From:	Heather Goulding Assemblymember
To:	Kurt Thigpen; Janelle Addis; Ivet Aldaba; Rosanne Richards; Victor Salcido; Courtney Stern; Victoria Turner; Melissa Mackedon; SPCSA Public Comment
Cc:	skip.daly@sen.state.nv.us; Angela Taylor Senator; Natha Anderson Assemblymember; Selena La Rue Hatch Assemblymember; Erica P. Roth Assemblymember
Subject:	Opposition to Doral Academy of Northern Nevada (DANN) Request for Charter Contract Amendment (UNR / Academica Expansion)
Date:	Monday, November 2, 2026 8:01:13 AM
Attachments:	October 9, 2026, SPCSA Board Meeting Agenda - Updated.pdf

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Dear SPCSA Members:

We are resubmitting our letter of opposition to Doral Academy of Northern Nevada (DANN)'s request for a charter contract amendment that you will consider during the November SPCSA meeting. Please include our letter with other public comments posted with meeting materials.

As members of the Nevada State Legislature representing Washoe County, we write to convey our opposition to the Request for Amendment submitted by Academica, a Florida-based[1] Educational Management Organization (EMO), and Doral Academy of Northern Nevada (DANN). DANN seeks approval to construct a $50 million to $55 million, 100,000-square-foot facility on 25 acres of land leased from the University of Nevada, Reno (UNR), expanding its network by 1,600 to 1,755 seats and extending into grades 9–12.

This application represents the largest charter expansion in Northern Nevada history. It is not a routine programmatic adjustment. Based on a rigorous review of Nevada Revised Statutes, administrative regulations, and recent findings by the Nevada Legislative Auditor, we urge the State Public Charter School Authority (SPCSA) to exercise its statutory duty to deny this application in its entirety. Approving this project under current conditions poses severe risks to taxpayer dollars, undermines demographic equity, and violates the statutory intent of Nevada's charter school framework.

The Proposed Expansion Violates Legislative Intent and Precedes Oversight Reforms

NRS 388A.150 authorizes the creation of high-quality charter schools specifically designed to expand educational opportunities, including for *at-risk pupils,* and meet identified, unmet community needs. The statute does not authorize growth for the sake of corporate expansion or the duplication of existing public infrastructure.

1. Premature Approval Ahead of Audit-Mandated Business Rules: This application comes directly on the heels of the August 2026 Legislative Audit of the SPCSA (Audit LA26-12) presented to the Legislative Commission's Audit Subcommittee.

The Legislative Auditor revealed widespread, systemic failures in your agency's oversight of EMO contracts and financial reporting. Specifically, auditors identified nearly $15.5 million in EMO management fee payments that were improperly reported or understated publicly, over $1.9 million in undisclosed payments to EMO-affiliated entities, state education funds deposited into out-of-state bank accounts, and severe deficiencies in contract enforcement.

Considering a $55 million expansion that will increase annual management fee payments to Academica from $493,614 to over $1.24 million per year—totaling more than $4.29 million in taxpayer funds flowing to a private Florida corporation over five years—*before* the SPCSA has established and implemented new, rigorous business rules to govern EMO contracting and fiscal transparency is neither defensible to the public nor to the Legislature.

2. Procedural Deficiencies: NAC 388A.400 requires a charter school to submit a formal Notice of Intent at least 45 days prior to filing a material amendment. The April 2026 document relied upon by the SPCSA as the "notice" failed to disclose a second K–12 campus, failed to disclose 1,700 new seats, failed to disclose a $55 million capital project, and failed to state an intent to amend the charter contract.

   In fact, when the Washoe County School District (WCSD) requested public records of any formal notices in June 2026, SPCSA staff stated that no such notice existed. Furthermore, DANN's application fails to satisfy mandatory multi-campus requirements under NAC 388A.400(9), including separate campus leadership, matriculation policies, and campus-specific lottery procedures. These mandatory statutory and regulatory prerequisites cannot be deferred, conditioned away, or cured after approval.

