



APPROVED

SACRAMENTO CITY UNIFIED SCHOOL DISTRICT BOARD OF EDUCATION

Agenda Item# 10.2

Meeting Date: September 19, 2024

Subject: Determination Hearing for Charter Renewal for Sacramento Charter High School

- ☐ Information Item Only
- ☐ Approval on Consent Agenda
- ☐ Conference (for discussion only)
- ☐ Conference/First Reading (Action Anticipated: _____)
- ☐ Conference/Action
- ☒ Action
- ☒ Public Hearing

Division: Deputy Superintendent's Office

Recommendation: Based on Sacramento Charter High School's (SCHS) status in the California Department of Education's middle-performing renewal level, a comprehensive review of the charter renewal petition, an evaluation of its program over the most recent charter term, and response to the District's Notice of Alleged Fiscal and Governance Violations and Reasonable Opportunity to Cure (Notice to Cure) pursuant to E.C. section 47607(e), the District's review team has concluded that the renewal petition, coupled with the corrective action plan submitted in response to the Notice to Cure, **collectively meet the minimum legal standards under the Education Code to qualify for approval for the requested five-year term, beginning July 1, 2025, through June 30, 2030.**

If the District's Board takes action to approve the renewal petition, District staff will oversee SCHS's full satisfaction of the corrective actions described in the plan and any other conditions or oversight items that the Board may direct.

Background/Rationale: On June 28, 2024, SCHS submitted a petition to renew its charter. It is requesting to renew the term of its charter, which expires on June 30, 2025. On August 8, 2024, the District held an initial public hearing to consider the level of support for the petition from the district's teachers, other employees, and parents/guardians. The governing board of the school district shall either grant or deny the renewal of the charter within 90 days of receipt of the petition. At the hearing in which the governing board votes on the renewal of the charter, the charter petitioners

must be provided with equal time and procedures as district staff to address the board on the proposed recommendation and findings on the petition.

District staff, in collaboration with an external review team, reviewed the submitted petition, artifacts from the SCHS's most recent charter term, and publicly-available student outcome data. District staff also reviewed SCHS's corrective action plan submitted in response to the District's Notice to Cure. Findings from that process were compiled into the Staff Renewal Report, which was posted on the district's website on September 4, 2024. The Staff Renewal Report (attached) also includes an overview of the legal guidance on the criteria for renewal.

Education Code sets out specific procedures that must be followed as part of the petition review process. One of these procedures is for District staff to propose written factual findings concerning the petition, which could support either a reauthorization or a denial of the charter. This were done in the form of the Staff Renewal Report. They are based on staff's evaluation, and the Board is not required to adopt the findings in that report in whole or in part. If there are specific findings of fact that the Board desires to make concerning the petition, which may include findings supporting a denial, that is its prerogative and such action is consistent with the statutory language of The Charter Schools Act.

Ultimately, the Board is the decisionmaker on whether to approve, conditionally approve, or deny the charter. The attached sample resolutions are designed to provide the Board with draft language around which to formalize that decision.

Financial Considerations: Review of the fiscal portions of the petition did not reveal any fiscal concerns that would likely result in a change of financial position for either the charter or the district.

LCAP Goal(s): Goal 2: Improving Academic Outcomes

Documents Attached:

1. Sample Resolution Language for Board Consideration
2. Exhibit A: Notice to Cure, dated July 26, 2024
3. Exhibit B: Response and Corrective Action Plan, dated August 26, 2024
4. Exhibit C: Staff Renewal Report, posted September 4, 2024

Estimated Time of Presentation: 15 minutes (Charter School must be allotted equal time to district staff)

Submitted by: Mary Hardin Young, Deputy Superintendent
Amanda Goldman, Director, Innovative Schools

Approved by: Lisa Allen, Superintendent



Sample Resolutions

Sacramento Charter High School

September 19, 2024

The following are sample resolutions that the board may use in their decision on the renewal of the charter. Where sections have been left blank, the board should include additional findings from the Staff Renewal Report to support the resolution.

They include:

1. An approval resolution, which references the charter school's agreement/affirmation to negotiate and enter into an MOU;
2. A conditional approval resolution, which requires the Board to articulate specific conditions that will need to be met by the charter school before it is effectively reauthorized; and
3. A denial resolution, which requires the Board to provide written factual findings supporting one or more legal grounds for denial, all of which are described in the resolution's recitals.

All three sample resolutions mention 3 attached exhibits. All of which follow at the end of this document.

- Exhibit A: Notice to Cure, dated July 26, 2024
- Exhibit B: Response and Corrective Action Plan, dated August 26, 2024
- Exhibit C: Staff Renewal Report, posted September 4, 2024

**RESOLUTION OF THE BOARD OF EDUCATION
OF THE SACRAMENTO CITY UNIFIED SCHOOL DISTRICT
Resolution No. 3440**

**Resolution to Approve the Renewal Petition for
Sacramento Charter High School**

WHEREAS, the approval of charter schools is governed by the Charter Schools Act of 1992, as subsequently amended, codified in Education Code section 47600 *et seq.*, and the implementing regulations of Title 5 of the California Code of Regulations (5 C.C.R. § 11960 *et seq.*);

WHEREAS, on June 28, 2024, the Sacramento City Unified School District (“District”) received the petition (“Renewal Petition”) for Sacramento Charter High School (“Charter School”).

WHEREAS, on July 26, 2024, the District issued a Notice of Alleged Fiscal and Governance Violations and Reasonable Opportunity to Cure (“Notice to Cure”) to St. Hope Public Schools (“SHPS”), as the operator of the Charter School, due to concerns regarding the Charter School’s fiscal and governance practices, which needed to be remedied, refuted, or include a corrective action plan on or before August 26, 2024, a copy of which is attached hereto as **Exhibit A** and incorporated herein by reference;

WHEREAS, a public hearing on the Renewal Petition was held on August 8, 2024, at which time the District’s Board of Education (“Board”) considered the level of support for the Renewal Petition by teachers employed by the District, other employees of the District, and parents/guardians;

WHEREAS, on August 26, 2024, SHPS, on behalf of the Charter School, submitted its written response to the Notice to Cure (“Response”), a copy of which (excluding exhibits due to size) is attached hereto as **Exhibit B** and incorporated herein by reference, which included a corrective action plan to address the fiscal and governance concerns addressed in the Notice to Cure;

WHEREAS, the Board published District’s *Staff Renewal Report* on September 4, 2024, which includes staff’s proposed findings of fact based on its evaluation of the Renewal Petition, information from the Charter School’s last charter term, available student outcome data, and SHPS’s Response and corrective action plan;

WHEREAS, the Board has convened on September 19, 2024, to consider whether to grant or deny the Renewal Petition;

WHEREAS, renewals of charters are governed by the standards and criteria set forth in Education Code sections 47605, 47607, and 47607.2;

WHEREAS, the consideration of a renewal petition requires the District to (1) determine whether the charter school meets applicable eligibility requirements using the new accountability criteria under the law and reflected in the California School Dashboard, and (2) evaluate whether the renewal petition meets the standards and criteria set forth in Education Code section 47605;

WHEREAS, Education Code section 47607 describes a three-tiered system that categorizes a charter school as a high-performing, middle-performing, or low-performing charter school. The designation of a charter school in a particular tier determines the level of review that the chartering authority must conduct to evaluate whether the charter school is eligible for renewal of its charter;

WHEREAS, for charter schools designated as middle-performing, the District must evaluate the following: (1) the charter school's performance on the state and local indicators on the California School Dashboard, both on a schoolwide basis and for all student subgroups served by the charter school, giving greater weight to the charter school's performance on measurements of academic performance, and (2) clear and convincing evidence, as demonstrated by verified data, which shows that the charter school has either (a) achieved measurable increases in student academic achievement, as defined by at least one year's progress for each year in school, or (b) strong post-secondary outcomes (e.g., college enrollment, persistence, and completion rates equal to similar peers). If a charter school satisfies such criteria, the Board may grant a renewal term of five years;

WHEREAS, the governing board of a school district shall not deny a petition unless it makes written factual findings specific to the particular petition, setting forth specific facts to support one or more of the following findings:

1. The charter school presents an unsound educational program for the students to be enrolled in the charter school.
2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
3. The petition does not contain the number of signatures required by subdivision (a) of Education Code section 47605. (*The signature requirement is not applicable to a renewal petition.*)
4. The petition does not contain an affirmation of each of the required conditions.
5. The petition does not contain reasonably comprehensive descriptions of all required elements.
6. The petition does not contain a declaration of whether or not the charter school shall be deemed the exclusive public school employer of the employees of the charter school for purposes of the Educational Employment Relations Act.

7. The charter school is demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate. *(This finding is not applicable to a renewal petition.)*
8. The school district is not positioned to absorb the fiscal impact of the proposed charter school. *(This finding is not applicable to a renewal petition.)*

WHEREAS, the governing board of a school district may deny renewal of a charter school in the middle-performing tier only upon making the following specific written findings:

1. The school has failed to make sufficient progress toward meeting standards that provide a benefit to the school's students; and
2. Closure of the school is in the students' best interests; and
3. The decision provided greater weight to performance on "measurements of academic performance"—the test-based indicators in English-Language Arts and mathematics, the English Learner Progress Indicator, and the Career and College Indicator.

WHEREAS, the Charter School is designated as a "middle-performing" charter school by the California Department of Education;

WHEREAS, the District has reviewed, evaluated, and considered the academic performance data provided by the Charter School as part of its Renewal Petition; and

WHEREAS, in considering the academic performance of the Charter School's students, the District has determined that the Charter School has met the applicable criteria to be eligible for renewal, a summary of which is included in the *Staff Renewal Report* published on September 4, 2024, which is attached hereto as **Exhibit C** and incorporated herein by reference.

NOW, THEREFORE BE IT RESOLVED, that the Board of Education of the Sacramento City Unified School District does resolve, determine, and order the following:

1. The foregoing recitals are hereby adopted as true and correct.
2. The Board has considered the Renewal Petition of the Charter School, including its academics, finances, operations, and other components, in addition to the criteria for renewal set out in the Education Code.
3. The Board has considered the Response to the Notice to Cure, including the proposed corrective action plan to address the identified fiscal and governance concerns.
4. The Board has considered, and approves of, the admissions preferences described in the Renewal Petition.

**RESOLUTION OF THE BOARD OF EDUCATION
OF THE SACRAMENTO CITY UNIFIED SCHOOL DISTRICT
Resolution No. 3440**

**Resolution to Approve with Condition the Renewal Petition for
Sacramento Charter High School**

WHEREAS, the approval of charter schools is governed by the Charter Schools Act of 1992, as subsequently amended, codified in Education Code section 47600 *et seq.*, and the implementing regulations of Title 5 of the California Code of Regulations (5 C.C.R. § 11960 *et seq.*);

WHEREAS, on June 28, 2024, the Sacramento City Unified School District (“District”) received the petition (“Renewal Petition”) for Sacramento Charter High School (“Charter School”).

WHEREAS, on July 26, 2024, the District issued a Notice of Alleged Fiscal and Governance Violations and Reasonable Opportunity to Cure (“Notice to Cure”) to St. Hope Public Schools (“SHPS”), as the operator of the Charter School, due to concerns regarding the Charter School’s fiscal and governance practices, which needed to be remedied, refuted, or include a corrective action plan on or before August 26, 2024, a copy of which is attached hereto as **Exhibit A** and incorporated herein by reference;

WHEREAS, a public hearing on the Renewal Petition was held on August 8, 2024, at which time the District’s Board of Education (“Board”) considered the level of support for the Renewal Petition by teachers employed by the District, other employees of the District, and parents/guardians;

WHEREAS, on August 26, 2024, SHPS, on behalf of the Charter School, submitted its written response to the Notice to Cure (“Response”), a copy of which (excluding exhibits due to size) is attached hereto as **Exhibit B** and incorporated herein by reference, which included a corrective action plan to address the fiscal and governance concerns addressed in the Notice to Cure;

WHEREAS, the Board published District’s *Staff Renewal Report* on September 4, 2024, which includes staff’s proposed findings of fact based on its evaluation of the Renewal Petition, information from the Charter School’s last charter term, available student outcome data, and SHPS’s Response and corrective action plan;

WHEREAS, the Board has convened on September 19, 2024, to consider whether to grant or deny the Renewal Petition;

WHEREAS, renewals of charters are governed by the standards and criteria set forth in Education Code sections 47605, 47607, and 47607.2;

WHEREAS, the consideration of a renewal petition requires the District to (1) determine whether the charter school meets applicable eligibility requirements using the new accountability criteria under the law and reflected in the California School Dashboard, and (2) evaluate whether the renewal petition meets the standards and criteria set forth in Education Code section 47605;

WHEREAS, Education Code section 47607 describes a three-tiered system that categorizes a charter school as a high-performing, middle-performing, or low-performing charter school. The designation of a charter school in a particular tier determines the level of review that the chartering authority must conduct to evaluate whether the charter school is eligible for renewal of its charter;

WHEREAS, for charter schools designated as middle-performing, the District must evaluate the following: (1) the charter school's performance on the state and local indicators on the California School Dashboard, both on a schoolwide basis and for all student subgroups served by the charter school, giving greater weight to the charter school's performance on measurements of academic performance, and (2) clear and convincing evidence, as demonstrated by verified data, which shows that the charter school has either (a) achieved measurable increases in student academic achievement, as defined by at least one year's progress for each year in school, or (b) strong post-secondary outcomes (e.g., college enrollment, persistence, and completion rates equal to similar peers). If a charter school satisfies such criteria, the Board may grant a renewal term of five years;

WHEREAS, the governing board of a school district shall not deny a petition unless it makes written factual findings specific to the particular petition, setting forth specific facts to support one or more of the following findings:

1. The charter school presents an unsound educational program for the students to be enrolled in the charter school.
2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
3. The petition does not contain the number of signatures required by subdivision (a) of Education Code section 47605. (*The signature requirement is not applicable to a renewal petition.*)
4. The petition does not contain an affirmation of each of the required conditions.
5. The petition does not contain reasonably comprehensive descriptions of all required elements.
6. The petition does not contain a declaration of whether or not the charter school shall be deemed the exclusive public school employer of the employees of the charter school for purposes of the Educational Employment Relations Act.

