTP and Dual Language education of New Mexico, which provided a detailed overview of their proposed scope of services. The applicant also provided a modified incubation year plan which reflected reasonable assignment of key milestones and tasks to be completed. Finally, the resubmission included a modified financial plan that provided clarity that the school could remain financially viable given the work to be assigned to aforementioned vendors, ancillary services, and the proposed staffing model. This progress resulted in the *Academic* and *Financial* sections being rated as 'Meets the Standard'.

Despite this progress, the review team find that the *Operations* section approaches the standard as outlined in the charter application rubric. Questions remain regarding student demand for the school. Evidence is provided, but it is not clear if this represents a significant percentage of first year enrollment from the intended community. Additionally, the resubmission notes that transportation will be provided between incubation year sites during Year 1 to support families and prevent barriers to access, but insufficient information is included to confirm that the school has capacity and concrete plans to implement this feature of the proposal. Finally, the applicant notified the SPCSA in early January that the proposed Executive Director had decided not to continue in that role for personal reasons, but intended to remain engaged as a board member. While the Committee to Form had already identified a new Executive Director and information provided indicates that this individual is qualified, concerns remain as the application does not contemplate a firm timeline for hiring this newly identified Executive Director.

For these reasons, in addition to those described throughout this memo, staff's recommendation is to approve, with conditions, the charter school application for the Strong Start Academy Elementary School.

Proposed motion: Approve the Strong Start Academy charter application as resubmitted during the 2021 Summer Application Cycle, with conditions outlined below, based on a finding that the applicant now meets the requirements contained in NRS 388A.249(3).

1. By March 1, 2022, and before the school begins accepting student applications, provide an updated lottery policy that complies with Nevada Revised Statutes and Nevada Administrative Code.
2. By March 1, 2022, provide evidence that the Executive Director has been hired.
3. By April 30, 2022, provide fully-executed copies of the contracts with key service providers identified in the resubmission: TNTP, Dual Language education of New Mexico (DLNM) and Bambee.
4. Provide evidence that the school is compliant with all statutes and regulations related to student transportation, including NRS 386.815 – 386.840 which comprises a number of requirements for the school to fulfill. SPCSA staff will work with the Nevada Department of Education and the school to monitor progress so that requirements are met approximately 30-days prior to the start of school.
5. By November 30, 2022, provide evidence that a long-term facility has been secured.
6. Complete the SPCSA pre-opening process for new charter schools.

With the exception of #5, all conditions above must be met to staff's satisfaction for the school to open for the 2022 – 23 school year.

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, plus an addendum, as outlined below. 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/

Summary of Application Section Ratings

Rating options for each section are Meets the Standard; Approaches the Standard; Does not Meet the Standard.

Application Section	Initial Rating	Resubmission Rating
Meeting the Need	Meets the Standard	Meets the Standard
Mission and Vision	Meets the Standard	Meets the Standard
Targeted Plan	Meets the Standard	Meets the Standard
Parent and Community Involvement	Approaches the Standard	Approaches the Standard
Academic Plan²	Approaches the Standard	Meets the Standard
Transformational Change	Approaches the Standard	Meets the Standard
Curriculum & Instructional Design	Approaches the Standard	Meets the Standard
Promotion & High School Graduation Requirements	Meets the Standard	Meets the Standard
Driving for Results	Approaches the Standard	Approaches the Standard
At-Risk Students and Special Populations	Approaches the Standard	Meets the Standard
School Structure: Culture	Approaches the Standard	Meets the Standard
School Structure: Student Discipline	Meets the Standard	Meets the Standard
School Structure: Calendar and Schedule	Meets the Standard	Meets the Standard
Operations Plan	Approaches the Standard	Approaches the Standard
Board Governance	Meets the Standard	Meets the Standard
Leadership Team	Meets the Standard	Approaches the Standard
Staffing Plan	Approaches the Standard	Approaches the Standard
Human Resources	Approaches the Standard	Meets the Standard
Student Recruitment and Enrollment	Approaches the Standard	Approaches the Standard
Incubation Year Development	Approaches the Standard	Meets the Standard
Services	Approaches the Standard	Approaches the Standard
Facilities	Meets the Standard	Meets the Standard
Ongoing Operations	Meets the Standard	Meets the Standard
Financial Plan	Approaches the Standard	Meets the Standard

² The Strong Start Academy Elementary School proposal did not contemplate Distance Education, Pre-Kindergarten or Dual Credit Partnerships. Therefore, the corresponding sections of the rubric were not scored.