Failure to Serve Underserved Populations while Siphoning District Resources

DANN's application justifies its geographic placement by citing lower-performing 1- and 2-star schools in ZIP code 89502. However, the demographic realities of DANN's existing campus and its expansion projections prove that it has no intention of serving the vulnerable students residing in those neighborhoods:

- Demographic Disparity: WCSD currently serves 15.2% English Language Learners (ELL), 16.7% Students in Special Education programs (SPED), and a district average of 64% to 65% Free and Reduced Lunch (FRL) eligible pupils. DANN's existing campus enrolls just 1.2% ELL and 10.34% SPED pupils.

- Exclusionary Projections: In its multi-campus network application, DANN projects an enrollment profile of 0% At-Risk pupils, 0 unhoused or foster youth, and just 9% FRL eligibility. This is not serving an unmet need in the community; it is intentionally creating a separate-but-equal haven for families with the greatest access to resources.

Lack of Operational Infrastructure: Despite claiming it will serve underserved populations, DANN projects a staffing model for 1,570+ new students that includes only a single ELL Coordinator, offering no meaningful operational plan for bilingual services, newcomer supports, or intensive special education programming.

This cherry-picking of the least costly, highest-performing students is both unconscionable and illegal. Their 1,750-student expansion will siphon approximately $18 million annually in state Pupil-Centered Funding Plan revenues out of our already underfunded school system. Nevertheless, WCSD will be left to educate the vast majority of the region's high-needs, high-cost pupils with depleted operational funds.

Moreover, DANN's claim of "sustained unmet enrollment demand" is factually false. Washoe County is experiencing its fifth consecutive year of declining total enrollment and a decade-long decline in birth rates. WCSD already provides comprehensive AP, IB, STEM, CTE, School of Choice, and university partnership programs, including an existing UNR lab school partnership at the newly reconstructed Vaughn Middle School. Siphoning $18 million annually directly undercuts Washoe County taxpayers' $600 million WC-1 investment in rebuilding neighborhood schools, including the planned expansion of Wooster High School.

Circumvention of K-12 Capital Restrictions via the UNR Land Lease

The proposed financial and facility arrangement on 25 acres of UNR's Agricultural Experiment Station property represents an unprecedented, financially imprudent use of public education funds:

- Zero Public Capital Asset: DANN proposes to incur $50 million to $55 million in debt, with annual debt service obligations of approximately $3.8 million. However, because UNR is legally prohibited from selling state agricultural land, DANN is leasing the property. DANN will never own the land or the facility. At the conclusion of the 20-year lease (or upon default), the $55 million facility reverts entirely to UNR.

- Unlawful Higher Education Capital Diversion: Under the guise of a "laboratory school" model, this arrangement essentiallyuses K-12 Pupil-Centered Funding Plan dollars and K-12 public debt to construct higher education capital facilities for UNR. Nevada law does not permit K-12 operational and facility funds to be converted into permanent higher education real estate assets.

- Unvetted Financial and Environmental Risk: The site sits in an undeveloped agricultural area with acknowledged floodplain considerations, unresolved traffic and utility infrastructure needs, and an aggressive construction timeline. DANN's estimated construction cost of $500–$550 per square foot represents a 20% to 30% shortfall compared to actual Nevada public works costs ($650–$750/sq. ft.). If enrollment fails to materialize amidst declining regional birth rates, Nevada

taxpayers and students will bear the brunt of this $3.8 million annual debt burden.

Conclusion

Chapter 388A requires the SPCSA to evaluate whether a proposed charter expansion responds to a demonstrated, unmet educational need and serves the best interests of Nevada pupils. The record before you proves that this application fails every legal, financial, demographic, and operational standard required for approval. Against the backdrop of an already indefensible audit of your operations, we urge the SPCSA to deny DANN's Request for Amendment in its entirety.

Sincerely,

Senator Skip Daly
Senator Angie Taylor
Assemblymember Natha Anderson
Assemblymember Heather Goulding
Assemblymember Selena La Rue Hatch
Assemblymember Erica Roth

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[1]Academica Nevada's central headquarters are located in Miami, Florida as indicated on their website https://academicanv.org/