7. The charter school is demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate. *(This finding is not applicable to a renewal petition.)*
8. The school district is not positioned to absorb the fiscal impact of the proposed charter school. *(This finding is not applicable to a renewal petition.)*

WHEREAS, the governing board of a school district may deny renewal of a charter school in the middle-performing tier only upon making the following specific written findings:

1. The school has failed to make sufficient progress toward meeting standards that provide a benefit to the school's students; and
2. Closure of the school is in the students' best interests; and
3. The decision provided greater weight to performance on "measurements of academic performance"—the test-based indicators in English-Language Arts and mathematics, the English Learner Progress Indicator, and the Career and College Indicator.

WHEREAS, the Charter School is designated as a "middle-performing" charter school by the California Department of Education;

WHEREAS, the District has reviewed, evaluated, and considered the academic performance data provided by the Charter School as part of its Renewal Petition;

WHEREAS, in considering the academic performance of the Charter School's students, the District has determined that the Charter School has met the applicable criteria to be eligible for renewal, a summary of which is included in the *Staff Renewal Report* published on September 4, 2024, which is attached hereto as **Exhibit C** and incorporated herein by reference; and

WHEREAS, the District has also reviewed the Renewal Petition and, although the District had identified certain concerns and issues, which are noted in the *Staff Renewal Report*, the District believes that such matters can be effectively addressed as part of the charter oversight and monitoring process.

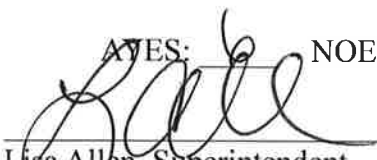
NOW, THEREFORE BE IT RESOLVED, that the Board of Education of the Sacramento City Unified School District does resolve, determine, and order the following:

1. The foregoing recitals are hereby adopted as true and correct.
2. The Board has considered the Renewal Petition of the Charter School, including its academics, finances, operations, and other components, in addition to the criteria for renewal set out in the Education Code.

3. The Board has considered the Response to the Notice to Cure, including the proposed corrective action plan to address the identified fiscal and governance concerns.
4. The Board has considered, and approves of, the admissions preferences described in the Renewal Petition.
5. The Board hereby approves the Renewal Petition for a five-year term, beginning on July 1, 2025, and ending on June 30, 2030, subject to the findings of fact set forth in the *Staff Renewal Report* published on September 4, 2024, and included in Exhibit C to this Resolution, and also subject to full satisfaction of the following condition which must be met by the Charter School no later than the corresponding deadline specified below.
 - a. District staff and the Charter School shall negotiate a memorandum of understanding addressing the respective rights and obligations of the parties consistent with the authorizer-charter relationship, which shall be approved by the respective governing boards of the parties prior to the commencement of the Charter School's renewal term on July 1, 2025.
6. The Superintendent or her designee shall have authority to determine whether the condition specified above has been effectively met by the Charter School.
7. The Superintendent or her designee is authorized and directed to take all other such actions as may be reasonably necessary to effectuate the purpose and intent of this Resolution.

PASSED AND ADOPTED by the Board of Education on September 19, 2024, at a duly noticed meeting by the following vote:

AYES: 6 NOES: 0 ABSENT: 1 ABSTAIN: 0

_____
Lisa Allen, Superintendent

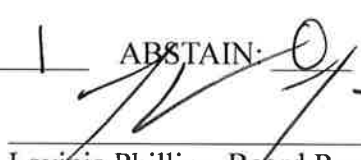
_____
Lavinia Phillips, Board President

EXHIBIT A

Notice to Cure, dated July 26, 2024

EXHIBIT B

Response and Corrective Action Plan, dated August 26, 2024

EXHIBIT C

Staff Renewal Report posted September 4, 2024



EXHIBIT A

OFFICE OF THE SUPERINTENDENT

5735 47th Avenue • Sacramento, CA 95824

Lisa Allen, Superintendent

BOARD OF EDUCATION

Lavinia Grace Phillips
President
Trustee Area 7

Jasjit Singh
Vice President
Trustee Area 2

Chinua Rhodes
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Christina Pritchett
Trustee Area 3

Jamee Villa
Trustee Area 4

Taylor Kayatta
Trustee Area 6

Justine Chueh-Griffith
Student Board Member

July 26, 2024

Via U.S. Mail and E-Mail:

Lisa Ruda, Superintendent
Members of the Board of Directors
St. Hope Public Schools
2315 34th Street
Sacramento, CA 95817

Re: Notice of Alleged Fiscal and Governance Violations and Reasonable Opportunity to Cure Pursuant to Education Code section 47607(e)

Dear Superintendent Ruda and Members of the Board of Directors:

This letter serves as the Sacramento City Unified School District's ("District") Notice of Alleged Fiscal and Governance Violations and Reasonable Opportunity to Cure ("Notice") to St. Hope Public Schools ("SHPS"), which operates St. Hope Public School 7 ("PS7") and Sacramento Charter High School ("SCHS"), pursuant to Education Code section 47607(e).

SHPS and the District have been partners in serving the students of Sacramento for over two decades. Though recently that partnership has become strained, it is the sincere hope of all parties involved in sending this Notice, that we can work together to craft a path forward. It is the shared interest of both the District and SHPS to ensure that students are provided opportunities to learn, grow and reach their greatness so that they may graduate with the greatest number of postsecondary choices from the widest array of options. The fiscal management and governance areas discussed in this Notice are both foundational and critical to this goal. Therefore, the District, as the authorizer responsible for the oversight of PS7 and SCHS, must be reasonably assured of the strength of those foundations.

On June 28, 2024, SHPS submitted a petition to renew the PS7 and SCHS charters for a term of five years ("Renewal Petitions"). Section 47607(e) provides that a chartering authority may deny the renewal of a charter school upon a finding that the school is demonstrably unlikely to successfully implement the program set forth in the petition due to substantial fiscal or governance factors after the chartering authority has provided at least 30 days' notice to the charter school of the alleged violation(s) and provided the charter school with a reasonable opportunity to cure the violation(s), including a corrective action plan proposed by the charter school. Given the intertwined nature of the shared operations, leadership and governance of PS7 and SCHS, we have provided this Notice, which is equally applicable to both charter schools, to SHPS.

Pursuant to Education Code section 47607(e), the District shall give SHPS a reasonable period of time to remedy or refute the fiscal and governance violations¹ described in this Notice. The District has determined that the violations identified below need to be remedied, refuted or meaningfully addressed in a plan of action on or before **Monday, August 26, 2024, at 5:00 p.m.**

I. CONTEXT OF NOTICE AND INVESTIGATION

In the spring of the 2023-24 school year, several concerns were raised about SHPS. Some of these concerns arose during the District's annual oversight process, others were shared with the District by California Teacher Association ("CTA") staff representing PS7 and SCHS educators, and others were brought by parents and teachers (former and current) of PS7 and SCHS. The District takes all concerns regarding the charter schools it authorizes seriously; however, at the same time, it recognizes that not all areas of a charter school's operations fall within its purview as an authorizer. As such, the District focused its investigation on the concerns falling within the scope of its oversight responsibilities, as well as those impacting the renewal of PS7's and SCHS's charters.

On May 10, 2024, the District notified SHPS of its intention to perform an investigation of these concerns. To ensure the investigation was implemented as objectively, independently and quickly as possible due to the anticipated submission of PS7's and SCHS's renewal petitions, the District contracted with Christy White Accountancy Corporation ("CW") to review items related to SHPS's governance and fiscal practices. The District's legal counsel, F3 Law, was also tasked to review the governance concerns, as well as other non-fiscal issues spanning the curriculum and instruction, special education, student discipline and chronic absenteeism, declining enrollment, employee complaints and other areas raised as concerns. A summary of the investigations is attached to this Notice.

It is important to note that this Notice pertains only to alleged fiscal and governance violations, including related staffing concerns. All other issues that were raised (and subsequently reviewed or investigated by F3 Law and District staff) shall be addressed, if substantiated, as part of the renewal process or pursuant to the District's oversight and monitoring of PS7 and SCHS during the remainder of their respective charter terms and any renewal terms.

On May 30, 2024, District staff requested a series of documents and other information from SHPS for purposes of the investigation. On June 20, 2024, SHPS provided an initial set of responsive records. SHPS provided additional records and clarification of those records in the subsequent weeks. CW and F3 Law completed their respective reviews on July 17, 2024.

There are two other entities described in this Notice: St. Hope Academy ("SHA") and St. Hope Development Center ("SHDC"). SHA was founded in July 1989 as an after-school program, but SHA now provides back-office services to SHPS. SHDC is described as a community and economic development organization under GuideStar and has the stated mission of fostering "the betterment of the community through real estate development and an increased quality of life through job training and employment opportunities." SHDC contracts with SHPS to provide property management and information technology services.

¹ The term "violation" in this Notice is used in alignment with the statutory language of Education Code section 47607(e).

II. ALLEGED FISCAL/GOVERNANCE VIOLATIONS

This section contains a description of the three areas identified by the District as alleged fiscal/governance violations. To add transparency and clarity, the District has summarized what it believes to be relevant law or charter provisions, the alleged violation with supporting detail, and encouraged corrective options. The District hopes that SHPS will consider this information supportive.

A. Non-GAAP Accounting Practices

Relevant Law/Charter Provisions

Charter schools – just like public school districts – are entrusted with the responsibility of managing public taxpayer funds in a fiscally-responsible and legally-compliant manner. Specifically, charter schools are required to meet generally accepted accounting principles (“GAAP”) and prudently oversee their finances. Failure to do so can result in the non-renewal or revocation of the charter school’s charter. (See Education Code sections 47605(c)(2) and 47607(f)(3).) The District, as the chartering authority, therefore, has an affirmative obligation to monitor the fiscal condition of the charter school to verify, at a minimum, that the charter school is meeting its financial reporting obligations under Education Code sections 47604.33 and 47605(m) and is engaging in GAAP-compliant practices.

Page 65 of PS7’s current charter states unequivocally that “the books and records of the Charter School will be kept in accordance with generally accepted accounting procedures, and as required by applicable law and the audit will employ generally accepted accounting procedures.” PS7 also affirms that it will resolve audit exceptions and deficiencies with its auditor, and “PS7, through SHPS Home Office Staff, will resolve any outstanding issues prior to the completion of the auditor’s final report. SHPS is confident this relationship with the district will be maintained and resolve any audit exceptions and deficiencies, if they so arise, to the satisfaction of the District.”

SCHS includes these same affirmations in its charter under Element I: Financial Audit. (See SCHS Charter, page 78.)

Alleged Violations

The District has significant concerns about SHPS keeping and providing adequate and accurate financial reports. SHPS contracts with SHA for its back-office services, which include budget preparation, fiscal and audit support. The most recent independent financial audits of SHPS reported a material weakness in its financial reporting internal controls for at least two years (i.e., the auditor’s 2021-22 and 2022-23 reported findings). According to the auditor, the books were not kept on a GAAP-compliant basis. The auditor made numerous adjustments, effectively closing the books that should have been closed by SHA. In addition, bank reconciliations were not being performed in a timely manner or properly reviewed, and SHA had difficulty locating records for the auditor, thus creating a need for an extension of the audit report due date. These concerns are reflected on page 12 in CW’s Agreed Upon Procedures Report (“CW Report”), which is enclosed with this Notice.