Meeting the Need Section

The Meeting the Need section within the initial application was rated as ‘Meets the Standard’ and previous strengths were determined to have remained in place upon resubmission and are detailed again below.

Within the resubmission, the applicant provided some additional evidence of concrete, formalized community partnerships, and some clarity was provided regarding community engagement. However, some concerns remain that were not addressed in the resubmission. There is not sufficient evidence of demand for the proposed school from the target zip codes. Additionally, while the application highlights meetings and conversations that have occurred as the application was being developed, and this was confirmed throughout the resubmission process, it was not clear that prospective parents have been actively involved in formulating the proposal. Overall, the additional evidence of solidified partnerships reaffirmed a ‘Meets Standard’ rating for this section upon resubmission.

Areas of Strength

- The application clearly outlines core values and components of the model that can have a positive impact on students’ long-term quality of life, and may also allow the school to achieve stated outcomes.
- The application makes a compelling case that the communities in and around City of Las Vegas Wards one, three and five have a tremendous need for more high-quality schools, citing evidence from the SPCSA Needs Assessment and poverty statistics. Additionally, research is included in the application that supports the plan to provide more high-quality seats in underserved areas.
- The support of the City of Las Vegas is a clear and significant strength of the application, both in terms of providing resources and committing support to the proposed school as a proposed partner. The structure proposed in the bylaws establishes, and will maintain, a strong connection between the proposed school and local government.
- The Committee to Form stated that they plan to continue to reach out to parents and has a plan for doing so by leveraging established relationships. Additionally, the Committee to Form plans to recruit a parent to join the board.
- During the capacity interview, members of the Committee to Form referenced prior work that has been done through ReInvent Las Vegas as an example of community engagement and input that influenced the model. This was reaffirmed during the resubmission process, and this work included a unique assessment of needs within the community, as well as significant data and analysis. According to the Committee to Form, the proposed academic program was constructed in response to these data.

Areas of Concern

- Despite the description, data and information provided regarding the work of ReInvent Las Vegas³, it is not clear that prospective parents of this school have had a direct hand in shaping the proposal. More evidence is needed to conclude that parents, neighborhood and/or community members who are representative of the target population have been directly involved in the development of the plans. Most meetings described in the narrative appear to have focused on the delivery of information to share the committee’s model rather than on the solicitation of feedback and/or input on the proposal.

³ ReInvent Schools Las Vegas (RSLV) was launched by the city of Las Vegas in collaboration with Clark County School District to improve outcomes for the Las Vegas community. More information can be found on their [website](#).

- While the resubmission includes some additional evidence of demand for the proposed school, it is not clear that it originates from the intended communities that the school plans to serve. The applicant has not demonstrated that there is currently sufficient demand from the target zip codes outlined in the application.

Academic Section

The Academic section within the initial application was rated as 'Approaches the Standard'. Previous strengths were determined to have remained in place upon resubmission and are detailed again below.

A few notable improvements were identified in this section within the resubmission. First, the scope of the proposed academic program narrowed so as to focus primarily on implementing a dual language immersion program. The resubmission also provides satisfactory evidence of curricula alignment to the Nevada Academic Content Standards. Additionally, the proposed school now contemplates entering into a contract with Dual Language education of New Mexico (DLeNM) to assist with the implementation of the academic program, including supporting the school during the incubation year to prepare for the first year of operations. The resubmission notes the types of professional development that will be offered to ensure that students requiring interventions or special services are addressed, and the identified services providers appear to possess the requisite expertise and experience deliver professional supports to staff so as to foster strong outcomes for students under this unique model. Lastly, the resubmission provided some additional clarity regarding the school's goals for student behavior, and how progress against these goals will be measured.

While there are some minor concerns with the school's proposed internal goals and how they will be monitored and/or adjusted to student performance, this section was rated as 'Meets the Standard' given the progress highlighted above in a number of subsections.

