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To: Kurt Thigpen, Chair, SPCSA
Members of the SPCSA Board

From: Sarah Adler, as a private citizen

Re: Opposition to DANN Expansion Application

As Board members of the State Public Charter School Authority (SPCSA), it is your responsibility to interpret Nevada Revised Statutes, Chapter 388A, as it pertains to charter school applications. It is not your responsibility to “put more kids into 4 and 5 star seats”. Although increasing high quality “seats” is a worthy objective, an aspect of quality is creating school environments where diverse learners (At-Risk, Free and Reduced Lunch, English Learners, and Special Education students) feel at home. Replicating the suburban model of Doral should not take precedence over the intent and specifics of statute, nor should it result in harm to schools that are meeting the intent of the law, which is to provide quality school choice to diverse learners.

To move the bottom line to the top: I urge SPCSA Board members to reject the DANN expansion application. It is not only premature, it is also not the school model designed to serve the students most in need of an improved education environment and there is no reliable evidence that indicates the proposed school will meet that essential criteria.

Other participants in this discussion will raise important concerns such as location in a flood plain, traffic, and student safety. I will narrow my input to my experience with Nevada charter school law since its inception in 1997, followed by being the lead charter lobbyist in the 2019 session where the current [NRS 388A.220](#) was established through AB426, to my recent experience representing Washoe County School District (WCSD) sponsored charter schools in the 2023 and 2025 sessions. I am currently not on contract with any charter schools, nor do I anticipate returning to that role.

Key Statutory References:

[NRS 388A.220](#), subsection 8. *On or before January 31 of each year, the State Public Charter School Authority shall prepare, in collaboration with the Department and, to the extent practicable, the board of trustees of each school district in this State and any other sponsor of a charter school in this State, an evaluation of the demographic information of pupils, the academic needs of pupils and the needs of any pupils who are at risk of dropping out of school in this State.*

[NRS388A.246](#), Subsection 10. *Responsibility of applicant to show: The manner in which the charter school plans to identify and serve the needs of pupils with disabilities, pupils who are English learners, pupils who are academically behind their peers and gifted pupils.*

AB426 of the 2019 session initiated these diverse learner requirements. Sec 6.3 of AB426 states: *Before approving an application to form a charter school, section 6.3 of this bill requires the proposed sponsor of the charter school to determine that the proposed charter school will address one or more needs identified in the applicable geographic evaluation and that it has received sufficient public input.*

Salient Points:

1. The intent of NRS 388A is that the SPCSA will determine the needs of diverse students (EL, low income, Special Ed, those at risk of dropping out) AND that proposed sponsors show they can reliably be counted on to enroll and meet the needs of those students.

The SPCSA should make an informed judgement about whether the proposed school is showing the capacity and intent to meet the law. Recognizing that it has no power to close the school if it does not meet these requirements, the SPCSA should be deeply analytical and extremely cautious before it approves any application.

Doral does not have a history of serving diverse learners in the same proportion in which they exist in Washoe County and surrounding counties. The application only weakly claims that diverse learners will be served, it does not support that claim with details associated with staffing, curriculum, and language access. The application says English Learner and Special Education enrollment will increase, but that is due to increased school size, not on a percentage basis. Nor does Doral purport to be the Academica model created to serve diverse learners – that is the Mater model of Academica schools. Academica also has Pinecrest and Somerset models of schools.

WCSD's own district sponsored charter schools demonstrate meeting the intent of the law, and at the same time, as a consequence of serving these populations, have lower star ratings:

- Bailey Charter Elementary School: At Risk 26%, Special Ed 10%, English Learner 47%, FRL 100%.
- High Desert Montessori: At Risk 11.6%, Special Ed 62%, English Learner 6%, FRL 26%
- Sierra Nevada Academy Charter School: At Risk 97%, Special Ed 16%, English Learner 11%, FRL 100%
- Mariposa Academy: Special Ed 13%, Hispanic 90%, English Learner 50%, FRL 100%
- Honors Academy of Literature: At Risk 6%, Special Ed 30%, English Learner 3%, FRL 21%

It is agreed that Doral is a successful 5 star school, but also must be acknowledged that it is located in an affluent area and has enrolled a less diverse demographic than the 1, 2, and 3 star schools in the district – it is easier to be 4 and 5 star in those conditions. Doral says it has a waiting list, these nondiverse learners will be the first to seek seats in an expanded Doral.

None of the Academica model schools are truly locally generated, unique academic approach schools as are District Sponsored charters such as High Desert Montessori, Sierra NV Academy Charter School, Bailey Elementary, Coral Academy, Mariposa Academy, Honors Academy of Literature, Carson Montessori – these are the original intent of the NV Charter School Law. Although DANN Principal Angela Orr is a passionate educator, Academica, the financial backer of DANN, primarily responds to market opportunity by creating schools via recruitment and formation of boards and creation of applications.

2. It is inappropriate for another large charter to be created at the same time as statewide school choice is just being implemented. WCSD recently published notices and instructions on how to seek to enroll in its specialty schools. The existence of school choice within traditional district schools as well as within

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existing charter schools negates the claim of DANN that there is unmet need. It is further negated by a multi-year trend of declining public school enrollment throughout Washoe County.

3. It is irresponsible for the SPCSA to approve an application for a school to build a \$55million, 1,500 student campus on land it does not own and therefore control in perpetuity. The ground here is a long-term lease from UNR with only a 20-year term and three 10-year renewals. Academica will recoup its investment through payment of a lease with taxpayer dollars.
4. Public charter schools are required by law to pay prevailing wage for construction projects, thereby creating a robust local economy. Academica schools avoid paying prevailing wage by leasing buildings from Academica. In doing so, Academica-backed schools are among the few who have the financial resources to assemble and SPCSA application; Academica subverts the intent of the law and uses it to its advantage against the opportunity of truly locally driven charter school formation. It has been reported that the principal, Angela Orr, said they will pay prevailing wage – how will that be documented and required?
5. The application contends it will create a lab school for teacher training in partnership with UNR. This will be a disservice to all the other schools in Washoe county who provide UNR students practicums and thereby have a chance to expose themselves to the students as future employers. Also, within Doral UNR students will not get exposure to the diverse learners they really need to gain experience with in order to successfully teach them when they enter other public investments in public schools.
6. The citizens of Washoe County have just invested ten years of sales tax into WC-1 to improve and enrich the offerings of district schools. For SPCSA to authorize another large public charter school, backed by an even larger development company, is to make it more difficult for the other schools in the district, district schools and district-sponsored charters, to fund their budgets.
7. It is not responsible to approve an application while another Academica school, the proposed Mater school in North Valleys, is in litigation. What will the financial impact of that be on Academica and how will those costs be sought to be distributed to Academica's client schools?

As a life-long public education advocate, a former teacher, a former school administrator, and a parent and grandparent, I greatly appreciate your service to public education by serving on the SPCSA Board, and I greatly appreciate your attention to this document and the issues it raises.