A material weakness is the most serious of internal control deficiencies. According to CW, it is defined as “a deficiency such that there is a reasonable possibility that a material misstatement of the School’s financial statements will not be prevented, or detected and corrected, on a timely basis.” GAAP accounting is expected of a back-office provider and is an integral part of any basic service.

It appears that SHA was keeping a basic checking account record, but not full financials. In addition, CW identified issues with the timely review of bank statements and locating accounting records. Given these deficiencies, CW concluded that the quality of the accounting and financial reporting services provided by SHA appears inferior to industry norms (See CW Report page 12).

Both the PS7 and SCHS charters affirmatively state that the organizational model of each charter school “represents fiscal conservatism and allocation of resources towards the Charter School’s mission.” (See PS7 Charter, page 46; SCHS Charter, page 59.) The CW Report, however, casts serious doubt on SHPS’s ability to prudently manage the public funds it has been entrusted for the operation of PS7 and SCHS based on its current structure and contract with SHA for back-office services. The failure to follow GAAP procedures, implementation of unsound fiscal practices, and lack of internal controls call into question whether PS7 and SCHS can meet their financial obligations in a sound and legally compliant manner, consistent with the law and their respective charters. The District further questions whether the charter schools’ use of SHA as a back-office service provider, including the employment of a CFO with a probationary status on his accountancy license, is a prudent choice given the deficiencies identified above and in the CW Report. The District expects SHPS to thoughtfully and carefully consider whether SHA possesses the requisite background, knowledge and expertise in education finance to carry out these critically important functions.

In light of these concerns, the District would hope to see PS7 and SCHS develop a corrective action plan that includes specific, measurable and focused actions to address the fiscal irregularities, lack of internal controls and lack of GAAP-compliant procedures based on the concerns articulated in this Notice and the enclosed CW Report. A plan of this nature would engender confidence in SHPS’s ability to successfully implement the charter school programs.

B. Employment of Qualified/Credentialed Educators

Relevant Law/Charter Provisions

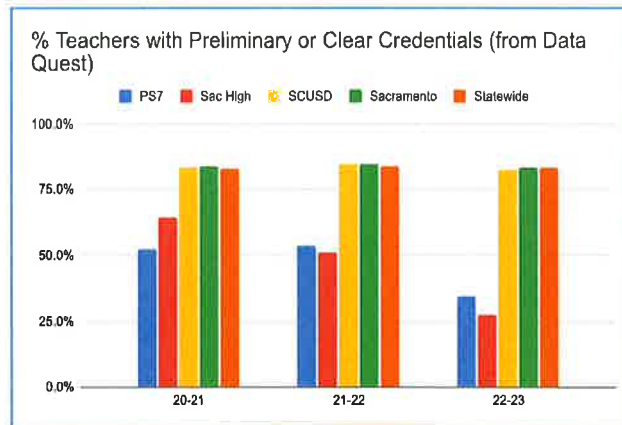
Education Code section 47605(l) provides that “teachers in charter schools shall hold the Commission on Teacher Credentialing certificate, permit, or other document required for the teacher’s certificated assignment” and such documents shall be maintained on file at the charter school. A charter school’s governing board may use local assignment options authorized in statute and regulations for the purpose of legally assigning certificated teachers in the same manner as a governing board of a school district. A charter school “shall have the authority to request an emergency permit or a waiver from the Commission on Teacher Credentialing for individuals in the same manner as a school district.” In addition, by July 1, 2020, all teachers in charter schools shall obtain a certificate of clearance and satisfy the requirements for professional fitness pursuant to Education Code sections 44339, 44340 and 44341.

PS7 makes assurances in its charter that it “shall meet all requirements for employment set forth in applicable provisions of law, including, but not limited to credentials, as necessary.” PS7 further promises to “ensure that teachers in the Charter School hold a Commission on Teacher Credentialing certificate, permit or other document equivalent to that which a teacher in other public schools are required to hold.” (See PS7 Charter, pages 6 and 50.) With respect to the provision of special education and related services, PS7 states that it will utilize experienced and certified special education staff to ensure it meets the unique needs and learning styles of its students, or it “may also provide related services by hiring credentialed or licensed providers through private agencies or independent contractors.” (See PS7 Charter, pages 22 and 37.)

These assurances are also included in SCHS’s charter. (See SCHS Charter, pages 5, 6, 37, 63.)

Alleged Violations

Both charters for PS7 and SCHS, as well as the submitted renewal petitions, include language that SHPS will verify teacher credentials as part of the hiring process, make efforts to minimize the use of emergency credentials through recruitment and retention efforts, and implement credential agreements to ensure staff are working towards the appropriate credential. Despite these assurances, however, both the number and decreasing trend of teachers with a “regular” credential (specifically preliminary and clear credentials) create significant concerns for the District. This is shown in the chart below.



Based on public data (available for school years 2020-23), the percentage of staff at PS7 with “Ineffective” (i.e., sub-permit, Provisional Intern Permit (PIP), Short Term Staff Permit (STSP), or no credential) status was 8.8% in 2020-21, 19.8% in 2021-22 and 48% in 2022-23. At SCHS, those percentages were 6.4% in 2020-21, 14.4% in 2021-22 and 63% in 2022-23. SHPS leadership has been forthcoming in acknowledging that the change of leadership at the start of the 2022-23 school year left the organization with an unprecedented number of vacant positions. This change in leadership may account for the teacher vacancies that school year; however, it does not account for the rates in prior years.

As 2023-24 data is not yet available for public access, District legal counsel reviewed staff lists provided by SHPS against information in the Commission for Teacher Credentialing’s (“CTC”) publicly accessible database. With respect to PS7, only 3 out of 29 teachers listed (10.3%), including special education staff, could be verified as possessing clear teaching credentials. All other teachers held only preliminary or provisional credentials, or sub-permits. In addition, 16 of

the 25 teachers on staff at PS7 (64%) were serving under waivers or permits that expired at the end of June/beginning of July or will expire as of September 1, 2024 – all of which are not renewable. For SCHS, not one of the 19 teachers listed, including special education staff, could be verified on the CTC public lookup as possessing clear teaching credentials (0%). All the listed SCHS teachers held only preliminary, provisional or sub credentials.

There are also discrepancies between the staff lists that SHPS provided for review and the data reported by the state in the California Department of Education's ("CDE") DataQuest database. For example, in 2022-23, DataQuest shows PS7 as having 23.1 teaching FTE (i.e., full-time equivalent); however, the credential information provided by SHPS lists 16 teaching staff, and the master schedule suggests at least 26 teaching staff. Also in 2022-23, DataQuest shows SCHS as having 10.0 teaching FTE, while staff lists from SHPS suggest that there were anywhere between 6 and 13 teachers.

For special education, SHPS provided a staff list that identified 15 staff members providing specialized academic instruction ("SAI") services to students enrolled in both PS7 and SCHS. Based on that review, 2 of those individuals had valid special education teaching credentials, 2 could not be found on the CTC public lookup, 7 had been serving under 30-day emergency sub-permits, and 3 were working under non-renewable STSPs. For those who only possessed a substitute teaching permit, they would have been permitted to substitute teach for no more than 20 days for any one teacher during the school year. Consequently, given these restrictions, it is unclear how PS7 and SCHS were able to appropriately staff their special education classrooms and programs, unless there were additional and unidentified substitute teachers and/or staff who provided instruction at other times during the school year.

While there may be a plausible explanation for these findings, taken collectively, they underscore the District's concerns regarding whether SHPS can successfully implement the respective programs of PS7 and SCHS with regard to staff qualifications and the accurate reporting of data to the authorizer and state agencies. This is critical to ensure students enrolled in PS7 and SCHS receive a high-quality education as promised in the respective charters, and as mandated by the law. Employing and retaining qualified teaching staff is critical to fostering a sound educational program for students and essential to improving student outcomes.

The District understands that SHPS has recently removed human resource functions from its services agreements with SHA and brought these functions back to SHPS, but it remains unclear as to specifically how this change will resolve these staffing issues. Therefore, the District would hope to see SHPS develop a comprehensive corrective action plan detailing the manner in which it will remedy the staffing, credentialing and vacancy issues above.

C. Potential Conflict(s) of Interest Under Government Code Section 1090 and Political Reform Act of 1974 (Government Code sections 81000 *et seq.*)

Relevant Law/Charter Provisions

The District has concerns regarding SHPS's governance structure and fiscal practices, which appear to violate conflict of interest rules applicable to charter schools, including Government Code sections 1090 *et seq.* ("Section 1090") and the Political Reform Act of 1974 (Government Code sections 81000 *et seq.*) ("PRA").

Education Code sections 47604.1(b)(3) and (4) provide that a charter school and an entity managing a charter school are subject to the requirements of Section 1090 and the PRA. Section 1090 strictly prohibits officers, employees and other members of a local agency from making any contract in their official capacity in which they are financially interested. Importantly, the “making” of a contract is not limited to the technical signing of a contract. Rather, it can also include participation in negotiations, discussions, reasoning or planning regarding the contract. (*Stigall v. City of Taft*, 58 Cal.2d 565, 569 (1962).) Similarly, the PRA prohibits public officials from using their official position to influence decisions in which they have a personal financial interest. This is significantly more broad than Section 1090 because it prohibits not only the “making of a contract” but also *any participation in or influence on any governmental decision*. (See 2 C.C.R. § 18700.)

One of the overarching purposes of the conflict of interest rules is to prevent self-dealing and ensure that every public officer “be guided solely by the public interest, rather than by personal interest when dealing with contracts in an official capacity.” (*Thomson v. Call* (1985) 38 Cal.3d 633, 650; 101 Ops.Cal.Atty.Gen. 92.)

California courts have construed the term “financially interested” broadly and have professed that Section 1090 “cannot be interpreted in a restricted and technical manner.” (See *People v. Honig* (1996) 48 Cal.App.4th 289, 315; *Stigall v. City of Taft* (1962) 58 Cal.2d 565, 569.) Section 1090 is “concerned with *any* interest, other than perhaps a remote or minimal interest, which would prevent public officials from exercising absolute loyalty and undivided allegiance to the entity they serve.” (*Finnegan v. Schrader* (2001) Cal.App.4th 572, 579.) Further, Section 1090 is intended “to remove or limit the possibility of any personal influence, either directly, or indirectly, which might bear on an official’s decision.” (*Stigall*, 58 Cal.2d at 569.) The defining characteristic of a financial interest for Section 1090 is “whether it has the potential to divide an official’s loyalties and compromise the undivided representation of the public interest.” (*Eden Twp. Healthcare Dist. v. Sutter Health* (2011) 202 Cal.App.4th 208, 211.)

Similarly, under the PRA, an official must not have a disqualifying financial interest in an entity. A disqualifying financial interest occurs where the government decision will have a reasonably foreseeable material financial effect on the official or that individual’s family, which is distinguishable from the effect on the public generally. (See 2 C.C.R. §18701.) Whether a decision is material depends on the type of interest involved. For instance, a government decision will have a material effect on a business if the business is explicitly involved in the governmental decision, if the business offers to sell a product or service to the agency, or bids/enters a contract with the agency. (2 C.C.R. §18702.1.) To that end, an official may not make, participate in, or influence a governmental decision in which the official has a disqualifying interest. (2 C.C.R. §18704.) Importantly, this rule does not require a financial benefit directly to the official. Rather, the focus is on whether there is a material financial effect on the entity in which the official has an interest.

Alleged Violation: Financial Interest Among SHPS, SHA, and SHDC / Potential Gift of Public Funds

Though SHPS has maintained that SHPS, SHA and SHDC are independent entities, findings from CW’s and F3 Law’s investigations, in addition to the findings of SHPS’s own audit firm, speak to the fiscal interrelatedness of the three entities. Financial documents were not provided by SHA or SHDC. However, CW located public records which showed that SHPS’s payments to

SHA and SHDC for back office and other services amounted to between 51-66% of combined revenue to these entities between 2019-2023. Based on this information, CW concluded that the level of activity between the organizations could cloud the decisions and diminish transparency and market competition for services (See CW Report, page 9).

As part of its review, CW analyzed the 2023-24 service agreements and the recently approved 2024-25 consultant agreements between SHPS and SHA/SHDC using market data to determine if the costs reflected in these agreements appeared to be above, at, or below industry costs for similar services. CW also reviewed publicly accessible financial records for all three entities dating back to 2019-20. SHPS, however, was not able to provide formulas, time accounting or other documentation supporting how the rates for these services were calculated.