Areas of Strength

- The application includes a well-defined theory of change and educational strategy that tied to the overall mission and vision of the school. The Committee to Form articulated how they envisioned the school reaching all students, and described how it planned to implement a dual language immersion program with fidelity.
- The Committee to Form was able to explain promotion criteria and how students who are at-risk of retention will be supported. In addition, the application outlines the measures that would be examined in cases where retention is being considered.
- Several board members and advisory committee members are professors with relevant areas of curricular/instructional focus (dual language, etc.), or are current or former educators. These individuals have extensive experience in supporting students and teachers, and can provide the school with additional support within the academic program.
- The application provides clarity on the final curricula choices for the school in core subject areas. Additionally, sufficient evidence is provided for the chosen curricula that it aligns to Nevada Academic Content Standards (NVACS).
- The resubmission includes an emphasis on social emotional learning at an early age to assist students who may have experienced significant and/or cyclical trauma at home. This approach, coupled with dual language immersion, has the potential to have a substantial impact on student mental and physical wellbeing, and ultimately support strong academic outcomes.
- The application proposes that all staff will be involved in monitoring student discipline data in order to ensure that there are not student populations disproportionately impacted by the proposed policies. This has the potential to create buy-in amongst staff. Additionally, reports will be generated and analyzed, and provided to the board on a monthly basis to identify any concerns and prevent any disparity between student groups.
- The proposed calendar appears to meet the minimum of 180 instructional days, while offering an extended day to students. The application notes that the attendance goal is 95% on a daily basis, with chronic absenteeism of less than 3%. The application goes on indicate staff will monitor

student attendance and regularly reinforce the importance of consistent attendance to students and families.

Areas of Concern

- The resubmitted application includes several sets of goals and benchmarks. They appear to be mission-aligned and in most cases, ambitious. However, in some cases, goals are framed in terms of relative performance to CCSD and so while a school meeting these goals would result in a school that is outperforming the CCSD average, without additional targets related to student growth on state assessments, it's not clear that it would lead to a 4- or 5-star school. Additionally, there are also not any student group goals provided in the application, which raises questions given the proposed communities and student populations that the school aims to serve. More information is needed to ensure that the Committee to Form has a robust plan prior to opening, including at the Board level, for monitoring performance to ensure students are on track to achieve proficiency standards and skills mastery.
- While the resubmission provides some data about schools implementing instructional models that have some similar characteristics such as MTSS, the resubmission lacks adequate data from potential model schools of success for the distinguishing features of the proposed model of Strong Start Academy. More information and data would be helpful in understanding how the proposed program may be impactful for students and families.

Operations Section

The Operations section within the initial application was rated as 'Approaches the Standard'. A number of improvements were made within the resubmission. The applicant team provided some helpful information regarding the proposed service provider tasked with assisting the school administration and governing board with back-office services, including human resources support. This is in addition to those service providers previously mentioned in the *Academic* section. The resubmission also provided a revised incubation year plan that is detailed and assigns individuals to key tasks and milestones to occur before the first year of operations.

Key concerns were identified by the review team that prevent this section from being rated as 'Meets the Standard'. First, there is not sufficient evidence in the resubmission to conclude that there is demonstrated demand for the proposed school originating from the primary zip codes the school intends to serve. In addition, the applicant notified the SPCSA in early January that the proposed Executive Director had decided not to continue in that role for personal reasons but intended to remain engaged as a board member. While the Committee to Form had already identified a new Executive Director and information provided indicates that this individual is qualified, concerns remain as the application does not contemplate a firm timeline for hiring this newly identified Executive Director. The resubmission also contemplates providing students and families transportation between sites to alleviate access issues, but there is not sufficient evidence to confirm that the school has capacity and concrete plans to implement this feature of the proposal. Lastly, the review committee remains somewhat concerned by capacity challenges for the administration and staff created by operating across three sites, although the Committee to Form proposed a staffing plan across three sites for year one of operations.

For these reasons, in addition to those further detailed below, this section was rated as 'Approaches the Standard'.

