



Nevada State Public Charter School Authority

The Delta Academy

Site Evaluation and Risk Based Monitoring

Report: September 23, 2025

State Public Charter School Authority

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Links to Resources:

- [Nevada School Performance Framework \(NSPF\)](#)
- [SPCSA Academic Performance Framework Results](#)
- [SPCSA Organizational Performance Framework Results](#)
- [SPCSA Financial Performance Framework Results](#)
- [Best Practices](#)

Links to Risk Based Monitoring Resources:

- [Risk Based Monitoring Canvas](#)
- [Resource- Updated Policy Checklist: FY2025-2026 Policy and Procedure Checklist Fillable](#)
- [Grants Administration Canvas](#)
- [SPCSA Risk Based Monitoring Training Modules](#)

Part 1

The Delta Academy

Site Evaluation Report

Executive Summary

This Site Evaluation Report offers an analysis of evidence collected during the school evaluation. Pursuant to [NRS 388A.223](#), the State Public Charter School Authority (SPCSA) conducts a comprehensive review of evidence related to all charters within the portfolio during the first, third, and fifth years of operation. This comprehensive analysis addresses the school's academic and organizational effectiveness.

An analysis of the school's academic and operational success is undertaken by reviewing the most current versions of the Nevada State Performance Framework (NSPF), the SPCSA Academic Performance Framework, and the SPCSA Organizational Performance Framework.

In addition, the Site Evaluation Team conducts classroom observations to assess both the classroom environment and the instructional techniques on the day of the evaluation. The purpose of these observations is to collect evidence using a rubric based on the [Charlotte Danielson Framework for Teaching](#). All classroom rating outcomes are displayed within this report. The overall numbers provide information about the general nature of instruction at a given school during the day of the site evaluation.

SPCSA staff conduct focus group interviews by speaking with school leaders, governing board members, family members, those employed as staff, and most importantly, students enrolled at the school. The information gained during these focus groups is summarized and included in this report.

The site evaluation is designed to focus on teaching and learning (e.g. curriculum, instruction, assessment, and services for at-risk students) as well as leadership, organizational capacity, and board oversight. The SPCSA uses the established criteria to provide schools with a consistent set of expectations during each year of their charter. Final Site Evaluation Reports are published to the SPCSA website and used in conjunction with other performance information to determine renewal decisions.

Site Evaluation Findings: Strengths

A summary of strengths as observed through academic achievement indicators, classroom observations, focus group feedback, and portions of the Organizational Performance Framework.

Small class sizes

The Delta Academy takes pride in maintaining small class sizes for in-person instruction. This approach appears to foster stronger relationships between teachers and students, enabling more personalized instruction, especially for EL¹ students, allowing for a deeper exploration of topics compared to larger class settings.

Low staff turnover rate

The Delta Academy has maintained a very low turnover rate over the past three years, as noted by the school leaders during their presentation in the leadership focus group. During the staff focus group, team members consistently expressed that they feel genuinely appreciated and valued by the school's administration. In addition, staff attributed their long-term commitment to the school's small class sizes, which allow for more personalized instruction and contribute to their own sense of efficacy and professional fulfillment.

Positive teacher-student relationships

During the site visit at The Delta Academy, evaluators observed a calm and structured learning environment with minimal evidence of student disciplinary issues. Classrooms were effectively managed, transitions occurred smoothly, and students appeared engaged and respectful. One notable factor contributing to this favorable climate was the strong teacher-student relationships observed throughout the visit. Students shared multiple examples of a positive school culture and supportive interactions with staff, which are further detailed in the student focus group summary of this report.

Highly engaging lessons

Another notable strength of The Delta Academy was the high level of student engagement observed during face-to-face instruction, which can be attributed in part to the school's investment in professional development aligned with the Quality Teaching for English Learners² (QTEL) framework. Consistent with QTEL principles, many lessons demonstrated a clear emphasis on academic language development, intentional scaffolding, high cognitive demand, and meaningful student discourse.

Recent building purchase and land donation

A key strength of The Delta Academy is its recent purchase of a permanent building, along with the donation of additional land. The secured facilities and donated land position the school for future growth, expanded programming, and an enhanced learning environment for students.

¹ English language learners

² Quality Teaching for English Learners (QTEL) is a research-based professional development framework. The QTEL approach is designed to improve the quality of teaching and learning for English learners (ELs) by promoting deep, rigorous instruction that supports both academic content mastery and language development.

Site Evaluation Findings: Challenges

A summary of challenges as observed through academic achievement indicators, classroom observations, focus group feedback, and portions of the Organizational Performance Framework.

Limited after-school activities

One challenge noted for The Delta Academy is the limited number of after-school activities offered by the school. Feedback from multiple students and parents indicated a desire for a broader range of extracurricular opportunities. Suggestions included the addition of a Reserve Officer Training Corps³(ROTC) program, organized sports teams, and clubs or activities focused on science, technology, engineering, and math (STEM).

Communication challenges with students and parents in the online model

A noted challenge for The Delta Academy is the timely and consistent monitoring of the online program to ensure it is implemented with fidelity and effectively meets students' academic needs. It was reported by leaders that in some cases, a breakdown in communication occurs between students and instructors regarding expectations, progress, and available support within the online platform, which can hinder student engagement and success. In response to the challenge, The Delta Academy has hired six Student Success Advocates who work to ensure all online students are completing necessary work and keeping up with course pacing.

Transition from Clark County School District to SPCSA⁴

The Delta Academy has faced challenges during its transition from the Clark County School District to the SPCSA as its authorizer. These include the unavailability of student data in Infinite Campus⁵, as well as the need to revise or develop new policies and procedures to align with SPCSA requirements before presenting them to the board for approval.

Instances of student enrollment in the online program as a last educational resort

According to school leaders and staff, a recurring challenge within the online school is that many students enroll as a last resort, often after struggling in other educational settings. This pattern has contributed to higher rates of academic failure among these students, presenting ongoing challenges in supporting their engagement, motivation, and success.

³ The Reserve Officers' Training Corps is a group of college- and university-based officer-training programs for training commissioned officers of the United States Armed Forces.

⁴ State Public Charter School Authority

⁵ Infinite Campus is a web-based program providing families the ability to view academic information for their children.

Site Evaluation Findings: Recommendations

Recommended items are provided so charter schools may increase their school-wide performance and overall success. The Site Evaluation Team will follow up on these recommendations in preparation for the subsequent site evaluation.

Improve the middle school index score and star rating

Although The Delta Academy increased its Nevada School Performance Framework (NSPF) rating from one star to two stars between the 2023–24 and 2024–25 school years, continued improvement is necessary to further elevate academic achievement. SPCSA staff recommend that the school prioritize efforts to strengthen academic outcomes to progress beyond the current two-star status at the middle school level. Specifically, attention should remain on improving proficiency in math and science, where pooled averages are currently 14.4% and 14.6%, respectively, significantly below the SPCSA state averages of 43.6% in math and 50.8% in science.

Strengthen understanding of the Nevada State Public Charter School Authority expectations

The transition from Clark County School District to sponsorship by the Nevada State Public Charter School Authority (SPCSA) presents The Delta Academy with a valuable opportunity to align more closely with statewide charter school expectations. It is recommended that the school's board and leadership team deepen their understanding of the SPCSA's Governance Standards, as well as the Academic, Financial, and Organizational Performance Frameworks. The [Governance Standards](#), developed in accordance with Section 3 of Assembly Bill 419 from the 81st Session of the Nevada Legislature, outline the characteristics of strong charter school governance. Additional information, including the full [Performance Frameworks](#), can be accessed on the SPCSA website. Referencing these frameworks can help ensure high compliance with required Epicenter tasks and policies.

Participation in SPCSA trainings

It is recommended that leadership at The Delta Academy actively participate in monthly professional development sessions, including those focused on Canvas, technology tools, and other instructional supports. Staff should regularly view [asynchronous training modules](#) available on Canvas⁶ to reinforce learning and stay updated on key systems and practices.

SPCSA board training

It is recommended that all board members at The Delta Academy complete all required training from the SPCSA, including any specialized training related to governance, academic oversight, and financial accountability.

Consider refining the systems of monitoring in the online program

The Delta Academy may want to consider refining its system for monitoring the implementation and effectiveness of its online program. Effective oversight of student success in online learning requires a multi-faceted approach, including tracking course completion rates, analyzing assignment and assessment scores, conducting scenario-based learning exercises, and regularly monitoring individual

⁶ Canvas is a cloud-based Learning Management System (LMS) used by K–12 schools, colleges, and universities to manage and deliver educational content online.

student progress. Strengthening these systems can help ensure the online program is implemented with fidelity, meets student needs, and aligns with the school's academic expectations.