Overall, the total costs charged by SHA and SHDC under the respective service agreements between SHPS and SHA/SHDC have declined in recent years as SHPS has shifted more services in house. However, when considering that the costs for services still represent approximately 60% of combined revenue, this suggests that SHA/SHDC maintain a significant financial reliance on the agreements with SHPS.

In the recently approved 2024-25 consultant agreements for services between SHPS and SHA/SHDC, there are three broad categories of services. Specifically, SHA has contracted to provide back-office financial services to SHS at a cost of \$300,000. Additionally, SHDC has contracted to provide facilities management and information technology at a cost of \$575,000. Neither of these amounts seems unreasonable based on the scope of work delineated in the agreements – assuming such services are provided in a manner consistent with such scope. The third category of services includes community engagement, internships and community service, parent education and management of the student store. These non-back-office services total \$610,000 annually, representing two-thirds of the total back-office costs charged by SHA to SHPS.

As reflected in the CW Report, CW conducted a “What-If” analysis which evaluated the range of costs that back-office providers in the private sector charge, as well as a comparative analysis of the general administrative costs of small similarly sized school districts. Based on that analysis, CW concluded that the total package of fees charged by SHA/SHDC for services appear above market, even up to \$1.1M higher.

During a joint meeting with representatives from CW, SHPS and the District, SHPS Superintendent Ruda stated that there are the additional “community service” type activities that SHA provides to the students and parents of SHPS. However, these services are not included in the Local Control and Accountability Plans (“LCAPs”) for PS7 or SCHS and, therefore, are not directly tied to measurable student outcomes in a transparent way. This is particularly concerning if public funds were used for charitable or other activities not related to a public education purpose. No matter how worthy the cause, such expenditures could constitute an impermissible gift of public funds in violation of Article XVI, Section 6, of the California Constitution.

Lastly, CW found that the overall costs of SHA/SHDC employee salaries, benefits and other expenses seem reasonable when reviewing the Form 990s. Nevertheless, CW recommended that SHA/SHDC use more formula-driven methods to allocate costs between SHPS and SHA/SHDC,

and to justify the service charges and their nexus to PS7's and SCHS's educational programs and student outcomes (See CW Report, page 21).

The fiscal dependence of SHA/SHDC on SHPS raises concerns about the ability of SHPS to make objective and market-based decisions regarding an array of essential services critical to the operation of a charter school. The District will address this point further in the following section.

Alleged Violation: Interrelated Roles Within SHPS, SHA, and SHDC

The analysis completed by CW, as reflected in the CW Report, showed several individuals holding interrelated roles within SHPS, SHA/SHDC. At the start of the 2022-23 school year, Cassandra Jennings became the Board Chair of the SHPS Board of Directors. Mrs. Jennings also holds the role of CEO for both SHA and SHDC. As CEO of SHA/SHDC, Mrs. Jennings signed the service agreements between SHPS and SHA/SHDC, though the minutes of SHPS's Board of Directors reflect that she recused herself from the vote. As Board Chair for SHPS, Mrs. Jennings is responsible for leading the Board through review of financial statements being prepared by the agency and staff she oversees in her role as CEO. Given that SHPS is a significant source of revenue for SHA/SHDC, coupled with the concerns described above regarding SHA/SHDC's failure to follow GAAP, these interrelated roles appear to constitute an impermissible financial conflict of interest.

In addition, Kevin Hiestand appears to be a former or current governing board member of the St. Hope Endowment (a fourth entity). The Law Offices of Fred and Kevin Hiestand is listed as a tenant of the SHA-owned property at 3418 3rd Avenue ("the Huey P. Newton House"). Mr. Hiestand has served as legal counsel to SHPS on some matters, which included investigating staff allegations of other staff providing alcohol to students. While the redacted records of the investigation provided for review suggest a reasonable and thorough investigation of the matter was performed, leading to a determination that the allegations were unfounded, it is a further example of the interrelatedness between and among the multiple SHPS entities.

At the very least, Mrs. Jennings' and Mr. Hiestand's personal financial interests have the potential to create divided loyalties between SHPS and the other SHPS-connected entities that are directly compensated by SHPS for the services they provide. Taken in conjunction with the fiscal reliance of SHA/SHDC on SHPS described above, the potential for conflict of interest is heightened. The district still finds this structure to be concerning and vulnerable to financial abuse by those managing and serving in leadership positions within the various entities.

SHPS has expressed that its current contractual arrangements with SHA and SHDC are beneficial to PS7 and SCHS because of the unique set of services provided by SHA/SHDC to effectuate charter school operations. While acknowledging SHPS autonomy to seek out services to serve students, the District hopes to see SHPS identify specific actions it will take to unwind, clarify or resolve the interrelatedness of the SHPS-connected entities, any financial interests held by officers/board members, and the holding of incompatible offices (e.g., resignation from position or Board role, establishment of time-accounting records for services provided, etc.).

III. OPPORTUNITY TO CURE

As detailed above, the District has serious concerns regarding the governance, fiscal and operational aspects of PS7's and SCHS's charter schools. The District hopes that SHPS will take the issues raised in this Notice seriously and make a concerted and thoughtful effort to address those concerns in a meaningful way. To that end, SHPS shall have a reasonable opportunity to remedy or refute the above-described violations/concerns. Please provide a detailed, written response to the District addressing each of the identified violations/concerns by no later than **Monday, August 26, 2024, at 5:00 p.m.** SHPS is encouraged to enclose a corrective action plan and supporting documentation evidencing any actions it has taken to address and/or to refute the violations. Please submit SHPS's response to the following:

Sacramento City Unified School District
Attn: Lisa Allen, Superintendent
5735 47th Avenue, Sacramento, CA 95824
Superintendent@scusd.edu

After the conclusion of the reasonable opportunity to remedy or refute the violations/concerns, the District will evaluate SHPS's response to the Notice and supporting evidence, if submitted. If SHPS does not successfully correct, establish a viable corrective action plan or otherwise refute the violations/concerns described herein, the District may use this information to support one or more denial findings that SHPS is demonstrably unlikely to successfully implement the program(s) set forth in the PS7 and SCHS Renewal Petitions.

To reiterate, it is the shared interest of both the District and SHPS to ensure that students are provided opportunities to learn, grow and reach their greatness so that they may graduate with the greatest number of postsecondary choices from the widest array of options. Fiscal management and governance, such as the areas described in this Notice, are foundational to this goal. The District is hopeful that this process will result in a collaborative opportunity to restore a strong foundation for serving students.

The District appreciates SHPS's immediate attention to this matter.

Sincerely,



Lisa Allen
Superintendent

cc: Board of Trustees, Sacramento City Unified School District

Enclosed:

- Final AUP Report completed by Christy White Accountancy Corporation and Supporting Documents/Exhibits
- Summary Report of Investigation prepared by SCUSD Staff



Certified Public Accountants serving
K-12 School Districts and Charter
Schools throughout California

July 17, 2024

Sacramento City Unified School District
5735 47th Ave.
Sacramento, CA 95824

Re: Agreed-Upon Procedures over St. Hope Public Schools, on behalf of Sacramento City Unified School District

Christy White, Inc. (CW) has performed the agreed-upon procedures enumerated below for Sacramento City Unified School District (SCUSD). The agreed-upon procedures were to be performed solely to assist you in **reviewing the administrative structure and reasonableness of Back-Office Services (Charter Management) costs charged by St. Hope Academy (SHA) and St. Hope Development Corporation (SHDC) for services provided to St. Hope Public Schools (SHPS)**. SHPS operates two charter schools, St. HOPE Public School 7 and Sacramento Charter High School. SCUSD has sponsoring agency oversight responsibilities for both charters.

The agreed-upon procedures engagement was conducted in accordance with the attestation standards established by the American Institute of Public Accountants and the Association of Certified Fraud Examiners. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below, either for the purpose for which this report has been requested or for any other purpose.

Agreed Upon Procedures (AUP) Results

About the Data: CW requested organizational and accounting records for all St. Hope affiliated organizations (as listed at St. Hope.org website) from Supt. Lisa Ruda of SHPS. We were provided with the requested organization documents for SHPS but not for the back-office and management services of SHA, nor the facilities/procurement and information technology arm that is SHDC. CW was able to find data from publicly available documents, and combined with the data provided by the district was able to complete the AUP analyses that follows.

Publicly available data included the most recently published Form 990 for the 2022-23 fiscal year (and prior years), the California Secretary of State's Office, the California Department of Education, audit reports for SHPS, and the organizations' website.

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**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

Executive Summary: Based on the agreed-upon procedures performed in this report, below is a summarization of the key results:

1. **AUP#1 Governance, Inter-Related Roles:** There are inter-related roles that individuals hold amongst the four St. Hope organizations, most notable is Cassandra Jennings as the CEO of SHA, SHDC, the St. Hope Endowment and at the same time Board Chair of SHPS. SHA does not have obvious board control over SHPS, but CEO Jennings likely has a role developing the back-office Agreements for Services and chairs the SHPS board. She recused herself on the back-office services agreement vote but signed the contracts. The fact that over 50% of SHA's revenues and 100% of SHDC's revenues (in 2022-23) are from these agreements might create conflicts of interest and lack of marketplace competition for similar services.
2. **AUP#1 Governance, Board Minutes:** There may be an Education Code Section 35145 violation because SHPS had no minutes of meetings posted for the 2023-24 fiscal year (as of July 13, 2024, per SHPS website), and minutes were not included with the posted agenda.
3. **AUP#1 Governance, SHDC's Community Development Mission:** SHDC's mission is "the betterment of the community through real estate development and an increased quality of life through job training and employment opportunities." The mission does not mention charter schools or K-12 education, and over 100% of the SHDC operating expenses in 2022-23 were charged back to SHPS ostensibly for IT services, facilities management and procurement (per the 2023-24 SHDC contract.)
4. **AUP#2 Financial Reporting/Audits:** The most recent independent audit of SHPS reported a material weakness in financial reporting internal controls for at least two years (the auditor's 2022-23 finding and prior year finding). According to the auditor, the books were not kept on a Generally Accepted Accounting Principle (GAAP) compliant basis. The auditor made numerous adjustments, effectively closing the books that should have been closed by SHA. In addition, bank reconciliations were not being done in a timely manner or reviewed, and SHA had difficulty locating records for the auditor, creating a need for an extended audit report due date.

A back-office provider is at its core an accounting and finance operation and to not be able to prepare GAAP compliant financial statements, prepare timely bank reconciliations and locate accounting records is a major deficiency. This is especially true when compounded by the appearance of above market back-office fees found in AUP#4. CW observes that the SHPS could competitively bid out these accounting services to private sector back-office providers with an objective of finding significant cost savings and improved service quality.

5. **AUP#3 Tests of SHPS' Direct Charged Payroll Expenses:** We found two employees paid on warrants for stipend activities and not through payroll. Also, one former employee is now an independent contractor but appears to be doing similar work as done as an employee. These instances could result in a payroll tax issue for the SHPS organization.

Agreed Upon Procedures (AUP) Results, Cont'd

Executive Summary, Cont'd:

6. **AUP#3 Tests of SHPS' Direct Charges Vendor Expenses:** We found two vendors on retainers for services that, in our experience, are not frequently needed and would not warrant a retainer relationship by charter schools. The retainers were:
 - a. One was for a public relations firm for \$5,000 per month or \$60,000 per year.
 - b. The second was a photography and videography firm for \$6,000 per month or \$72,000 per year. This firm then charges \$100 per hour beyond the retainer, so the retainer of \$6,000 a month implies that 60 hours of work is done, on average, per month for 12 months. This is a lot of photography and videography for SHPS with less than 900 students.
7. **AUP#4 Justification of Back-Office and Management Services Charges:** There was no detailed justification provided to CW's request to SHA/SHDC for the \$1.8M in the service agreements charged to SHPS in 2022-23. The service charges are significant to SHA/SHDC's revenue stream. SHA/SHDC has charged varying amounts annually, during the first Covid year of 2019-20 SHPS funded 66% of their total revenue, and today it's 51%. Agreements for the new fiscal year, 2024-25, were just approved and had more details as to what categories of services would be provided and for how much. But the new agreements still lacked specificity on estimated hours of service, how performance would be measured and a "right to audit clause" which would be typical for a major service contract such as this. Also, SHPS did not get quotes for the contracts' sizeable non-fiscal services to test the marketplace cost of the services or assess the educational value.
8. **AUP#4 Market Comparison of Back-office and Management Services Charges:** CW compared market value of back-office service costs to a "What If" analysis for reasonableness, to other charter back-off providers and to small similarly sized school districts. In all analyses, the results showed the above market charges, even as high as \$1M. And SHDC charged SHPS more operational costs (111%) than reported in 2022-23 (per the Form 990), which indicates a lack of formulas to justify the costs and possibly poor inter-agency accounting. It appears that the \$1.8M charged by both SHA and SHDC may be helping to subsidize the non-charter school community development activities of these organizations. In response, Supt. Ruda pointed out these community activities do provide educational content and value.
9. **AUP#4 Nature of Contracted SHA Services:** In the newly executed 2024-25 Consultant Agreements for services between SHA/SHDC and SHPS, there are services being purchased by SHPS such as community engagement, internships and community service, parent education, and management of the student store. These non-back-office services totaled \$610K annually, 2/3rds of the total back-office costs charged by SHA to SHPS. The amounts, for the nature of the services, seem high for SHPS with less than 900 pupils. Demonstration of the past and future delivery on the contracts and the nexus to educational programs and outcomes are key. According to SCUSD's records these community services were not included in the Local Control and Accountability Plans (LCAP) for either of the SHPS charters, and therefore are not tied to measurable student outcomes.