Areas of Strength

- The proposed governing board possesses the necessary qualifications and experience that demonstrate sufficient capacity and expertise to successfully oversee the proposed school. Additionally, the written application articulates a clear and appropriate delineation of authority and working relationship between the governing body and school staff that is reasonable. The board will ensure that the goals for the school are established and reached while the Executive Director will oversee daily operations and how each goal is met. This understanding of responsibilities is likely to ensure effective governance and meaningful oversight.
- During the scenario-based question, the applicant team addressed the possibility that the school encounters staffing and hiring problems throughout the spring of the incubation year. Individuals participated, offered input, and followed the roles and responsibilities as outlined in the narrative. This exercise demonstrated that the applicant team can maintain a working relationship should the school encounter obstacles.
- The revised incubation year plan includes detailed milestones for the remainder of the fiscal year, and the plan matches available capacity for this period of time as the school will employ an Executive Director well before year one of operations. As such, the staffing will enable the school to meet timelines outlined in the plan, and startup expenses are accounted for in the budget and supporting documentation.
- While the final facility for Year one has yet to be solidified, the capacity interview provided important clarity in that the proposed school would be located in a site owned by the City of Las Vegas beginning in year one, and that there is an effort to consolidate the proposed school into one site for year one. As a municipal-owned building, safety and security plans are already in place to

ensure a safe and secure environment for people and property.

Areas of Concern

- In January, the Committee to Form notified SPCSA staff that the proposed Executive Director had decided not to continue in that role for personal reasons but intended to remain engaged as a board member. At that time, the Committee to Form indicated they had already identified a new Executive Director and provided information regarding this individual's qualifications, experience, and past performance. However, this late-stage change raises concerns about readiness given that the application does not contemplate a firm timeline for hiring this newly identified Executive Director.
- Despite some adjustments to the proposed school during the first year of operations, including operating each site with only one grade level, implementing the proposed program across three sites will be challenging given the scope of the school and staff size in year one of operations. Additionally, it may be challenging for the Executive Director to oversee the consistent implementation of such a unique model across three buildings.
- It was confirmed during the resubmission process that current student demand to date for the proposed model was over 100 students for year one, but insufficient evidence was provided to confirm that interest was coming primarily from the targeted zip codes that the school intends to serve. Strategies were discussed about how to fill the seats in both the initial application and resubmission, including the opportunity to partner with pre-kindergarten programs, but more evidence is needed as a result of outreach to confirm that the school is viable and likely to be filled in year one, and that the school will serve the target communities.
- While it is admirable that the school plans to provide transportation between sites to assist families that may have multiple students attending the proposed school, but in different grades, the operations plan does not include a fully-developed transportation plan to ensure that these services are logical and provided in year one.

Financial Section

The Financial section within the initial application was rated as 'Approaches the Standard'. Previous strengths were determined to have remained in place upon resubmission and are detailed again below.

The resubmission included a number of noteworthy improvements to the Financial section, specifically sufficient evidence-based assumptions regarding costs associated with proposed vendors (TNTP, DLeNM, Bambee), confirmation that the staffing structure matches the proposed budget, and that ancillary services are adequately incorporated into projected expenditures. Given this progress, this section within the resubmission was rated as 'Meets the Standard'.

Areas of Strength

- The City of Las Vegas has authorized one million dollars for FY22 to be spent down by the Committee to Form in support of the school prior to opening. Confirmation of these dollars was included in the application, and this represents a sizeable donation that can help offset key planned expenditures while also offering the school significant latitude should multiple unexpected expenses arise.
- The City of Las Vegas is planning to lease any facilities to be used by the proposed school during Year one, as well as any long-term facilities. Assurances during the capacity interview were provided that these will be very reasonable, providing some budgetary relief.
- Upon resubmission, the school level budget priorities are consistent with the proposed model which focuses on providing a dual language immersion program. The academic model appears financially viable as the school intends to scale the program beyond the first year of operations.
- Sufficient detail and specificity of assumptions is provided for essential services to be provided through identified service providers, including TNTP and DLeNM, which are tasked with providing a number of key supports to the proposed administration and teaching staff starting in the incubation year.