Consider adding more after-school programs

Through data collected from student and parent focus groups, Delta Academy should consider adding more after-school programs. Suggested additions include sports teams, ROTC, woodworking, and STEM-based activities. After-school programs are significant at the middle and high school levels, as they not only support student interests and talents but also can foster a sense of belonging, promote positive peer relationships, motivate positive academic performance, and keep students engaged in structured environments during critical after-school hours.

Site Evaluation Findings: Strong Recommendations

Strong recommendations identified during this site evaluation are listed here, if applicable.

Improve index score in high school

It is strongly recommended that The Delta Academy prioritize efforts to raise both the index score and star rating at the high school level, as current levels of student learning and academic achievement remain below expectations. Over the past three school years, the school has maintained a one-star rating on the Nevada School Performance Framework (NSPF), with an index score of 19 in 2022–23 and 24.5 in both the 2023–24 and 2024–25 school years. Notably, in 2023–24, the high school earned zero out of 25 possible points on the Academic Achievement Indicator, in part due to the participation penalty with math proficiency below 5% and English Language Arts (ELA) proficiency at 21.3%. However, the ELA proficiency improved in the 2024-25 school year to 33.8%, a 59% increase, indicating a positive upward trend.

Site Evaluation Findings: Deficiencies

Deficiencies identified during this site evaluation are listed here, if applicable.

There were no deficiencies for The Delta Academy during this site visit.

Focus Group Participation Data

Focus groups are conducted on the day of the site evaluation and last for 45 minutes. During an abbreviated site evaluation, focus groups are not conducted.

Name of Focus Group	Number of Participants
Governing Board ⁷	2
Family Members, Parents, and Guardians	7
Faculty and Staff	10
School Leadership	4
Students	12

⁷ Quorum was not met, and Open Meeting Law was not violated.

Focus Group Summary: Governing Board

Two Delta Academy Board members met virtually on the site evaluation day. Board members described their oversight role as ensuring reports were monitored monthly and working with school leadership on the star rating, as well as alignment with the school's common goals, policies, and procedures. The board is composed of members who have a background in executive leadership, legal, finance, and education, as well as a parent representative. The board did not currently have any open seats. Board members reported meeting at least six times per year and having a finance subcommittee.

Over the next one to two years, the Delta Academy board has identified several short-term goals and initiatives, including expanding campus facilities, improving star ratings, managing a smooth transition from the Clark County School District to the SPCSA, and implementing programs aimed at boosting academic performance. At the same time, the board acknowledged ongoing challenges, such as ensuring the recently purchased property aligned with budget priorities, maintaining financial consistency, and allocating resources strategically to benefit students by increasing student engagement and participation.

One board member relayed, “Parent and student feedback has been gathered through surveys, and an informal evaluation process was conducted quarterly. During these evaluations, the collected data was reviewed and analyzed to identify trends and inform decision-making.”

The board described the school’s climate and culture as welcoming, collaborative, and positive. One board member stated, “Both teachers and administrators enjoy coming to work and value being part of a supportive, team-oriented environment.” The overall atmosphere was also described as mild-mannered and upbeat, with high staff morale, which was recently discussed during a board meeting.

Board members shared that The Delta Academy had recently experienced notable successes. One board member highlighted, “An article in the Las Vegas Review-Journal highlighted the school’s growth in enrollment, reflecting increased community interest and engagement.” They also noted that the school successfully purchased its building, with the surrounding land donated by a private individual, an indication of strong external support and confidence in the school’s mission. These accomplishments were credited to the school’s continued efforts to build a positive reputation and create a stable, welcoming environment for students and families.

Focus Group Summary: Family Members, Parents, and Guardians

During the focus group, seven family members reported that school communication at The Delta Academy was strong and responsive. One parent shared, “I appreciated that the administration often identified and addressed issues proactively, even before concerns were raised.” Families received regular updates through the school app, and both positive and negative behaviors were communicated promptly. Parents noted that they could easily schedule meetings with teachers or counselors when needed, and that staff were open to constructive feedback. Another parent specifically appreciated receiving a proactive phone call from a teacher about a situation involving their child, even though their child was not at fault, before the student had a chance to share what had happened. Parents said, “The Delta Academy calls parents for positive reasons, not just negative ones,” which they said was refreshing and appreciated.

When asked why they chose to enroll their children at The Delta Academy and continue their enrollment, parents cited several key reasons. One parent shared, “The convenience of having all four siblings, middle and high school students, on the same campus provides a sense of peace of mind and security, knowing they were all in one building.” Another parent, whose children are in ninth and eleventh grades, explained that their son had previously been enrolled in the nearby district, where he struggled academically and socially, experiencing poor grades, frequent fights, and bullying. After transferring to The Delta Academy, he became an A/B honor roll student and now has a much brighter outlook. She indicated he is supported by opportunities like the Jobs for Nevada’s Graduates⁸ (J4NG) program, which is designed to equip students with the skills necessary for future success. At The Delta Academy, a dedicated J4NG specialist supports students in developing career readiness skills and provides ongoing guidance after graduation, including assisting postgraduates with job interviews and career pathways in trades. The program plays a vital role in preparing students for success both during their time at Delta and well beyond graduation. Parents also praised the school’s small class sizes, parent workshops, before- and after-school tutoring, and the supportive leadership, specifically noting their appreciation for the principal. One parent communicated, “Even when in-person seats were full, my child began online before transitioning to in-person due to our family’s strong desire to be part of the school community.”

When asked for ideas to improve The Delta Academy, parents suggested expanding extracurricular and specialty program offerings to engage students better. Specific recommendations included adding sports teams, ROTC, woodworking, and STEM-focused activities. Some parents also expressed interest in adding seats to the Rock Academy of the Performing Arts, a performing arts program specializing in contemporary instrumental and vocal music performance, musical theater, and music industry technical trade, which is already offered on the campus, but with a limited number of seats available. Additionally,

⁸ J4NG is a non-profit organization that changes the lives of youth through education, providing young Nevadans to better career pathways.

there was a suggestion to consider separating middle school (grades six through eight) and high school (grades nine through 12) students to better support the developmental needs of each group.

Focus Group Summary: Faculty and Staff

Staff members at The Delta Academy shared several recent success stories, attributing them to the school's increased instructional focus and commitment to student growth and development. They highlighted the middle school's improvement from a one-star to a two-star rating as a reflection of the educators' dedication and consistent efforts to support students. "I have really noticed the transformation of students from sixth through tenth grade over the years, observing their significant academic and personal growth," one teacher relayed. This progress was attributed to a shift in instructional priorities, including professional development through WestEd⁹ training, which helped staff align more closely around academic achievement and clearly defined goals. Students have become more actively involved in setting and tracking their own goals, which contributes to both their academic and social-emotional development. Staff also emphasized the importance of strong student-teacher relationships and a united team of adults who genuinely believe in their students' potential, which has created a more supportive and structured learning environment.

Staff expressed a strong sense of satisfaction and commitment to teaching at The Delta Academy. Teachers highlighted the benefits of smaller class sizes with in-person classes, compared to larger districts, which allow them to focus on instruction rather than constant classroom management. Vertical alignment across grade levels and ongoing collaboration support a cohesive instructional approach. Staff also praised the administration for being accessible, responsive, and supportive. One staff member said, "Administration often shows appreciation through small, thoughtful gestures that contribute to a positive work environment."

Staff remarked that teacher voice plays a meaningful role in shaping schoolwide decisions at The Delta Academy. One teacher recalled that when she first joined, there were no high school materials available, and she was tasked with researching and recommending an English language arts (ELA) curriculum. As a result of her input, the school adopted a new curriculum for high school instruction. In another example, a math teacher stated, "I collaborate regularly with colleagues across grade levels to ensure aligned pacing and instruction." Teachers also noted that leadership actively listens during staff meetings and often implements changes based on teacher feedback, reinforcing a culture of shared decision-making and professional trust.

Staff described the school's climate and culture as calm, supportive, and mission driven. A staff member shared, "Each team member understands their role in contributing to the school's overall vision, and leadership fosters a sense of trust by empowering teachers to do their jobs effectively." Staff said high expectations, positivity, and empathy characterize the environment at The Delta Academy. Teachers noted a culture of care where positive student behavior and accomplishments are regularly discussed. With three social workers on campus, staff also feel supported in addressing student needs, as they can easily reach out to the social work team with concerns.