**Agreed-Up Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #1: Document the organizational structures and relationships between St. Hope Academy (SHA), St. Hope Development Corporation (SHDC), and St. Hope Public Schools (SHPS).

- a. Obtain organizational documents and recent tax filings for all entities.
- b. Identify corporate officers, board members, and any overlapping roles between entities.
- c. Document the compensation of each entity's corporate officers and board members.
- d. Document the nature and amounts of transactions between the entities.

AUP #1 Results:

There are five affiliated organizations, as shown in the table below. The appendix includes supporting documentation.

Entity	St Hope Public Schools	St. Hope Academy	St. Hope Development Corp.	St. Hope Endowment	Stand Up for Sacramento Schools
EIN	01-0582508	68-0193050	68-0474831	94-3297342	27-1384265
Tax Status	501(c)(3)	501(c)(3)	501(c)(3)	501(c)(3)	501(c)(3)
Date Established	12/19/2001	7/12/1989	3/26/2001	3/26/1998	11/24/2009 (suspended)
Gross Revenues					
2022 Form 990	\$ 13,605,349	\$ 2,482,107	\$ 514,629	\$ 104,611	\$ 98

St. Hope Public Schools (SHPS) is a California Nonprofit Public Benefit Corporation that operates two charter schools: St. HOPE Public School 7 and Sacramento Charter High School. Two district-owned facilities are used. The elementary school operates at 5201 Strawberry Lane, Sacramento, CA 95820, and the middle and high schools operate at 2315 34th St., Sacramento, CA 95817.

St. Hope Academy: SHA was founded by Kevin Johnson in July 1989 as an after-school program. The main office is located at 3033 Martin Luther King Jr Blvd, Sacramento, CA 95617. In reviewing the Form 990:

- ✓ SHA provides back-office services like a Charter Management Organization to SHPS. SHPS paid SHA a total of \$1.32M in FY22-23 according to tax-exempt organization Form 990 and the audit report. Back-office service fees account for about 43% of SHA's revenues. (Plus, SHDC received about \$500K in fees from SHPS for property management, IT, and purchasing services – this is 100% of SHDC's revenue.) Total revenue from SHPS for SHA/SHDC was 51%.
- ✓ The balance of SHA revenues is comprised of rents from business-leased properties, inventory sales, grants, contributions, and gifts. Management, community development, maintenance, and event planning activities (for example) for SHA's operations are likely to require significant staffing resources and volunteer coordination.
- ✓ SHA had a \$685,238 due from related parties' assets on its books as of June 30, 2023. However, there was no corresponding due to related parties' liability on either SHPS or SHDC's Form 990. Without more detail and inability to verify, the amount on SHA's Form 990 could be mischaracterized or not properly recorded on the related entity.

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #1 Results, Cont'd

St. Hope Academy, cont'd:

Total wages of \$1,052,864 were reported by SHA on the 2021-22 Form 990, in which \$847,947 was for compensation of officers and directors and \$205,023 listed as "other salary." In 2022-23, key salaries were reduced to \$448K and all other salaries increased to \$503K. No board members reported receiving compensation.

The table below shows the key executive salaries reported for each year by name and position. SHA is charging back-office services amounting to \$1.3M according to Form 990, which would presumably include covering costs of certain salaries. The back-office fees cover 58% of SHA's total expenses of \$2.3M. Under AUP#4, CW analyzed further whether the allocation of cost is reasonable for the services provided to SHPS.

Reported Compensation of Key Executives in Fiscal Years 2021-22 and 2022-23

Names	Positions	SHA Salaries Reported on Form 990 in 2021-22	SHA Salaries Reported on Form 990 in 2022-23	Comments
Jacob Mossawir	CEO	\$ 324,908	\$ -	Mossawir stepped down in 2021-22, pay in 2021-22 was \$237,600 and in 2020 about \$250,000
Cassandra Jennings	CEO	90,107	191,074	21-22 was partial year moved from CPO to COO
Adrienne Hall	CPO/COO	124,442	139,718	position
Riley Hyeck	COO	109,429	-	position may have been eliminated
Theodore Reitermain	CFO	88,561	117,331	
Tiffany Fraizer	Recruitment (Independent Contractor)	110,500	none listed	activity maybe expensed under SHPS or under \$100K and not reportable
Total Key Executive Salaries		\$ 847,947	\$ 448,123	
Other Salaries		205,023	503,419	
Total Salaries (exc. Benefits and Payroll Taxes)		\$ 1,052,970	\$ 951,542	

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #1 Results, Cont'd:

From the SHA website, there are six real property locations in addition to the main office and excluding the charter school facilities:

- ✓ **"40 Acres"** in Oak Park on Broadway and 35th St., Sacramento. Underground Books and The Guild Theater operate on the property, which offers special events and speaker series for the benefit of the Oak Park neighborhood. Year-round events appear to be held at the complex, which celebrates students, hosts teachers, provides block parties, hosts film festivals, and invites notable speakers.
 - Tenant space is leased out and is the home to Fixins Soul Kitchen, World Class Faders, and The Upper Rooms. (Note: SHDC is an investor in Fixins Restaurants.)
 - The bookstore appears to have had net sales of \$535K in 2022-23. The theater reported no income in 20-21 but may have resumed operations post-Covid.
- ✓ A separate property at 3418 3rd Ave., Sacramento, the **Huey P. Newton House** is leased out to tenants as office space to the Law Offices of Fred Hiestand and Kevin Hiestand, former and current board members, and Munay Accounting.
- ✓ SHA also operates the **St. Hope Business Complex** at 3428 Alhambra Blvd in Oak Park and rent space to the Asian Chamber of Commerce, City Year, and the Urban League.
- ✓ The **St. Hope Education Complex** was purchased by the SHDC and renovated. Teach for America and College Track occupy this building.
- ✓ **The Oak Park Victorian** was renovated by SHDC and is leased out. It is located at 3734 Broadway, Sacramento, CA.
- ✓ **The St. Hope Academy Building**, the original after-school center, is now occupied by the Triumph Center for Early Childhood Education. Located at 4104 MLK Jr. Blvd., Sacramento, CA.

Rents reported on the leased properties on the 22-23 Form 990 were \$259,177. This amount appears low compared to the number of properties seemingly leased to outside organizations but there is no data to support the collections, as the general ledger was not provided to CW, when requested.

**Agreed-Up Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #1 Results, Cont'd:

St. Hope Development Corporation (SHDC) is listed as a community and economic development organization under GuideStar. Its mission is "the betterment of the community through real estate development and an increased quality of life through job training and employment opportunities." **\$490K of its revenue (it appears nearly 100%) comes from SHPS charters, but charter schools are not mentioned as part of its mission.**

SHDC lists in 22-23 an \$8.9M building and land asset (with related accumulated depreciation of \$2.4M). There is a \$3.8M mortgage and \$5M in other liabilities described as federal income taxes. This could be New Market Credits, a loan forgiveness program and possibly related to the opening of a new business and education complex in 2018.

As of June 30, 2022, net assets were negative \$1.3M. There is an asset for "Fixins Investment" of \$300,300 plus "Tenant Incentives" of \$127,435. Fixins Sacramento is the founder Kevin Johnson's owned LLC, which operates soul food kitchen restaurants. There is also an outstanding loan of \$1.6M to Kevin Johnson, described as capital.

SHPS pays SHDC about \$500K annually for property management, procurement, and IT services; there is no other reported income source. In SHA, \$253,000 in rent was reported. CW knows from SHA's website that six properties plus the headquarters are operated in the community development area and are unrelated to the charter school properties. To charge all SHDC operating costs (ex. depreciation), to SHPS does not make sense. Some, perhaps even the majority, of the costs would be attributable to the community properties, many of which are under lease from tenants. (Note: no current financials were provided to CW for either SHA or SHDC, and the Form 990's were publicly available and used for this analysis.)

CW noticed in the 23-24 budget for SHPS that IT Services are budgeted as a separate line item for each school, which totals \$100K. SHPS said that their line-item was for specific infrastructure separate from SHDC IT services.

Governance Structure: The table on the following page has the most currently available list of key administrators and board members for each organization and identification of the inter-related organization roles.

Note on Data: The St. Hope website data does not provide board officer information but the Form 990s do provide information. St. Hope Endowment's information is from the filed Form 990 and the SHA website does not mention the endowment board.

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #1 Results, Cont'd

Governance Structure:

Current Key Administrators and Board Members	Title	Related Organization Roles
St. Hope Public Schools		
Lisa Ruda	Chief of Schools	
Elisha Ferguson	Director of Operations	
Cassandra Jennings	Board Chair	CEO SHA and SHDC, Board Chair SHPS
Janet Rice	Vice-Chairperson	
Dr. Stephanie Walton	Board Secretary	
Carolyn Veal-Hunter	Board Member	
Ronald West	Board Member	
Angelia Dickens	Board Member	
Dr. Ron Tom	Board Member	
Gladys Mitchell	Board Member	
Kathy McKim	Board Member	
St Hope Academy		
Cassandra Jennings	CEO	
Adrienne Hall	COO	On the board of SHDC
David Chavez	CFO	
Milutin Backovich	Board President	
Denise Merano	Board Secretary	
F. Frederick Brown	Board Member	
Jake Mossawir	Board Member	Former CEO SHA
Deborah C. Jackson	Board Member	
St. Hope Development Company		
Cassandra Jennings	CEO	
Sam Reed	Properties Manager	
Vijay Pegany	Director of IT	
F. Frederick Brown	Board President	
Brian Williams	Board - role not disclosed	
Jake Mossawir	Board - role not disclosed	Former CEO SHA
Adrienne Hall	Board - role not disclosed	COO of SHA
Stand up for Sacramento (suspended by SOS office)		
Adrienne Hall	Director	COO of SHA, Board SHDC
St. Hope Endowment		
Cassandra Jennings	CEO	CEO SHA, SHDC and SHPS Board Chair
Adrienne Hall	Secretary	COO of SHA, Board SHDC, Board/Director Stand Up
Fred Hiestand	Board President	(father of board member Kevin Hiestand, now deceased)
Kevin Hiestand	Board Member	Law office tenant of SHDC
Patricia Burke	Board Member	

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #1 Results, Cont'd

Governance Structure, Cont'd:

In review of the governance, CW observed that:

- ✓ **Relationships Between the Entities:** Whether the entities are related depends on many factors and there could be differing standards and opinions. The Form 990's, Schedule R for SHA and SHDC do not list SHPS as a related entity, but the SHPS audited financial statements do. In one instance, Schedule R, there is no board control but in the other, GAAP financial statements, there are significant business transactions between SHA and SHDC to warrant related party disclosure. To elaborate:
 - SHPS's payments for back-office and other services to both SHA and SHDC amounted to 51% of combined revenue in 2022-23. And the CEO Cassandra Jennings is board chair of SHPS and CEO of SHA and SHDC.
 - * Note: SHDC lists \$514K in "rents" as the sole source of revenue and the agreement for services provided to SHPS is \$490,629. If the \$490K is not included in the "rent" number on Form 990, then it must be recorded under Contributions on SHA's books. Either way, the amounts are collected and significant to SHA/SHDC.
 - **While there might not be "legal" control, the level of activity between the organizations can cloud educational and financial decisions, diminish public transparency and market competition for services.**
 - In addition, on SHA's website they List "Our Schools" on the front page with descriptions and links to SHPS. From an outsiders' perspective, there is one central entity.
- ✓ **Posting of Board Minutes:** No board minutes for the 2023-24 fiscal year have been posted to SHPS' website as of June 12, 2024, only board agendas. While there might not be a Brown Act violation, ED Code Section 35145(a) below requires that minutes be taken and made available to the public. CW also noticed that SHPS only calendared three board meetings in 2023-24. By comparison there were 6 regular and 1 special board meeting in the 2022-23 fiscal year.
 - Education Code Section 35145
 - a) All meetings of the governing board of any school district shall be open to the public and shall be conducted in accordance with Chapter 9 (commencing with Section 54950) of Division 2 of Title 5 of the Government Code. All actions authorized or required by law of the governing board shall be taken at the meetings and shall be subject to the following requirements:
 - b) Minutes shall be taken at all of those meetings, recording all actions taken by the governing board. The minutes are public records and shall be available to the public.
 - c) An agenda shall be posted by the governing board, or its designee, in accordance with the requirements of Section 54954.2 of the Government Code. Any interested person may commence an action by mandamus or injunction pursuant to Section 54960.1 of the Government Code for the purpose of obtaining a judicial determination that any action taken by the governing board in violation of this subdivision or Section 35144 is null and void.
- ✓ **Turnover in Board Seats:** There has been a majority turnover in the SHPS board seats between the 2021-22 Form 990 reports and 2022-23, seven of the nine members. Cassandra Jennings the CEO of SHA and SHCD was added with the new members and became Chair in Year 1 of being on the board.