Areas of Concern

None

Capacity Interview Summary

Based on the independent and collective review of the application, the review committee conducted a virtual capacity interview of the applicant to assess the capacity to execute the application’s overall plan. The capacity interview for Strong Start Academy Elementary School was conducted on Tuesday, October 5, 2021 and lasted approximately 120-minutes. All members of the Committee to Form attended the interview with one exception. Additionally, four representatives from the City of Las Vegas, the proposed Executive Director, as well as two members of the Advisory Committee attended the capacity interview. Questions during the capacity interview focused primarily on these areas:

Targeted Plan	Staffing Plan
Parent and Community Involvement	Human Resources
Transformational Change	Student Recruitment and Enrollment
Curriculum & Instructional Design	Incubation Year Development
At-Risk Students and Special Populations	Services
Driving for Results	Facilities
Board Governance	Financial Plan

Prior to the capacity interview, the review committee sent the applicant team a list of clarifying questions to provide an additional opportunity for details and information to be presented. These responses were considered by the review team, and were used to better inform the capacity interview.

Lastly, the capacity interview included a scenario-based question that probed the committee to form’s capacity to execute against incubation year milestones.

Meet and Confer

The Strong Start Academy Committee to Form met with SPCSA staff on multiple occasions to discuss the deficiencies identified prior to their resubmission on December 15, 2021. During these meetings, the applicant team asked a number of questions and sought clarity about identified deficiencies.

District Input

Per Assembly Bill 462 (2019), now codified in NRS 388A.249, the SPCSA solicited input from the Clark County School District regarding this application.⁴ The timeline regarding this request for input is below and the response provided by the Clark County School District is attached.

- August 5, 2021 – Memo sent to CCSD soliciting input.
- November 1, 2021 – Written input provided from CCSD to SPCSA.
- November 24, 2021 – Written notification from the SPCSA to CCSD regarding the denial of the original Strong Start Academy charter application.
- January 4, 2022 – Written notification to CCSD confirming that the Strong Start Academy resubmission had been received. The SPCSA provided a tentative timeline for possible action on the Strong Start Academy resubmitted application, and provided CCSD with an opportunity to provide additional input.

⁴ NRS 388A.249(2)(a): “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.”

Appendix (Rubric Detail)

The information below indicates *rubric criteria that the applicant did not substantially meet*.

Meeting the Need

- Parent and Community Involvement

- *Demonstrates clear evidence of the involvement of parents, neighborhood, and/or community members representative of target population in the development of the plan. The application establishes that the local community has helped shape the final proposal.*

Academic Plan

- Driving For Results

- *Internal and mission-specific framework goals are SMART: goals and objectives are specific, measurable, ambitious and attainable, relevant and time bound.*
- *There is a clear process for setting, monitoring and/or revising internal leading indicator academic goals.*

Operations Plan

- Leadership Team

- *If identified, school leadership team resumes demonstrate a range of experience including leadership at a high-performing and/or high-growth school with management responsibilities, experience establishing a high-performing culture with students and staff, and responsibility for significant student achievement gains with target demographics.*
- *If the school leader is not yet identified, the committee to form explains the method by which they will recruit and select a candidate who satisfies the criteria listed in the job description.*
- *Provides a comprehensive plan for coaching, support and evaluation of school leadership.*

- Staffing Plan

- *Appropriately staffed to meet the needs of the expected student population, including special student populations.*
- *Sound understanding of staffing needs necessary for the new-school(s) proposed.*

- Student Recruitment and Enrollment

- *Campaign leverages grassroots, data-driven outreach and recruitment strategies such as door-to-door visits, open houses and forums, and community conversations versus the internet, social media, or other passive tactics which disproportionately benefit more advantaged populations.*
- *Demonstrated interest and intent to enroll commitments by a significant number of parents for Year 1. These forms should include the following information at minimum:*
 - *Parent name and contact information*
 - *Zip code of residency*
 - *Student name(s) and grade levels for the proposed opening year*

- Services

- *Operations plan includes logical plans for all essential and program-specific non-academic services, including, but not limited to:*
 - *Supporting transportation, food service, facilities management, nursing, and purchasing processes, and school safety.*
 - *Staff structure/plan is adequate for the proposed school and aligns with the educational program; lines of authority are clear.*
- *Committee to Form articulates clear metrics and process for evaluating effectiveness of services.*