⁹ WestEd is an educational company that provides schools with custom professional development, research and evaluation, and technical assistance.

The staff at The Delta Academy offered several suggestions for improvement. They expressed a desire for improved health insurance options. They emphasized the importance of continuing to strengthen collaboration toward a shared schoolwide vision. While professional development was appreciated, teachers noted it can sometimes feel overwhelming and suggested focusing more on practical, ready-to-use strategies. Additionally, staff recommended increasing consistency across grade levels in areas such as note-taking and instructional routines to support alignment and continuity for students.

Focus Group Summary: School Leadership

Four school leaders at The Delta Academy provided an overview during the focus group of the various educational models offered within the school portfolio. Approximately 20 to 25% of students are enrolled in the traditional model, which meets in face-to-face instruction each day. The majority of students (75%) are in the online model. A small percentage of students opt for the hybrid model, which allows them to engage in academics online while participating in sports at their zoned schools. The Step-Up Program, a college readiness initiative, requires an application process and currently serves 32 students. The fourth model, Rock Academy of the Performing Arts, serves high school students in grades nine through 12 has 32 students in its specialized arts program.

School leaders shared that the online school employs licensed teachers to provide instructional support, but students work through a self-paced curriculum using Edgenuity¹⁰. They noted that a dedicated team of six Student Success Advocates take a proactive approach in supporting newly enrolled online students and their families, emphasizing the importance of planning ahead and staying self-motivated as well as monitoring attendance and progression through courses. Administrators also reported that they hold student-led conferences with families as needed when students fall behind in their Edgenuity coursework.

School leaders reported that differentiated instruction is in place for middle and high school students, but only for those enrolled in the traditional face-to-face model, which accounts for approximately 25% of the student population. One leader stated, “Each student maintains a data binder to track their own progress, and MAP¹¹ Growth assessments are administered in fall, winter, and spring to measure growth.” In middle school, the school leverages Moby Max¹² to address academic gaps. “Instruction is structured through rotations and stations based on this data, allowing for targeted support and extension,” one leader relayed. Leaders reported that a dedicated in-house data specialist assists with analyzing results to inform instructional decisions. Leaders also noted that tutoring is a mandatory class period during the school day, ensuring that all students in the traditional model receive structured academic support.

School leadership highlighted staff retention as a major strength, noting no teacher turnover over the past three years. Leaders credit this to a robust “grow-your-own” approach, which supports some staff from alternative licensure pathways through earning a master’s degree, fostering a culture of continuous growth and loyalty. The school also offers a higher pay scale compared to nearby districts. Additionally, leaders and staff reported that the school creates a positive and supportive work environment through meaningful perks such as daily lunches provided and on-site car detailing services, which boost staff morale and overall job satisfaction.

¹⁰ Edgenuity is an online, self-paced curriculum for grades three through twelve.

¹¹ Measures of Academic Progress (MAP) is a computer-adaptive assessment utilized to monitor student growth to inform and personalize instruction. MAP was officially adopted by the State Board of Education to assess Nevada students as a part of the Read by Grade Three (RBG3) program.

¹² Moby Max is an online learning platform that differentiates content based on students’ academic needs.

School leaders at The Delta Academy reported that student retention rates increased from 61% to 73% over the past school year. They acknowledged that one factor influencing retention is the absence of athletic programs, which often leads some students to transfer to traditional high schools in search of a more typical high school experience. However, leaders noted that many students return for their junior and senior years, drawn back by the school's supportive environment and academic focus. The school is exploring the possibility of adding sports programs in the coming years as a strategy to further improve retention and provide a more well-rounded high school experience.

As a new school within the SPCSA, leadership at The Delta Academy shared challenges they are currently navigating. One of the primary concerns involves access to student data, particularly in relation to the transition from Infinite Campus. Leaders expressed that it would be helpful to receive examples of items to be submitted to the SPCSA. They also noted difficulties accessing historical academic and behavioral records for students transferring from their previous school district, which can limit their ability to provide timely and targeted supports. Another challenge mentioned was a lack of physical space, which sometimes impacts the school's ability to expand programming and accommodate students effectively.

Focus Group Summary: Students

On the day of the site evaluation, 12 students expressed their thoughts and ideas about their experience at The Delta Academy during their face-to-face instruction. Students shared that one of their favorite aspects of attending Delta Academy is the close-knit, supportive environment where everyone knows each other. Several students noted that teachers not only care deeply about their academic success but also about their mental and emotional well-being. They appreciated the personalized approach to instruction, including how teachers explain concepts in ways that are easier to understand—such as using more accessible vocabulary in math. One student shared, “After I struggled at a previous school, The Delta Academy helped me feel stable and valued, making sure I stayed ahead rather than being overlooked.”

Students reported that they are most engaged in class when lessons are interactive and collaborative. They enjoy learning through visual instruction, hands-on projects, and partner or group work, which allows them to build connections with classmates and learn as a team. These are strategies that the teachers at The Delta Academy offer. One student mentioned, “We did a lesson where we built Hot Wheels ramps to explore speed and velocity.” Another said, “One time, we measured objects to apply math and science concepts in real life.” Students stated that they also appreciate when teachers offer guidance and support when they are unsure about how to use materials or complete tasks.

All of the students interviewed said they have at least one staff member whom they could go to, should a problem arise. They shared that teachers know them not just as students, but as individuals, and they feel genuinely cared for. Many have developed personal connections with teachers and noted that staff members, including the five school counselors, often share their own life experiences and maintain confidentiality. One student relayed, “I feel comfortable with my science teacher because she is nonjudgmental.” Another student who moved to The Delta Academy from outside the United States said, “The online teachers encouraged me to do things, and now I go to in-person school and my social life is better. The teachers really encouraged that.”

Students shared that one challenge to learning is classroom distractions, such as other students talking, which can be difficult to ignore at times. Some students noted that having ADHD¹³ can also impact focus, but they appreciate that teachers allow tools like fidget toys and beanbag chairs to help manage attention without judgment. In terms of academic goals, students reported meeting regularly with teachers to review weekly objectives, which are broken down into smaller, manageable steps that lead to larger goals. They also engage in weekly ACT¹⁴ practice tests as part of their academic tracking.

¹³ ADHD, or Attention-Deficit/Hyperactivity Disorder, is a neurodevelopmental disorder that affects attention, self-control, and the ability to sit still or follow directions. It often includes symptoms of inattention, hyperactivity, and impulsivity.

¹⁴ ACT is an abbreviation for American College Test and is comprised of four distinct tests in English, math, reading, and science. Many colleges and universities in the United States require this for-profit examination for college admissions.

Classroom Environment and Instruction

Observation Rubric

A total of 19 middle, and 13 high school classrooms were observed for approximately 15 minutes on the day of the site evaluation.

Classroom Environment

	Distinguished	Highly Proficient	Approaching Proficient	Unsatisfactory	Not Observed
Classroom Learning Environment is Conducive to Learning	The teacher demonstrates knowledge and caring about individual students' lives beyond the class and school.	Talk between the teacher and students and among students is uniformly respectful.	The quality of interactions between teachers and students, or among students, is uneven, with occasional disrespect or insensitivity.	The teacher is disrespectful toward or insensitive to students' ages, cultural backgrounds, and developmental levels.	This criterion was not observed or rated.
	When necessary, students respectfully correct one another.	The teacher successfully responds to disrespectful behavior among students.	The teacher attempts to respond to disrespectful behavior among students with uneven results.	Students' body language indicates feelings of hurt, discomfort, or insecurity.	
	Students participate without fear of put-downs or ridicule from either the teacher or other students.	Students participate willingly but may be somewhat hesitant to offer their ideas in front of classmates.	The teacher attempts to make connections with individual students, but student reactions indicate that these attempts are not entirely successful.	The teacher displays no familiarity with, or care about, individual students.	
	The teacher respects and encourages students' efforts.	The teacher makes general connections with individual students.			
	TOTAL: 5	TOTAL: 22	TOTAL: 2	TOTAL: 0	TOTAL: 3
Establishing a Culture for Learning	The teacher communicates passion for the subject.	The teacher communicates the importance of the content and the conviction that with hard work all students can master the material.	The teachers' energy for the work is neutral.	The teacher conveys that there is little or no purpose for the work, or that the reasons for doing it are due to external factors.	This criterion was not observed or rated.
	Students indicate through their questions and comments a desire to understand content.	The teacher conveys an expectation of high levels of student effort.	Students exhibit a limited commitment to completing the work on their own.	The teacher conveys to at least some students that the work is too challenging for them.	
	Students assist their classmates in understanding the content.	Students expend good effort to complete work of high quality.	The teacher's primary concern appears to be to complete the task at hand.	Students exhibit little or no pride in their work.	
	TOTAL: 3	TOTAL: 28	TOTAL: 1	TOTAL: 0	TOTAL: 0

Classroom Environment and Instruction

Observation Rubric

A total of 19 middle, and 13 high school classrooms were observed for approximately 15 minutes on the day of the site evaluation.