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #1 Results, Cont'd:

Administrative Structure: The following administrative positions are on the website for all organizations. CW indicated the assumed role (in whole or part) that such a position would play within SHPS.

Key Executives	Titles	Website Assignment	Assumed Role with SHPS*
Cassandra Jennings	Chief Executive Officer	SHA	Governance None Likely: Manages Economic Development and the theater/bookstore operations
Adrienne Hall	Chief Operations Officer	SHA	HR services
Johanna Harris	Human Resources	SHA	IT support
Vijay Pegany	IT Director	SHDC	IT support
Raul Barrios	IT Manager	SHDC	Facilities Support
Sam Reed	Properties Manager	SHDC	Back-office Accounting
Dru Burks	Guild Manager/Esther's Park Manager	SHA/SHDC	Back-office Accounting
Ricardo Alcauter-Perez	Accounting Specialist	SHA/SHDC	Back-office Accounting
David Chavez	Chief Financial Officer	SHA/SHDC	Back-office Accounting
Lakhvir Singh	Senior Accountant Financial Statements and Audits	SHA/SHDC	None Likely: Community Events
Brandy Dean	Special Projects Coordinator	SHA/SHDC	School Administrator
Lisa Ruda	Chief of Schools	SHPS	School Administrator
Elisha Parsons	Director of Operations	SHPS	School Administrator
Christina Williams-James	High School Site Lead	SHPS	School Administrator
Kristen Meyer	Middle School Site Lead	SHPS	School Administrator
Lesley Ezero	Elementary Site Lead	SHPS	School Administrator
Sarah Trapp	Special Education Director	SHPS	School Administrator
Sheeana Cahill	Elementary Instructional Coach	SHPS	School Administrator
Ken Powell	Dean of Students	SHPS	School Administrator
Jade Locke	Exec. Asst. and Special Projects Coordinator	SHPS	School Administrator

Source: SHA website

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #1 Results, Cont'd:

Significant inter-related roles include:

- Cassandra Jennings, the current SHA and SHDC CEO (replacing J. Mossawir) is also the Board Chair of SHPS charters.
- Jake Mossawir (also known as Jacob Mossawir) is the former CEO of SHA and SHDC and now is on their board of directors. He was also listed as CEO of St. Hope Endowment when he was CEO of SHA.
- Adrienne Hall has multiple roles as Chief Operating Officer of SHA, and a board member of SHDC, the SH Endowment and Stand-up Sacramento (now listed as suspended by the Secretary of State's office).

SHPS bylaws are included in the exhibits. No other corporate documentation was provided for this study by SHPS, SHA or SPDC.

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #2: Obtain the administrative services agreement between SHA and SHDC, the prior independent auditor's report and the backup general ledger detail of costs charged to the SHPS charters for general and administrative costs.

AUP #2 Results: SHPS provided a general ledger detail, but not SHA and SHDC. Testing of expenses is done in AUP#3. An administrative Statement of Work agreement between SHPS and SHA and SHDC was provided and the independent auditors' report. Copies are included in the attachment and are summarized here:

Service Agreements between SHPS and SHA and SHDC: The 2023-24 SHA/SHPS agreement calls for SHA to provide budget, fiscal, audit support, governance support, HR services, grant reporting, community relations and limited food service contract support. The agreement for SHDC is for facilities management, procurement and information technology services. See AUP#4 for additional work performed.

At the June 22, 2023, SHPS board meeting, the board chairperson Cassandra Jennings (who is also the SHA and SHDC CEO) had signed the statement of work contracts between SHA and SHDC and SHPS. Jennings did abstain from the vote that approved the contracts.

Independent Auditors' Report: CW was provided with the 2022-23 audit report of SHPS, dated March 4, 2024. No audit reports were provided for the SHA/SHDC organizations.

- ✓ The auditor had a **material weakness audit finding** for at least the last two audit years (2021-22 and 2022-23), stating that the books were not being kept on a Generally Accepted Accounting Principles (GAAP) basis, revenue was not recognized on a GAAP basis and bank statements were not reconciled timely with proper review.
- ✓ A material weakness is the most serious of internal control deficiencies. It is defined as "a deficiency such that there is a reasonable possibility that a material misstatement of the School's financial statements will not be prevented, or detected and corrected, on a timely basis." From our experience as auditors, material internal control weaknesses increase the risk of fraud, as well.
- ✓ The auditor made numerous audit adjustments that were needed to create full-accrual GAAP-compliant financial statements. The number of audit adjustments is **exceptionally high, based on our experience as auditors.**
- ✓ The audit release due date was extended beyond Dec. 15, 2023, due to complications in completing the audit. The Interim SHA CFO Sandra Moorman said in the extension request: "We are requesting additional time to locate specific documents..." CW notes that this was an audit of the recently closed fiscal year; all accounting records should have been organized and available for audit.

GAAP accounting is expected of a back-office provider and part of any basic service. It appears that SHA was keeping a basic checking account record but not full financials. And there were issues with timely review of bank statements and locating accounting records. Given this, **the quality of the accounting and financial reporting services provided by SHA appears inferior to industry norms, plus SHPS paid premium rates** (see AUP#4).

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #3: Through sampling, obtain reasonable assurance that the administrative services costs are supported by documentation and reasonable internal controls exist, testing:

- a) Schedules for the cost of services are based on actual monthly postings charged to SHPS.
- b) Non-personnel charges are supported by actual invoices, purchase orders, and shipping documentation, as applicable.
- c) Personnel charges are supported by employment records and payroll records.
- d) Use of independent contractors is documented by approved contracts and tax documentation, and the fees appear reasonable within the charter school industry.

AUP #3 Results: SHPS is invoiced for back-office services according to the agreements described in AUP#2. CW asked for any formulas, time accounting or other reasonable and documented basis for the back-office services fees and was not provided with any justification to support the charges.

- ✓ SHA and SHDC are not independent of SHPS in any practical way since a majority of each organization's revenues come from SHPS and there are long-standing interorganizational relationships. To justify the back-office services fees charged, provide public transparency and accountability, and be efficient with educational dollars, it would be best practice that justification be done to establish the necessity and reasonableness of fees to be charged to SHPS each fiscal year.

Testing of SHPS Expenses: CW pulled payment check disbursement samples (two months selected to test) and requested the invoice and contracts for the following checks. We were looking to see if payments were supported by invoices, purchase orders and contracts where applicable.

- ✓ KP Public Affairs \$5,000 paid 2/7/24
- ✓ James Scheible, \$28,000 paid 8/8/23
- ✓ Nicole Michalik, paid \$7,220 2/1/24
- ✓ Nicole Michalik, paid \$9,722.50 8/2/24
- ✓ Kevin Hiestand, paid \$4,000 8/2/24
- ✓ Bains, Kirandeep, paid \$3,165.42 8/2/24
- ✓ Arrows Digital Media, paid \$6,000 8/2/23
 - ✓ Fantasia Hilliard, paid \$925 8/2/23
- ✓ Renaissance Learning, paid \$6,000 8/2/23
 - ✓ Lisa Ruda, paid \$1,602.1 8/25/23
 - ✓ Tessa Kelly, Paid \$2,478.49 8/15/23
 - ✓ James Smith, paid \$2,720 2/1/24
 - ✓ Jordan Graves, paid \$4,000 2/7/24
 - ✓ Nnamdi LeBlanc, paid \$3,000 2/7/24
 - ✓ Champs 4 Life, paid \$30,000 2/12/24

Expense testing results: The SHPS was able to provide the invoices and contracts. But some of the services might be atypical for a charter school with under 900 students. For example, public affairs monthly retainer of \$5,000 or \$60K annually. A digital media company hired at \$6,000 per month, also on retainer for \$72K annually. And SHPS contracted out for after-school programs to Champs 4 Life for \$286K for 131 days of operation, or \$2,183 per day. While it is common for charter schools to contract out for after-school programs, the costs appear high for the size of the SHPS charters.

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #3 Results, Cont'd:

Expense testing results, cont'd:

Employee vs Independent Contractor Concerns: We found a few examples in our sample tests where either former employees or current employees were paid as independent contractors instead of employees. SHPS might be out of compliance and at risk for payroll tax and penalty assessments by the IRS or State Franchise Tax Board. For example:

- ✓ Vendor Nicole Michalik is a former employee, the Chief Operating Officer of SHPS, leaving in 2014 to become an independent consultant and was paid for services at about .5 of a would-be FTE position in 23-24, based on the two months tested. Ms. Michalik's former job at SHPS mirrors her current business, and yet she was made an independent contractor. And its not evident that she offers services to other organizations.
- ✓ We noted in our test of accounts payable checks that Jordan Graves and Nnamdi LeBlanc are employees of SHPS and were paid stipends of \$4,000 and \$3,000 each in Feb. 2024 through a commercial warrant and not payroll.

All payments to employees should run through payroll and not accounts payable. And careful consideration of the IRS rules on employee vs independent contractor should be considered by the organization.

Payroll Review: CW reviewed two payroll registers for the months of Aug. 2023 and Feb. 2024. Nothing stood out as unusual in total monthly pay. The pay seemed reasonable for the following individuals selected and their position with SHPS:

- ✓ Lisa Ruda, monthly salary \$10,000 – Supt.
- ✓ Betty Jo Anzaldua, monthly salary \$2,558.73 – Special Education
- ✓ Sydney Burgess, monthly salary \$3,125 – Exec. Assistant
- ✓ William Davis, monthly salary \$2,400 – HS Administrator
- ✓ Jordan Graves, monthly salary \$3,140 – Substitute

**Agreed-Up Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #4: Using market data, determine whether SHPS's costs of services reflected in the administrative services agreement, and billed to SHPS, appear to be above, at, or below average industry costs for similar services provided within the charter school industry.

AUP #4 Results: Total expenses SHA reported on Form 990 for fiscal year 22-23 was \$2,296,614, and the total expenses for SHDC, excluding depreciation, was \$443,631. The table below compares these expenses to the back-office services and SHDC costs charged to SHPS (source: 22-23 audit report). SHA allocated 58% of expenses, and SHDC charged 111%, in other words, more costs than incurred to SHPS. Note that SHA and SHDC also own and lease office space in a number of properties, organizes community events, operates a bookstore and theater, and offers speaker series. As such, there would be significant non-charter costs associated with these operations.

Percentage of SHA and SHDC Expenses Allocated to SHPS

Description of Expenses	2022-23 Costs Allocated to SHPS (source: Audit Report, Footnote 10)	Total SHA and SHDC Expenses, exc. Depreciation (Source: Forms 990)	% of Expenses Allocated to SHPS
SHA: CMO Fees - financial, business, HR and board support	\$ 1,321,104	\$ 2,296,614	58%
SHDC - IT, facilities, procurement and property management	490,629	\$ 443,631	111%
	<u>\$ 1,811,733</u>	<u>\$ 2,740,245</u>	

Below is a prior trend schedule of charges by SHA/SHDC to SHPS. Note that the fees were higher in the early years as compared to 2022-23. At the same time, SHPS enrollment has declined by about 11% over this same period.