Classroom Instruction

	Distinguished	Highly Proficient	Approaching Proficient	Unsatisfactory	Not Observed
Communicating with Students	If asked, students can explain what they are learning and where it fits into the larger curriculum context.	The teacher states clearly, at some point during the lesson, what the students will be learning.	The teacher provides little elaboration or explanation about what students will be learning.	At no time during the lesson does the teacher convey to students what they will be learning.	This criterion was not observed or rated.
	The teacher explains content clearly and imaginatively.	The teacher's explanation of content is clear and invites student participation and thinking.	The teacher's explanation of the content consists of a monologue, with minimal participation or intellectual engagement by students.	Students indicate through body language or questions that they don't understand the content being presented.	
	The teacher invites students to explain the content to their classmates.	The teacher makes no content errors.			
	Students use academic language correctly.	Students engage in the learning task, indicating that they understand what they are to do.	The teacher may make minor content errors. The teacher must clarify the learning task.	Students indicate through their questions that they are confused about the learning task.	
	TOTAL: 1	TOTAL: 28	TOTAL: 2	TOTAL: 0	TOTAL: 1
Using Questioning and Discussion Strategies	Students initiate higher-order questions.	The teacher uses open-ended questions, inviting students to think and/or offer multiple possible answers.	The teacher frames some questions designed to promote student thinking, but many have a single correct answer.	Questions are rapid-fire and convergent with a single correct answer.	This criterion was not observed or rated.
	The teacher builds on and uses student responses to questions to deepen student understanding.	Discussions enable students to talk to one another without ongoing mediation by the teacher.	The teacher invites students to respond directly to one another's ideas, but few students respond.	The teacher does not ask students to explain their thinking.	
	Students extend the discussion, enriching it.	Many students actively engage in the discussion.	The teacher calls on many students, but only a small number participate.	Only a few students dominate the discussion.	
	Virtually all students are engaged.				
	TOTAL: 2	TOTAL: 17	TOTAL: 7	TOTAL: 0	TOTAL: 8

Classroom Environment and Instruction

Observation Rubric

A total of 19 middle, and 13 high school classrooms were observed for approximately 15 minutes on the day of the site evaluation.

Classroom Instruction

	Distinguished	Highly Proficient	Approaching Proficient	Unsatisfactory	Not Observed
Engaging Students in Learning	Virtually all students are engaged in the lesson.	Most students are intellectually engaged in the lesson.	Some students are intellectually engaged in the lesson.	Few students are intellectually engaged in the lesson.	This criterion was not observed or rated.
	Lesson activities require high-level student thinking and explanations of their thinking.	Most learning tasks have multiple correct responses or approaches and/or encourage higher-order thinking.	Learning tasks are a mix of those requiring thinking and those requiring recall.	Learning tasks, activities, and materials require only recall or have a single correct response.	
	Students have an opportunity for reflection and closure on the lesson to consolidate their understanding.	Students are invited to explain their thinking as part of completing tasks.	Student engagement with the content is largely passive.	The lesson drags on or is rushed.	
		The pacing of the lesson provides students with the time needed to be intellectually engaged.	The pacing of the lesson is uneven—suitable in parts but rushed or dragging in others.		
	TOTAL: 2	TOTAL: 22	TOTAL: 5	TOTAL: 0	TOTAL: 3
Using Assessment in Instruction	Students indicate they clearly understand the characteristics of high-quality work.	The teacher makes the standards of high-quality work clear to students.	There is little evidence that the students understand how the work is evaluated.	The teacher does not indicate what quality work looks like.	
	The teacher uses multiple strategies to monitor student understanding.	The teacher elicits evidence of student understanding.	The teacher monitors understanding through a single method, without eliciting evidence of understanding from students.	The teacher makes no effort to determine whether students understand the lesson.	
	Students monitor their own understanding.	Students are invited to assess their own work and make improvements.		Students receive no feedback, or feedback is global or directed to one student.	
	Feedback comes from many sources.	Feedback includes specific and timely guidance.	Feedback to students is vague.		
	TOTAL: 0	TOTAL: 25	TOTAL: 5	TOTAL: 0	TOTAL: 2

Classroom Observations and Additional Comments

Students participated in an interactive lesson on Warrior Women in Latin America, rotating through five stations set up around the classroom. At each station, they identified warrior characteristics and noted any surprising facts. Students were actively engaged by reading informational texts, recording insights on graphic organizers, and discussing their observations with peers and teachers. They organized and classified information to build understanding. Throughout the activity, teachers served as facilitators, while students took the lead in driving their own learning. The lesson lacked closure.

High school students were engaged in an English Language Arts lesson. There were ten students and two adults leading small-group instruction. The session focused on figurative language and a daily editing activity that involved transforming a compound sentence into simple sentences. The session concluded with a teacher-led activity, during which the teacher asked reflective questions about what students had learned during the session.

In a high school English Language Arts classroom, the teacher started the lesson by projecting the lesson's objective on the screen, which included a warm-up activity, an essay on vindication, a textbook definition match, and a writing paragraph on women's rights. The students actively engaged and demonstrated on-task skills as they independently followed along with their notebooks. The session transitioned to a short warm-up writing activity, which required students to write a simple compound sentence using a prompt presented on the screen by the teacher. During the observation, the teacher conveyed an expectation of high levels of student effort, and the students engaged with the learning task, indicating that they understood what they needed to do to complete it.

Students worked in pairs to answer the questions: "Why did the Pilgrims write the Mayflower Compact?" and "What problem do you think they were trying to solve?" They took turns reading the text independently and aloud to one another, searching for evidence to support their responses. The teacher circulated throughout the room, offering guidance and prompting students to discover the answers on their own. While some students were highly engaged in the task, others demonstrated more passive participation.

Fourteen high school students engaged in direct instruction learning algebra in a math class. There was one teacher providing direct instruction, while another staff member assisted the students. The teacher presented a math problem involving equations and inequalities on the screen, explaining the problem-solving step as the students followed along and took notes. Periodically, the teacher asked clarifying questions and emphasized the specific problem-solving strategy. Although the teacher asked clarifying questions, the students were not required to share their thought processes.

In a science class, students worked independently on a graphic organizer activity focused on natural resources, including where the resources are formed and how they are used, with examples such as groundwater and uranium. The two teachers in the room encouraged students to use information from a

previous presentation to support their work. Students remained engaged in the activity for approximately 15 minutes.

There were 13 middle school students and one teacher, conducting hands-on experiments in pairs. Students were highly engaged in the process and used several forms of academic language such as filter, living things, floating, and liquid. Students were happy, smiling, laughing, but also learning and engaged.

A rubric was provided for high school students as they worked independently on a social studies project involving the design of a park. The rubric included features such as inclusion, beauty and aesthetics, creative presentation, labels, and explanations. The teacher walked around the room, checking on students' progress as the students actively worked on their projects. There was a total of 17 students, and as they worked, they were able to share their thoughts with their classmates. The unit's focus was on urban planning and city design.

The teacher clearly communicated the learning objectives and revisited them with the class, prompting students to discuss the goals with a partner for four minutes. To motivate engagement, the teacher said, "I have an amazing treat for whoever can identify the V intercept." Meanwhile, another teacher circulated the room, reviewing student work and offering immediate feedback. While the lesson was well-designed and effectively delivered, about half or more of the students appeared off task and exhibited playful behavior.

After the teacher provided a few model examples, students independently practiced solving linear equations. They were encouraged to seek support from their peers as needed. To deepen their thinking, the teacher posed questions such as, "How do you know?" and continued circulating around the room, using additional questioning strategies, and offering individual praise. At the end of the activity, students came back together to share and discuss their work.

High school students worked on their devices and desktops in a computer science self-paced class. The common core standards that they focused on included knowledge constructor, innovative design, computational thinker, and creative communicator. The learning intentions included creating complex mathematical formulas, participating in online discussions, and using filter tools to analyze data, among other objectives. Fifteen students actively worked on their assignments while the teacher walked around the room monitoring each student's progress and provided assistance as needed.

There were ten students and one teacher in a high school classroom. The teacher read the text and asked questions of the students, discussing information and terms in the text. Then the teacher had a video to share with the students that expanded on the meaning in the text.

Measures of Progress from Previous Site Evaluation

The extent to which the school has been successful in maintaining areas of strength, removing challenges, and acting upon the recommended items made by the SPCSA Site Evaluation Team during the school's previous site evaluation.

The Delta Academy is new to the SPCSA portfolio as of the 2025-2026 school year. Therefore, the information below is not applicable

Prior Recommendation by Site Evaluation Team	School Assessment of Progress	SPCSA Staff Assessment of Progress
Not applicable	Not applicable	Not applicable

Operational Compliance Checks

Fire Extinguisher	☒ YES	☐ NO	
Nurse's Station	☒ YES	☐ NO	
Evacuation Plan in Classrooms	☒ YES	☐ NO	
Food Permit	☒ YES	☐ NO	☐ N/A
Elevator Permit	☒ YES	☐ NO	☐ N/A

Appendix A

The school may choose to submit a response to the SPCSA Site Evaluation Team's findings. This response will be included with the report in the public domain. The final report is submitted to the school's leadership and governing board, the SPCSA board, and into the public record via the SPCSA's website.

Part 2

The Delta Academy

Risk Based Monitoring Report

Executive Summary

Per NRS 388A.150, the SPCSA is responsible for providing oversight of the charter schools it sponsors. This includes conducting site evaluations during the first, third, and fifth years of the charter contract and, as needed, to follow up on strong recommendations or identified deficiencies. The SPCSA is committed to ensuring a smooth, meaningful, and timely process using a well-designed, intentional, research-based protocol.

Additionally, as a pass-through entity of federal funds, the SPCSA is required to conduct risk assessments of subrecipients in accordance with 2 C.F.R. §200.332(b). These assessments evaluate compliance with program and fiscal requirements but do not measure the quality or determine future eligibility.

Risk Based Monitoring: (1) Visit Details

Location	The Delta Academy 818 West Brooks Avenue, North Las Vegas, NV 89030
Financial Period or Fiscal Years/ School Years Covered	07/01/2024 – 06/30/2025
Date(s) and time(s) of Monitoring	Tuesday, September 23, 2025 12:00PM – 4:00 PM
Objectives	• Review the capacity, performance, and compliance of a subrecipient charter school • Address high-risk and specific issues that need immediate attention • Determine fidelity of program delivery • Ensure that any subaward of federal funds is used for authorized purposes; in compliance with federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved
Date of Report	October 8, 2025

Risk Based Monitoring: (2) School Overview

- Total Number of Students: 1490
- Grade Levels: 6 - 12
- Grants with Active Subawards:
 - FY26 Special Education (IDEA, Part B)
 - FY26 Title I, Part A
- Grants with Allocations (subaward pending):
 - FY26 Title II, Part A
 - FY26 Title II, Part A, Off Set - State
- Total Federal Funds Expended in Previous FY (FY25): Not applicable – not a part of the SPCSA portfolio
- Single Audit Required: N/A
- Current Risk Level: High
- Prior Risk Level: Not applicable – not a part of the SPCSA portfolio

Risk Based Monitoring: (3) Scope of Review/Methodology

The following activities were completed during this monitoring visit:

- **Scope of fiscal review:**
 - Fiscal Administrative requirements, including:
 - Compliant system of internal controls
 - Compliant system to determine allowability of costs
 - Compliant financial management and accounting system
 - Compliant procurement system
 - Compliant plan for audit resolution
 - Compliant system for inventory management
 - Compliant system for records retention
 - Appropriate use of funds (Monitored in conjunction with review of program implementation)
- **Scope of program review:**
 - Special Education
 - IEP development, meeting and record maintenance process aligned to federal and state requirements
 - IEP(s) are fully implemented
 - Progress monitoring is regularly conducted in accordance with IEP, federal/state requirements and best practices
 - Ongoing parent communication, participation, and engagement
 - Special Education IEP/file review
 - Title IA
 - Program development included needs assessment, community outreach (parents, teachers, school staff, students) and alignment to School Performance Plan: Road Map to Success (“SPP”)
 - Program implementation aligns to federal requirements and program plan
 - School has worked to ensure effective involvement of parents and the community to improve student academic achievement
 - School regularly collects data and monitors progress towards goals and intended outcomes
 - For CSI, TSI, TSI/ATSI schools, evidence that the school is making progress towards exiting the designation
 - Additional Areas
 - McKinney-Vento
 - Foster Care

Risk Based Monitoring: (4) Summary of Visit

The following tables identify areas of strength, recommendations, and issues identified during this monitoring visit. Issues identified are based on the school's preparation of supporting documentation and presentation of information. These findings are not exhaustive, and additional concerns may exist that were not observed during the review. It is the responsibility of the school to engage in ongoing internal oversight of grants and grant management processes to ensure compliance with all federal and local statutes, regulations, and policy requirements.

- Areas for improvement have been identified. A School Support Plan is required.

Risk Based Monitoring: (4.1) Area of Strength

Monitoring Area: Fiscal

- The leadership and fiscal team at The Delta Academy demonstrated a warm and professional demeanor, fostering a welcoming and transparent atmosphere during interactions with SPCSA staff. They responded to inquiries in a timely and informative manner.
- The Delta Academy is actively building a collaborative team dedicated to the responsible oversight and management of grant funding. Efforts are underway to clearly define the roles and responsibilities of school personnel and board members. As requested, the school provided SPCSA staff with its current Accounting Policies and Procedures Manual. Work is ongoing to establish and refine business processes at both the school and charter levels to ensure compliance and effectiveness in grant administration.
- Staff at The Delta Academy expressed a strong willingness to revise policies, procedures, and operational practices identified by the SPCSA fiscal team during our onsite visit to align with federal requirements and support sustainable grant management.
- The Delta Academy's vendor scoring rubric and criteria checklist were noted by fiscal staff as an exemplar.
- The school's leadership and finance team has emphasized their commitment to leveraging funds in ways that directly support and enhance student achievement. They aim to maximize the impact of grant resources to benefit student learning outcomes.

Monitoring Area: Special Education- Program

- The Delta Academy was highly accommodating and provided valuable information about the school's history and its non-traditional program designed to support student learning. During the school walkthrough, the administrator showcased the various systems of support in place for both in-person students and those attending virtually. The Delta Academy has several staff members who have been with the school for over ten years. This demonstrates a level of staff retention that is notable within the charter sector, where turnover is often higher. Such longevity may contribute to continuity of practice, institutional knowledge, and stronger relationships with students and families. Additionally, the administrator highlighted instructional practices tailored to diverse learner needs, as well as the integration of technology to support virtual learners. These systems reflect efforts to align the school's instructional model with the needs of its student population.
- During the special education monitoring block, the required documents for review were easily accessible, and the special education instructional facilitator (SEIF) was prepared to provide additional information regarding the school's program implementation. A randomly selected student file was reviewed, and the folder presented was organized and generally compliant. The SEIF was attentive and receptive to feedback during the debrief. She demonstrated a commitment to improving the school's special education program by asking follow-up questions and seeking clarification.

Monitoring Area: Title IA - Program

- The school consistently provides updates to teachers, staff, and parents on its performance through MAP testing results, SBAC, WIDA, Summit K-12, Moby Max, and attendance data.

Delta Academy hosts two family engagement events each year, which teachers are also required to attend. In addition, the school offers monthly parent events and workshops.

- To further support families, the school has added a Student Success Advocates team to improve communication with online families.

Monitoring Area: Title II – Program

- Title II funds are effectively utilized for teacher and staff training, which is critical to enhancing instructional quality. The allocation demonstrates a clear commitment to building educator capacity.
- Delta is providing professional development by training teachers in QTEL strategies, which promote increased student discourse across all subjects and classrooms. These strategies benefit all students, not just English Learners, as they enhance communication and engagement in learning.

Monitoring Area: Title III – Program

- Delta Academy does not receive Title III funding; therefore, it is not applicable. However, it is noted that the school supports English Learners by training teachers in QTEL strategies, which help increase student discourse across all subjects and classrooms. EL students receive additional support through pull-out services and small group instruction. The program utilized is Summit K-12, which targets all four domains of the WIDA assessment.