Trend in the Percentage of SHA/SHDC's Revenues and Expenses Charge to SHPS

	2019-20	2020-21	2021-22	2022-23
Total Fees Charged to SHPS	\$ 2,329,776	\$ 2,329,776	\$ 1,811,733	\$ 1,811,733
Total SHA and SHDC Revenues	\$ 3,539,663	\$ 4,165,769	\$ 2,996,736	\$ 3,558,335
Fees as a % of Revenues	66%	56%	60%	51%
Total SHA and SHDC Expenses	\$ 4,020,101	\$ 3,915,932	\$ 3,104,866	\$ 2,999,510
Fees as a % of Expenses	58%	59%	58%	60%

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #4 Results, Cont'd:

Agreement for Services Contracts with SHA/SHDC and SHPS

For the 2023-24 year, CW was provided with the 2023-24 agreements which listed services to be provided and a grand total of costs. CW was not provided with SHA/SHDC financials nor any justification for the total cost amounts. For example, what positions were included, how much of their time was spent on the charter schools as opposed to community activities, and how the cost broke down by service area. While this might not be expected of an arms-length vendor, SHPS did not shop the prices for reasonableness and the relationship between the organizations does not appear at arms-length. Specifically, because all organizations are operated publicly under the St.Hope.org website, the inter-related roles and the significance of the SHPS revenues to SHA and SHDC's budgets.

For the 2024-25 year, SHA/SHDC and SHPS just approved new agreements for services, included in the attachments, that are more detailed than previous contracts. In a meeting with Lisa Ruda, Supt. of SHPS, they shopped for the first time at other back-office providers to obtain comparable fees. But the fiscal portion of the agreement is only 1/3rd of the total SHA services to be paid.

In the newly executed 2024-25 Consultant Agreements for services between SHA/SHDC and SHPS, there are services being purchased by SHPS such as community engagement, internships and community service, parent education, and management of the student store. These non-back-office services totaled \$610K annually, 2/3rds of the total back-office costs charged by SHA to SHPS. While these types of costs might be spent by other charter schools, the amounts seem high for SHPS with less than 900 pupils. Demonstrating good delivery results on the contracts, the nexus to educational programs and educational outcomes would be a good practice for the SHPS.

The What If To help evaluate what is reasonable for back-office services and maintenance/procurement/IT costs billed by SHA and SHDC, CW did a "what if" based on positions within the SHA/SHDC organizations and looked at other charters and small school districts for their costs of similar services.

On the next page, CW uses broad assumptions based on available data, CW's industry expertise and researching the nature of the SHA and SHDC work.

In the 2024-25 service agreements, there were amounts charged for "community activities" that are described as having an educational benefit to students and parents. The market and educational values of these relationships were not evaluated nor included by CW in the analysis. These added services could be educational priorities which justify associated costs but, in our experience, these are not typical costs of charter schools.

**Agreed-Up Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #4 Results, Cont'd:

"What If" Allocation of SHA Back-Office Costs with SHPS

Expenditure Description	SHA Expenses Reported on Form 990 in 2022-23	SHPS Allocation %	Dollars Allocated	SHA Allocation %	Dollars Allocated	Assumptions & Comments
<u>Key Executives (22-23 Form 990)</u>						
Cassandra Jennings, CEO	191,074	20%	38,215	80%	152,859	SHPS has a Supt. and site level administrators
Adrienne Hall, CPO	139,718	10%	13,972	90%	125,746	Manages the economic development, theater and book store
Theodore Reltermain, CFO	117,331	70%	82,132	30%	35,199	more time on SHPS
Total Key Executive Salaries	\$ 448,123		\$ 134,318		\$ 313,805	
Other Salaries	\$ 503,419	60%	302,051	40%	201,368	split between back-office accountants, HR and community projects
Benefits	74,972	50%	37,486	50%	37,486	
Payroll tax	72,665	50%	36,333	50%	36,333	
Grants assistance	6,704	0%	-	100%	6,704	SHA has grant income
Legal	1,228	0%	-	100%	1,228	SHA legal
Accounting	36,544	50%	18,272	50%	18,272	not defined
Investment management fees	3,513	0%	-	100%	3,513	SHA costs
Other	385,790	0%	-	100%	385,790	not defined - SHA assumed separate direct charged
Advertising and promotion	113,744	0%	-	100%	113,744	SHPS
Occupancy	197,714	0%	-	100%	197,714	not defined
Travel	32,711	20%	6,542	80%	26,169	mostly SHA
Interest	51,703	0%	-	100%	51,703	SHA home office
Depreciation	120,961	0%	-	100%	120,961	SHA home office
Insurance	46,799	0%	-	100%	46,799	This is a direct charge cost category to SHPS
Books and Supplies	90,515	30%	27,155	70%	63,361	mostly SHA
Misc. Expenses	47,709	0%	-	100%	47,709	not defined separate direct charged
Communications	21,158	0%	-	100%	21,158	SHPS
Other Service Fees	13,531	0%	-	100%	13,531	not defined - SHA
All Other	27,111	0%	-	100%	27,111	not defined - SHA
Total Reported Expenditures	\$ 2,296,614		\$ 562,157		\$ 1,734,457	
			Total "What If" Allocation to SHPS		\$ 562,157	
			Back-Office Costs Charged		1,297,104	
			Excess Charges over What If		\$ 734,947	

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #4 Results, Cont'd:

"What If" Allocation of SHDC Costs with SHPS

Name	SHDC Expenses Reported on Form 990 in 2022-23	SHPS Allocation %	Dollars Allocated	SHA Allocation %	Dollars Allocated	Comments
Other Salaries (IT and Facilities Management)	\$ 338,616	50%	\$ 169,308.00	50%	\$ 169,308.00	SHA has community properties to manage, and an assumed role in school properties (IT services direct charged to SHPS)
Benefits	48,820	50%	24,410	50%	24,410	
Payroll tax	25,013	50%	12,507	50%	12,507	
Accounting	163	0%	-	100%	163	
Office Expense	80	50%	40	50%	40	
Insurance	26,687	0%	-	100%	26,687	separate direct charge SHPS
Janitorial	4,060	0%	-	100%	4,060	separate direct charge SHPS
Payroll Fees	154	50%	77	50%	77	
Travel	38	50%	-	100%	38	
Depreciation	259,265	0%	-	100%	259,265	non-charter properties
	<u>\$ 702,896</u>		<u>\$ 206,342</u>		<u>\$ 496,555</u>	
Total "What If" Allocation to SHPS			\$ 206,342			
Development Corp. Costs Charged			514,629			
Excess Charges over What If			<u>\$ 308,288</u>			

What If Key Assumptions: Most salary costs in SHA and SHDC organizations are for management-level positions. The salaries do not look unreasonable for the type of position. But the charter school sites have their own Superintendent and educational leaders.

SHA provides back-office services primarily in finance, budget, accounting and HR. As SHPS has a Superintendent and site-level administrators there would be less governance and management time spent by SHA on the charter proportionate to time spent on community development activities. SHPS is directly charged for items like insurance, maintenance, advertising, information technology, communications, space rental/lease expense, utilities, operations and custodians, travel and conferences and dues/memberships. None of SHA's costs in these categories would be a part of back-office services.

For SHDC, CW allowed for procurement services, IT services and facilities planning. But SHDC charges 100% of their operating costs to SHPS. It would be reasonable that at a minimum 50% of their time is spent on community development which is in their mission statement.

The What If is an estimation as no formulas or time accountings were provided to CW to support the back-office and SHDC charges. But even with the estimation it appears that excess charges are being charged against SHPS, especially when evaluated with the following additional analyses on known back-office provider fees and comparisons to a small school district, analyzed later in this report.

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #4 Results, Cont'd:

What-If Results: CW found about \$735K in back-office excess charges and \$308K in development corporation charges, for a total of \$1.1M. But there could be community activities that benefit the students outside of the regular classroom and are being charged by SHA/SHDC. These have been described in the new 2024-25 services agreements.

At the same time, the individual salaries, benefits and other expenses in all the St. Hope corporations do not look unreasonable. One conclusion might be that SHPS is subsidizing the community development project costs with the higher-than-expected back-office and development corp. service fees.

Had SHA and SHDC kept contemporaneous time records on the proportional cost spent between the organizations, they would be able to justify the allocated costs to SHPS.

Comparisons to Other Back-Office Providers

CW compared the management fees (excluding facilities, purchasing and IT) to other back-office providers. SHPS is spending between \$1M and \$647K over back-office provider. And this does not include the SHDC charges for IT, purchasing and facilities management. The difference is being attributed to community activities that benefit students and parents, as delineated in the newly approved 2024-25 service agreements.

Comparison of Fiscal Services Costs to Back-Office Providers

SHPS Cost of Shared Fiscal Services (per 22-23 audit)	\$	1,321,104
Total Revenues SHPS	\$	16,855,571
Percentage of Revenues		7.8%
Range of Costs for Fiscal Services		1.5-4% of revenues
4% of SHPS Revenues	\$	674,223
3% of SHPS Revenues	\$	505,667
2% of SHPS Revenues	\$	337,111
1.5% of SHPS Revenues	\$	252,834

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #4 Results, Cont'd:

Comparisons of SHPS to a Small Like-Size School District*

In the comparison below to similar size small school districts on functional expenses, SHPS is spending \$563K more on general administrative services, compared to the average similar sized school district. And this excess is conservatively small since there are direct charges for clerical staff in SHPS's budget and additional SHDC costs charged for some IT and purchasing. It is of interest that the fiscal amounts for the two reporting school districts were about 1.5% of average revenues (on the low but reasonable range that back-office providers charge, see prior page).

* Note: comparisons to charter schools are not available due to the lack of detailed reporting to the State. But a small school district operates like a charter school.

* Comparative Schools	Enrollment	ADA	General Fund Revenues	General Admin** (7200)	Fiscal Only, if Reported Separately
Modoc JUSD	889	750	\$ 16,848,582	\$ 756,288	
Upper Lake USD	1,056	822	21,697,566	1,099,398	
Lassen HSD	922	780	14,737,397	726,823	154,845
Sutter HSD	832	744	12,851,931	497,824	
Santa Ynez HSD	881	805	17,899,039	709,558	338,311
Averages	916	780	\$ 16,806,903.0	\$ 757,978	\$ 246,578
SHA Back Office Costs	872	812	\$ 16,855,571.0	\$ 1,321,104	
Excess Costs of Back Office Compared to the Average for General Administration				\$ 563,126	

* Source: Ed Data Partnership, 22-23 Data

** Includes fiscal , HR, attendance reporting, purchasing, warehousing and district office clerical staff

**Agreed-Upon Procedures over St. Hope Public Schools,
on behalf of Sacramento City Unified School District**

Agreed Upon Procedures (AUP) Results, Cont'd

AUP #4 Results, Cont'd:

Overall Back-Office Services Fee Conclusion: Based on the What-If analysis, the range of costs private sector back-office providers charge and the comparison of general administrative costs of small similar sized school districts, the back-office services fees charged by SHA appear above market, even up to \$1.1M higher. One reason put forth in a meeting with SHPS Supt. Ruda are the additional "community service" type activities that SHA is providing to the students and parents of SHPS. However, according to SCUSD's records these services were not included in the Local Control and Accountability Plans (LCAP) for either of the SHPS charters, and therefore are not tied to measurable student outcomes.

But overall costs of individual SHA and SHDC salaries, benefits and other expenses seem reasonable when looking at the Form 990 reporting. One conclusion might be that the community development activities of SHA are subsidized by the charter revenue. We would recommend that SHA/SHDC consider using more formula-driven methods to allocate costs between SHPS and SHA/SHDC, and to justify the agreement for service charges. SHPS might save costs by contracting with an outside back-office provider and shopping the market for other services SHA/SHDC provide.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on whether losses have occurred as identified by a forensic loss investigation. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the SCUSD's management and the governing board and should not be used by anyone other than these specified parties unless authorized by those parties.



Christy White Brook, CPA, CFE
President
Christy White, Inc.
San Diego, California



Staff Summary of Investigative Findings

Re: St. Hope Public Schools

May-July 2024

Abbreviations:

CW = Christy White Accountancy Corporation

F3 = Fagen, Friedman & Fulfrost Law

PS7 = Public School 7 (TK-8 Charter under the umbrella of SHPS)

SCHS = Sacramento Charter High School (9-12 Charter under the umbrella of SHPS)

SCUSD = Sacramento City Unified School District = "the District"

SHA = St. Hope Academy

SHDC = St. Hope Development Corporation

SHPS = St. Hope Public Schools

Menu of Suggested Actions

No Action = Expressed allegations were not substantiated by the investigative process or SHPS was found to be compliant with applicable law or charter provision.