Monitoring Area: Title IV – Program

- Delta Academy does not receive Title IV funding; therefore, it is not applicable.

Monitoring Area: Additional Areas: McKinney Vento and Foster Care

- With McKinney-Vento and Foster Care, bus passes are provided to ensure that transportation is never a barrier for students. Delta also offers referrals to community providers, advocates, social-emotional support, food bags, school supplies, and other essential resources. In addition, the team reviews key student data monthly, including attendance, to ensure students stay on track and receive timely support when needed.

Risk Based Monitoring: (4.2) Area of Improvements/Recommendations

Monitoring Area: Fiscal

1. The SPCSA recommends strengthening the following areas in the school's written policies and procedures:
 - The SPCSA highly recommends that the school include both a table of contents (TOC) and page numbers in The Delta Academy's revised Accounting Procedures Manual when submitting the school's written fiscal policies and procedures to the SPCSA for additional review. Providing a table of contents and page numbers allows school staff or relevant stakeholders to quickly locate specific sections or chapters, making the document easier to navigate, helping to identify potential omissions or errors, and offering a clear overview of the document's organization and logical flow.
 - The Delta Academy did not complete the required 2025 Fiscal Policy and Procedure Self-Evaluation Checklist, which was attached to the Pre-Opening Fiscal Policies and Procedures Epicenter Task when the school submitted its written policies and procedures February 11, 2025. This appears to have been an accidental oversight. The SPCSA encourages staff responsible for fulfilling Epicenter submissions to carefully review submission directions prior to uploading. Please complete the Self-Assessment Checklist using the updated FY26 checklist when submitting the revised policy as part of the School Support Plan. A link is provided in the Resources column below.
 - Continue to strengthen specifics on applicable personnel and administration roles and responsibilities related to grant-related fiscal administration. Ensure that documentation is clear and consistent across the organization to avoid confusion and misinterpretation.
 - Include further detail in with written policies and procedures to ensure the *how*, *who*, and *when* are thoroughly documented. Procedures should be clearly tied to policies. Making this relationship explicit and explaining how each procedure supports the school's goals and strategic plans helps ensure both understanding and compliance. The SPCSA has sample fiscal "Policy and Procedures" templates available on the Risk Based Monitoring Canvas portal that may assist: <https:spcsa.instructure.com/courses/75>.
 - Detailed step-by-step procedures should be written so that tasks can be easily followed by all users, including both tenured and new school personnel, as well as contracted staff hired. This helps protect business processes and maintain internal controls in the event of staff turnover or expansion of grant programs. Additionally, detailed processes and procedures can be used to develop internal training documentation and should be evaluated annually by fiscal staff to identify and refine process gaps to help improve efficiency and effectiveness metrics.
2. Regularly monitor Federal and State grant subaward spend down in the SPCSA's Grants Management System (GMS) to ensure that grant funds are used as intended and in accordance with the approved grant subaward. Grant spend-down tracking supports accurate financial reporting and planning and helps prevent the return of unused funds at the end of the period of performance.
3. Regularly monitor and submit all required federal and state grant-related compliance reports in Epicenter by the assigned deadlines. Once grant funds are awarded, recipients are required to

report information to federal and/or State agencies on the use of the federal grant funds. Financial and programmatic reporting provides key information about the overall financial status and program performance of the grant. These reporting requirements are outlined in the authorizing statutes and regulations for each grant program accepted by the charter school upon execution of the grant award. A list of known federal and state fiscal Epicenter reporting requirements is available in the SPCSA's Grants Administration Repository, along with the anticipated due dates: [Fiscal Epicenter Reporting Requirements](#).

4. The SPCSA recommends that the charter school begin reviewing and developing two new fiscal criteria that will be required in the school's written policies and procedures beginning in FY27 (2026-2027 school year). Both criteria will be included under fiscal topic F2: "Allowability of Costs." Sample policies and procedure guides are available in the SPCSA's Risk Based Monitoring Canvas repository and are provided in the links below.
 - A. Health and Welfare: [FINAL SPCSA PP Health and Welfare .pdf: 2022_10_18 REPOSITORY Risk Based Monitoring](#)
 - B. Fringe Benefits: [FINAL SPCSA PP Fringe Benefits.pdf: 2022_10_18 REPOSITORY Risk Based Monitoring](#)
5. It is recommended that school and contracted staff responsible for grant management continue annual professional learning on Uniform Guidance topics, based on industry best practices and federal regulations to strengthen subaward performance and compliance with federal regulations. Recommended organizations include:
 - Brustein and Manasevit,
 - National Association of Federal Education Program Administrators (NAFEPA)
 - National Grants Management Association (NGMA).

Monitoring Area: Special Education- Program

The SPCSA outlines the following requirements and best practices for strengthening the school's written policies, procedures, and program implementation:

- Ensure that the Records Access List is displayed and posted near the area where confidential special education folders are kept, and that it is up to date with the names of appropriate staff authorized to access the files.
- Ensure that all confidential file folders contain a file access log.
- Refrain from using "No effect statement needed" or any of its variations in the third column of the PLAAFPs. Always provide a statement demonstrating whether the student does or does not need any support and/or services in a particular area to show progress.
- The SPCSA recommends consistent practice in discussing with parents or guardians whether an interpreter is needed for special education meetings when their child is identified as LEP, even if English is listed as the student's primary language. Indicate whether the parent accepted or declined the interpreter by logging the information in the student's confidential folder status log.
- For EL students who are receiving special education services, ensure that information on the most recent WIDA ACCESS or screener scores is provided in the PLAAFPs. Additionally, Special Factors #3 must be marked as "Yes." Supplementary Aids and Services must contain accommodations/supports addressing the student's language development needs based on the most recent EL assessment scores.
- Include information on the areas in which the student will receive SDI and/or Related Services in the Intent to Implement form.
- Provide the first PWN to the parent within a reasonable time (ten days) prior to the meeting.

- Develop IEP goals that contain both a rate/level of proficiency/mastery and a frequency of level of attainment to ensure more measurable achievement/progress toward goals and to allow for replication of the proficiency/mastery. Example: *80% accuracy in 4/5 trials*.
- Review the SPCSA Memo from September 9, 2024, regarding compliant service logs, and ensure that the school uses service logs that contain all the required areas for documentation. Staff must regularly complete service logs and place copies in the student's confidential folder or upload them to Infinite Campus.
- Discuss appropriate transition services at the next annual IEP review for students aged 14 years and older. Review required information for PWN, PLAAFP, and the transition area of the student's IEP.
- Strengthen staff capacity through ongoing training and oversight on special education policies, procedures, and practices, while ensuring participation in SPCSA training opportunities.
- Ensure all staff have ready access to the school's Special Education Policies and Procedures Manual to reference IDEA/IEP requirements and maintain compliance.
- Regularly monitor and track due dates for evaluations, IEP meetings, and required special education reports to ensure all timelines are met in accordance with IDEA, NAC, and SPCSA requirements.
- A list of additional resources/links is provided in a separate document as a special education resource for the charter school.

Monitoring Area: Title IA

- Delta Academy does not have the NDE Desktop Monitoring: Title I School-Parent-Family Compact (Accord) posted on their website, but it is due on October 24, 2025 in Epicenter. Ensure all required documents are completed as indicated.
- It is recommended that the school continue to submit the School Improvement Plan (SIP) in the Plan4Learning app in conjunction with the grant application process in the spring.
- It is recommended that the school continue to complete the SIP Status Checks by the due date specified in Epicenter, using the Plan4Learning application.

Monitoring Area: Title II – Program

- There are no areas of improvement or recommendations at this time.

Monitoring Area: Title III – Program

- Delta Academy does not receive Title III funds at this time. Please ensure that all required tasks are completed in Epicenter and that documents are posted on the school's website. Ensure that the documents are well-organized and easy to access. Per NDE guidance, all documents should be accessible within two (2) clicks.

Monitoring Area: Title IV – Program

- Delta Academy does not receive Title IV funds at this time.

Monitoring Area: Additional Areas: McKinney Vento and Foster Care

- To ensure continued compliance with the McKinney-Vento Homeless Assistance Act, the SPCSA recommends that Delta Academy continue to use the [McKinney-Vento Non-Regulatory Guidance](#) as a key resource. This guidance offers clear, actionable strategies for

supporting students experiencing homelessness, aligning with federal requirements while addressing the unique needs of this vulnerable population.

Risk Based Monitoring: (4.3) New School Support Plan

Any issues identified below require an improvement plan. The information below describes the conditions found during this monitoring visit.

Monitoring Area: Fiscal Internal Controls

- **Issues Identified:**

- **Conditions Found Not in Compliance:**

The following required written policies and procedures are not fully compliant with the Uniform Guidance and indicate deficiencies in internal controls:

1. Allowability of Costs
2. Accounting & Financial Management Systems
3. Audit Resolution
4. Inventory and Equipment Management
5. Records Retention

- **Cause of Deficiency:**

The segregation of duties among responsible parties for the management of grant funds is not consistently documented across all core fiscal processes in the school's written policies and procedures. This results in noncompliance with the Uniform Guidance (e.g., overlapping roles identified responsible for completing the same task in different sections of the document and/or outdated title names for several responsible roles).

- **Effect of Deficiency:**

Grant-related processes conducted without proper segregation of duties may result in misuse, waste, fraud, or abuse of federal funds, thereby undermining the integrity of the school's operations.

- **Criteria Used**

- 2 CFR § 200.303

- **Improvement Plan:**

Develop appropriate written policies and procedures, document business processes for grants, and ensure all required internal controls are present within each policy. Complete and submit the following to the SPCSA:

- *Criteria Reference: Internal Controls School Self Evaluation Form item #3*
 - Overall comment: Please remove outdated references to the Clark County School District (CCSD) and/or other outdated information, such as ESSER/COVID-19 awarded grants.
 - Include a section and additional detail on how the charter school monitors the effectiveness of fiscal performance. For example, this could be demonstrated through regular summative board presentations, staff performance evaluations, or alignment with School Improvement Plan (SIP) goals or other performance measures.
 - *Criteria Reference: Internal Controls School Self Evaluation Form item #4*
 - This criterion requires specifying staff roles and duties to demonstrate segregation of duties. The SPCSA observed overlapping of responsibilities and outdated role titles. For

- example, there is a Controller role that is not identified in the current policy. Other roles are documented (e.g., Bookkeeper 1, Bookkeeper 2, Grant Manager, Business Manager, Superintendent, Principal, etc.) that may have new titles or refer to staff responsible for key fiscal processes (e.g., “Accounting Staff”) that should be clarified further to ensure separation of duties. The SPCSA suggests creating a staff appendix or revising the existing policy and procedure to ensure compliance responsibilities are clearly assigned to specific positions and are not in conflict.
- *Criteria Reference: Internal Controls School Self Evaluation Form item #7*
 - Please include in your written policies and procedures to ensure there are reasonable cybersecurity and other internal control safeguards in place to adequately protect grant assets and personally identifiable information (PII) deemed sensitive, in accordance with applicable Federal, State, local and tribal laws.

When responding to the School Support Plan (SSP):

- Specify the page numbers AND paragraph(s) where the revisions can be found.
- Highlight the updates in the revised policy to help streamline the SPCSA review process.
- Complete the updated FY2025-2026 Policy and Procedure Checklist (a template is available under the “SPCSA Support and Resources” column).
- Ensure that the referenced pages/paragraphs identified in the checklist align with the school’s revised policy prior to submitting the SSP.

Monitoring Area: Allowability of Costs

- **Issues Identified:**
 - **Conditions Found Not in Compliance:**
The written allowability policies and procedures are not fully compliant with the Uniform Guidance.
 - **Cause of Deficiency:**
The charter school's written policies and procedures are either absent or do not sufficiently address how allowability is determined throughout the grant management process.
 - **Effect of Deficiency:**
A lack of, or insufficient internal controls within the school's written policies and procedures for determining allowability may lead to misuse of funds. Obligated costs and expenditures may not be reasonable, necessary, or allocable to federal awards and may be deemed unallowable. As a result, funds may need to be repaid to the federal government, which could lead to financial strain
- **Criteria Used**
 - 2 CFR §200.402(b)(7);
§200.403;
§200.405;
§200.303;
 - 2 CFR §200.430(a);
 - 2 CFR 200.430(g).
 - U.S. Dept. of Ed Cost Allocation Guide (pg. 33-34)

- **Improvement Plan:**

Develop compliant written policies and procedures. Relevant staff should become familiar with the documented processes. The policies and procedures should address all required Uniform Guidance requirements. They should also explain how and when allowability will be determined throughout the grant management process, who determines allowability and approves or authorizes costs, and what records will be retained to demonstrate that allowability determinations were made for all award-funded costs. The procedures should be detailed enough to serve as standard operating procedures for internal staff training. While the Uniform Guidance cannot address every potential cost, it establishes a series of general and selected items of cost for recipients to consider and comply with when spending federal funds.

- *Criteria Reference: Allowability of Costs School Self Evaluation Form item #3*
 - Strengthen procedures for how a given cost will be evaluated (including staff responsible) to determine whether the requested cost is reasonable, necessary, and allocable to the federal grant, as required by the Uniform Guidance Federal Cost Principles and the subaward.
- *Criteria Reference: Allowability of Costs School Self Evaluation Form item #4*
 - Strengthen required authorization and/or approval procedures that ensure that costs were approved prior to procurement or contracts awarded , and that approvals were sufficiently documented by all relevant staff responsible.
Example noted: Page 3 – vendor quotes and what is required for support documentation prior to reimbursement.
- A sample QuickGuide is available in the Resources section for further guidance. Detailed procedures should specify the roles of school staff, back-end provider fiscal staff, and applicable board members.
- *Criteria Reference: Allowability of Costs School Self Evaluation Form item #5*
 - Include a policy and procedure identifying the staff responsible for collecting required time and effort documentation for personnel funded with federal and, if applicable, state funding. A Canvas resource has been provided to help the school understand the types of reporting and requirements.

Monitoring Area: Program: Fiscal: Accounting and Financial Management

- **Issues Identified:**

- **Conditions Found Not in Compliance:**

The written financial management and accounting systems policies and procedures are not fully compliant with the Uniform Guidance.

- **Cause of Deficiency:**

The school's standardized fiscal management policies and procedures for conducting and supporting key fiscal management processes and accounting activities are not sufficiently documented to fully meet compliance with the Uniform Guidance.

- **Effect of Deficiency:**

Current business processes may not fully comply with the Uniform Guidance. This could lead to inadequate internal controls over fiscal management and accounting processes, such as grant tracking and management, grant reconciliations, procurement, reimbursement requests, and/or cash management procedures.

- **Criteria Used**

- 2 CFR §200.302;
- 200.302(b);
- 2 CFR 200.303

- **Improvement Plan:**

Develop compliant written policies and procedures. Relevant staff should become familiar with documented processes. The policies and procedures should address all required Uniform Guidance requirements for fiscal management and accounting, and include key processes and procedures related to grant tracking, fiscal and accounting management, grant reconciliations, procurement, reimbursement requests, and cash management.

- *Criteria Reference: Accounting and Financial Management System School Self Evaluation Form item #3*

- Required components for separate identification and tracking of all federal funds must be documented and included in the accounting system. Required identification components include:
 - Assisted Listing Number (ALN) title and number
 - Federal Award Identification Number (FAIN)
 - The year the Federal award was issued
 - The name of the Federal agency or pass-through entity
 - Expenses recorded must be aligned with the correct Nevada State Chart of Accounts (COA).

Not all required standards were identified in the school's written policy, and these standards should also be reflected in the school's grant tracker. The ALN and FAIN numbers can be found on the executed grant award signed by the school (a copy of the executed subaward is uploaded in the GMS). Please ensure that all seven (7) standards are included in the school's updated policies and procedures and in the school's accounting management system. The school noted that its current accounting system is QuickBooks, but they are in the process of migrating to NetSuite which should be complete around January 2026. A sample grant tracker has been provided in the Resources column for reference.

- *Criteria Reference: Accounting and Financial Management System School Self Evaluation Form item #6 & #7*

- As previously discussed under internal controls criteria #4, ensure that when the school resubmits its updated segregation of duties policies and procedures, the staff identified as responsible for performing reconciliations are separate from authorizing, initiating, and finalizing transactions. Clear roles should also be assigned for related processes, such as ensuring disbursement made by checks meet signature requirements.

When responding to the School Support Plan (SSP):

- Specify the page numbers AND paragraph(s) where the revisions can be found.
- Highlight the updates in the revised policy to help streamline the SPCSA review process.

- Complete the updated FY2025-2026 Policy and Procedure Checklist (a template is available under the “SPCSA Support and Resources” column).
- Ensure that the referenced pages/paragraphs identified in the checklist align with the school’s revised policy prior to submitting the SSP.

Monitoring Area: Program: Fiscal: Inventory Management

- **Issues Identified:**

- **Conditions Found Not in Compliance:**

The written inventory management policies and procedures are not fully compliant with the Uniform Guidance.

- **Cause of Deficiency:**

The charter school's inventory management policies and procedures do not sufficiently address the required inventory management processes, including provisions for purchasing equipment, properly labeling equipment, tracking equipment in the school's inventory, and adequately safeguarding equipment from loss, damage, or theft.

- **Effect of Deficiency:**

There is a potential for fraud, waste, or abuse of federal funds. Inadequate inventory management and controls could result in loss or theft. Additionally, costs due to surplus or deficit may need to be covered by grant budgets as a result of insufficient inventory management

- **Criteria Used**

- 2 CFR §200.313 (d)(1);
 - 2 CFR §200.332;
 - §200.313 (d)(3);

- **Improvement Plan:**

Develop compliant written policies and procedures outlining how the school will control inventory to ensure safeguards are in place to prevent property loss, damage, or theft. Any loss, damage, or theft of equipment must be investigated. The procedures should be detailed enough to serve as standard operating procedures for internal staff training.

- **Complete and submit to the SPCSA:**

- *Criteria Reference: Inventory Management School Self Evaluation Form item #4*
 - Several required federal perpetual inventory report requirements are missing from the school's current policy (e.g., ALN, FAIN, Unit Cost, Title holder, Percentage of Federal Participation, Use/Condition, Disposition). Please update the school's policy to ensure that written procedures for properly labeling and recording items in the school's inventory tracker include the following requirements:
 1. Description of inventory
 2. Serial number
 3. Acquisition date of purchase
 4. Federal funding source
 5. Assisted Listing Number (ALN)

6. Federal Award Identification Number (FAIN)
7. Unit cost
8. Who holds Title
9. Percent of federal participation
10. Location/room number
11. Use and condition
12. Disposition information for lost/stolen equipment)

If the school would like to see an example report, please refer to the sample "Federal Perpetual Inventory Template" attached to the assigned Epicenter task due April 28, 2026.

- *Criteria Reference: Inventory Management School Self Evaluation Form item #5*
 - During the monitoring visit, safeguards were discussed as being in place but were not documented. Please update the school's written policies and procedures to include the safeguards pertaining to loss, theft and damage that were shared. At a minimum, a physical inventory must be conducted every two (2) years; however, the SPCSA recommends that a physical inventory be conducted annually. Additionally, the SPCSA highly recommends that the school create a form to document investigative processes, especially for instances of theft or other equipment loss.

When responding to the School Support Plan (SSP):

- Specify the page numbers AND paragraph(s) where the revisions can be found.
- Highlight the updates in the revised policy to help streamline the SPCSA review process.
- Complete the updated FY2025-2026 Policy and Procedure Checklist (a template is available under the "SPCSA Support and Resources" column).
- Ensure that the referenced pages/paragraphs identified in the checklist align with the school's revised policy prior to submitting the SSP

Monitoring Area: Program: Fiscal: Record Retention

- **Issues Identified:**
 - **Conditions Found Not in Compliance:**
The written record retention policies and procedures are not fully compliant with the Uniform Guidance.
 - **Cause of Deficiency:**
The charter school's written policies and procedures are either absent or do not sufficiently address record retention processes required for federal grant awards.
 - **Effect of Deficiency:**
Current business practices conflict with requirements under the Uniform Guidance. As a result, the school may be required to repay funds if records are unavailable
- **Criteria Used**
 - 2 CFR §200.334-§200.338;
 - 34 CFR 76.730-731

- 2 CFR §200.303(e)
- **Improvement Plan:**
The school's written Records Retention policy and procedures must include the required internal controls to demonstrate that reasonable measures are in place to provide the necessary protections and safeguards mandated by federal regulations and privacy laws.
- **Complete and submit to the SPCSA:**
 - *Reference: Internal Controls School Self Evaluation Form item #6*
 - Provide further detail on the procedures for how assets purchased with grant funds sensitive information associated with the performance of grant awards will be secured and protected. Include who is responsible and how often the procedures are performed in the revised policy.

When responding to the School Support Plan (SSP):

- Specify the page numbers AND paragraph(s) where the revisions can be found.
- Highlight the updates in the revised policy to help streamline the SPCSA review process.
- Complete the updated FY2025-2026 Policy and Procedure Checklist (a template is available under the "SPCSA Support and Resources" column).
- Ensure that the referenced pages/paragraphs identified in the checklist align with the school's revised policy prior to submitting the SSP.

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Monitoring Area: Program: Special Education

- **Issues Identified:**
 - **Conditions Found Not in Compliance:**
No clear Effects statements (third column of PLAAFPs) were provided for areas the were not identified as deficient. Instead of documenting how or if the disability affects involvement and progress, staff defaulted to a blank phrase ("No effect statement required").
 - **Cause of Deficiency:**
The cause of the deficiency may be due to expectations or practices established by the school's former district.
 - **Effect of Deficiency:**
Including a clear Effects Statement in the PLAADP is important because federal requirements specify that it must describe how the child's disability impacts their involvement and progress in the general education curriculum. A well-written Effects Statement also provides the foundation for identifying the most appropriate goals, supports, accommodations, and specialized instruction.
- **Criteria Used**
 - [NAC 388.284](#)
 - [34 CFR 300.320](#)
- **Improvement Plan:**

To strengthen the quality and compliance of IEP development, schools should ensure that all PLAAFP sections include individualized Effects/Impact statements that describe how the student's disability does or does not affect access to, progress in, and involvement with the general education curriculum and setting. Please avoid the use of generic phrases such as "No effects needed", "x," "none needed," "see above," or "see previous IEP".

If the identified area is not impacted, a clear statement should be provided indicating that the student is able to access general education setting without supplemental services or supports.

The school should submit evidence of correction to the SPCSA:

1. Specific to this File: The school should submit evidence of correction to the SPCSA by providing the student's next IEP, which must include corrected PLAAFP Effects statements. The IEP must include the appropriate signatures of IEP meeting participants to demonstrate that the meeting has been held.
2. Submit an acknowledgement form, signed by all applicable staff (including contracted service providers, if applicable), confirming that they have received and reviewed training on this requirement.

Monitoring Area: Program: Special Education

- **Issues Identified:**

- **Conditions Found Not in Compliance:**

The IEP transition section did not include a statement of the student's course of study, as required. Instead of describing the focus of coursework (e.g., general studies, vocational program, advanced placement, or curriculum leading to a standard diploma), the IEP included a statement about future employment ("[Student] will be gainfully employed at the job of his choosing"). This response reflects a postsecondary employment goal rather than a statement of the student's course of study.

- **Cause of Deficiency:**

The cause of the deficiency is unknown.

- **Effect of Deficiency:**

When the IEP does not specify the student's course of study, staff, parents, and the student lack clear guidance on the educational pathway the student will follow to prepare for postsecondary goals. This can result in coursework that is misaligned with the student's interests, strengths, and diploma track, reducing opportunities to access advanced placement, vocational programs, or other appropriate courses of study.

- **Criteria Used**

- [NAC 388.284](#)
 - [34 CFR 300.320\(b\)\(2\)](#)

- **Improvement Plan:**

Including a clear Statement of Transition Services: Course of Study in the IEP is essential to ensure that students are on an educational pathway aligned with their future vision, interests, and postsecondary goals. This requirement, which begins no later than age 14, helps guide the

selection of appropriate coursework—such as general studies, advanced placement, or vocational programs—that prepares the student for life after high school. When this statement is missing or replaced with postsecondary goals alone, the IEP does not provide adequate direction for course planning, which can limit opportunities and hinder readiness for postsecondary education, training, or employment. Strengthening this practice ensures compliance with IDEA and NAC requirements while supporting meaningful, student-centered transition planning.

The school should submit evidence of correction to the SPCSA:

1. **Specific to this File:** The school should submit evidence of correction to the SPCSA by providing the student's next IEP, which must include Statement of Transition Services: Course of Study that is appropriate based on the student's vision for the future, preferences/interests, and postsecondary goals. The IEP must include the appropriate signatures of IEP meeting participants to demonstrate that the meeting has been held.
2. Submit an acknowledgement form, signed by all applicable staff (including contracted service providers, if applicable), confirming that they have received and reviewed training on this requirement.