Out of Purview = Areas that are allowed within the autonomy of the charter school and under their current petition. Not in the purview of the authorizer to address.

Notice = Raises significant fiscal or governance concerns and will be included in a formal Notice to Cure

Address at Renewal = May be considered as part of the renewal process but does not fall under fiscal or governance concerns

Monitor with Oversight = Can be addressed through the ongoing and regular annual oversight process

Student and Staff Safety

Allegation	Records Requested	Records Received/ Reviewed	Findings	Suggested Action
SHPS is not adequately ensure the safety of students and staff.	<ul style="list-style-type: none"> - School Safety Plans for PS7 and SCHS (23-24) - Evidence of Board Review of Safety Plans - Copy of Procedures for addressing threats on campus - Evidence of Training of Staff 	Requested records were received and reviewed.	<p>Not substantiated.</p> <p>SHPS was found to be in compliance with most requirements for School Safety Plans and staff training</p>	<p><u>No Action</u></p> <p>Staff will monitor all charter school safety plans through regular oversight.</p>

Educational Program / Serving All Students Who Wish to Attend

Allegation	Records Requested	Records Received/ Reviewed	Findings	Suggested Action
SHPS is not adequately investing in instructional materials to successfully implement its proposed education program.	<ul style="list-style-type: none"> - Evidence of curriculum provided to teachers aligned to language in charter - Evidence of textbook or instructional materials for all core subject areas - Documentation of steps taken by school leadership and/or staff to address declines in academic performance 	Requested records were received and reviewed.	<p>Not substantiated within authorizer purview.</p> <p>SHPS was found to be in compliance with the language in their charter and has no record of Williams Act violations.</p>	<p><u>Monitor with Oversight Out of Purview</u></p> <p>SHPS has the autonomy to make their own curriculum decisions so long as those decisions meet Williams Act standards and language in the approved charter.</p>
SHPS is not adequately implementing a program for students with disabilities.	<ul style="list-style-type: none"> - List of staff members assigned to provide Specialized Academic Instruction) SAI to students with disabilities - Random selection of 3 IEPs and service logs for review 	Requested records were received and reviewed.	<p>Substantiated</p> <p>SHPS was found to be out of compliance with regard to Special Education Staffing.</p> <p>Inconclusive</p> <p>Staff was not able to determine whether SHPS is in compliance regarding IEPs based on submitted records.</p>	<p><u>Notice.</u></p> <p>The SPED staffing issue is significant enough to rise to the level of formal Notice provided to SHPS on July 26th, 2024.</p> <p><u>Monitor with Oversight / Address at Renewal</u></p>

Educational Program / Serving All Students Who Wish to Attend continued

Allegation	Records Requested	Records Received/Reviewed	Findings	Suggested Action
SHPS is not taking steps to ensure that disproportionate discipline does not limit equitable access to education programs.	<ul style="list-style-type: none"> - Documentation of steps taken by school leadership and/or staff to address high suspension or chronic absenteeism - Data on total number of suspensions and expulsion and chronic absenteeism for each significant subgroup, including African American, Hispanic/Latino, and students with disabilities 	<p>Requested records were received and reviewed.</p> <p>Staff cross-referenced records with public data.</p> <p>Staff also reviewed language about suspension and chronic absenteeism in charter petition.</p>	<p>Inconclusive</p> <p>SHPS suspension percentages have been consistently 8-15 percentage points higher than the District since 2017. Rates for African American, Students with Disabilities, Hispanic Students, and Socio-economically Disadvantaged students are disproportionately high. However, it is not clear what actions have or are being taken to address this.</p>	<p><u>Monitor with Oversight/Address at Renewal</u></p> <p>It would be reasonable to request that SHPS provided a detailed action plan to address this data.</p>

Teacher Credentialling and Human Resources

Allegation	Records Requested	Records Received/Reviewed	Findings	Suggested Action
SHPS employs a high number of under qualified or not appropriately credentialled teaching staff.	<ul style="list-style-type: none"> - Staff Lists for both PS7/SCHS - Number of staff with clear, out of field, internal, or incomplete credentials - Staff employee handbook and copies of any SHPS involving recruitment, retention, evaluation, and discipline 	<p>Requested records were received and reviewed.</p> <p>Information available in CTC public search, Data Quest was also reviewed</p>	<p>Substantiated</p> <p>SHPS was found to have a high percentage of teachers with "Ineffective" credential status.</p>	<p><u>Notice.</u></p> <p>This issue is significant enough to rise to the level of formal Notice provided to SHPS on July 26th, 2024.</p>
SHPS is engaging in other Human Resource matters that rise to level of district intervention.	<ul style="list-style-type: none"> - Copies of employee complaints - Written report(s) following the completion of any investigations related to allegations of staff throwing parties with alcohol and students present or subsequent retaliation or harassment 	<p>Redacted and non-confidential records were received and reviewed.</p>	<p>Not substantiated within authorizer purview.</p>	<p><u>No Action / Out of Purview</u></p> <p>Employee disputes and complaint procedures are an internal charter school matter unless allegations are of a serious nature that amount to discrimination, safety/welfare issues, etc.</p>

Fiscal / Conflict of Interest / Governance

Area / Question	Records Requested	Records Received/ Reviewed	Findings	Suggested Action
SHPS is not compliant with Governance expectations under the Ralph M. Brown Act.	<ul style="list-style-type: none"> - Agenda and Meeting Minutes from March 7, 2024, Board Meeting - Evidence of Timely and Prominent Posting of Board Meeting Agenda 	The requested records were provided. Additional Board Meeting documents were reviewed on the SHPS website.	Not Substantiated	<u>Monitor with Oversight</u> This is part of the District's annual oversight and will be reviewed on an ongoing basis.
SHPS is not maintaining financial records that meet generally acceptable accounting standards.	See Report from Christy White Accountancy Corporation	Substantiated	Substantiated where this issue is reviewed in depth.	<u>Notice.</u> This issue is significant enough to rise to the level of formal notice. Details were included in Notice provided to SHPS on July 26 th , 2024.
There is a conflict of interest and/or high degree of interrelatedness between SHPS, SHA, and SHDC.	See Report from Christy White Accountancy Corporation	Substantiated	Substantiated where this issue is reviewed in depth.	<u>Notice.</u> This issue is significant enough to rise to the level of formal notice. Details were included in Notice provided to SHPS on July 26 th , 2024.



St. HOPE Public Schools
2315 34th St. Sacramento, CA 95817
916-277-6200

EXHIBIT B

Lisa Marie Ruda
Superintendent

Attachments Available At:
<https://drive.google.com/file/d/1EjUUyrFU10silEDVjYInNI6GG8ELSyAx/view?usp=sharing>

August 26, 2024

Superintendent Lisa Allen
Sacramento Unified School District
5735 47th Avenue
Sacramento, CA 95824

Re: Response to July 26, 2024 Notice to Cure and Corrective Action Plans

Dear Superintendent Allen:

It is with much pride that St. HOPE Public Schools (“SHPS”) submits this response and three accompanying action plans to the Sacramento City Unified School District (“SCUSD” or the “District”) in response to its Notice to Cure dated July 26, 2024. I believe the word “pride” is fitting, because the response reflects the best of who we are at SHPS as an organization: we have taken the concerns expressed by the SCUSD to heart, we have reflected, and as a team, we have worked tirelessly to chart a path forward to build deeper public trust, create greater transparency in our processes, and drive excellence in all aspects of our operations. That is what continuous improvement is all about at SHPS: never being content with the status quo, always striving to do and be our best, so we can continue to help scholars do and be their best.

We completely agree with the sentiment expressed in SCUSD’s notice “that it is the shared interest of both the SCUSD and SHPS to ensure that students are provided opportunities to learn, grow and reach their greatness so that they may graduate with the greatest number of postsecondary choices from the widest array of options.” (p. 10.)

We are proud – and we truly hope SCUSD is proud – of the transitional kindergarten-to-college pathway that SHPS has built with SCUSD over the past 20 years. But we know that we cannot rest on our achievements, as detailed extensively in our charter renewal petitions. We know SHPS is entrusted with public funds and the responsibility of operating public schools, and SHPS must prove it is a responsible and worthy steward in its operations. We know we have been a good steward in using the public funding provided to public schools to achieve above-average results. In addition, we also understand what we see through our own eyes may not be fully understood and appreciated by those looking at SHPS from the outside.

In some respects, the process over the past four months has been redeeming to SHPS, as the original list of concerns (which originated externally from SCUSD) shrunk considerably from an extensive list to just the three core areas requiring a response to the Notice to Cure. In other respects, the process has been frustrating and disappointing. We read the Notice to Cure as identifying “concerns” and lapses in some areas, but do not read it as alleging any actual

violations of any laws or regulations, nor identifying any misuse of public funds. We believe all of SCUSD's concerns could have been discussed and addressed in the course of normal authorizer oversight over the past several years and we hope our partnership going forward will include any issues being addressed as they arise.

Unfortunately, the process, and the loose use of the term "violation" as interchangeable with "concerns" and "questions" has led to deep public misunderstanding and has created a false impression that serious wrongdoing had been established when it has not. This is perhaps best demonstrated by irresponsible press coverage that has reported on the Notice to Cure as though it established "violations" of the law or misuse of funds, which it did not. And so, in our responses, we must correct the record and provide missing context and facts to make up for damage that has been done – and we have done just that. But, we also own the reality that perception matters, appearance matters, that we must look inward, and we must set SHPS on a course of action that paves the way to secure the trust of SCUSD staff, each SCUSD Board Member, our employees, our families, and the public at large.

Behind this cover letter, we have enclosed three corrective action plans corresponding to the three areas of concern in the Notice to Cure, as well as underlying background and context regarding SHPS' operations as relevant to our response. We summarize the actions detailed in the individual plans below:

Summary of SHPS' Action Plans by Area of Concern

Action Plan	Area of Concern	Summary of Action Plan
#1	<p>Concerns Related to St. HOPE Academy ("SHA") as a back-office service provider to SHPS</p> <p>See pp. SHPS_0008-SHPS_0315</p>	<ul style="list-style-type: none"> For each back-office service area performed by SHA, SHPS will launch a public request for proposal (RFP) process in the 2024-25 school year to select vendors for the 2025-26 school year. Vendor selection will be based on objective scoring measures to be developed in a public process. SHPS plans to retain CliftonLarsonAllen (CLA), SHPS' current external auditor, or another firm if they are unavailable, to review the matters raised by Christy White and determine if the conditions exist as of the 2024-25 school year and whether a corrective action plan has been implemented. If the conditions exist and sufficient progress has not been made to remedy the conditions, SHA will be ineligible to be a vendor for SHPS for these services for 2025-26. SHPS will require SHA to submit detailed monthly invoices which reflect the hours worked by SHA staff to SHPS for back-office services in 2024-2025. SHA will immediately retain additional staff to ensure that financial reporting accounting is GAAP-compliant and is aligned with industry norms

		<p>and SHA staff receive sufficient training. SHA will also retain a third-party school finance expert to support its back-office services team. SHA's current CFO has disengaged from serving SHPS and/or managing or supervising anyone at SHA who provides back-office services to SHPS.</p> <ul style="list-style-type: none"> • SHPS and SHA will develop performance standards and deadlines to more effectively monitor SHA performance. The performance standards and deadlines will include the following: financial reconciliations, grant reporting, budget to actual reporting and audit support. • SHPS offers to convene quarterly meetings with SCUSD to review progress with respect to this corrective action plan.
#2	<p>Credentialing Concerns</p> <p>See pp. SHPS_0316 to SHPS_0780</p>	<ul style="list-style-type: none"> • SHPS has and will continue to verify teacher credentials as part of the hiring process. • SHPS will continue to make efforts to minimize the use of emergency credentials. • SHPS has and will continue to implement and monitor credential agreements to ensure staff are working towards appropriate credentials. • SHPS confirms and submits supporting documents to verify that certificated assignments in the 2024-25 school year are held by an employee authorized, or who will be authorized upon approval of the submissions pending with the California Commission on Teacher Credentialing ("CTC") for the assignment under Education Code Section 47605(l). • SHPS offers to meet quarterly with SCUSD to review credentialing status for SHPS teachers to ensure SCUSD has current and accurate data that may not be available to SCUSD. • SHPS will continue to work with its teachers and SCTA to identify ways to further support teachers who need to secure their preliminary or clear credentials.
#3	<p>Conflict of Interest Concerns</p> <p>See pp. SHPS_0781 to SHPS_1071</p>	<ul style="list-style-type: none"> • Ms. Jennings will resign from SHPS Board effective September 30, 2024 and after SCUSD approves SHPS' requested charter renewals, notwithstanding that Government Code Section 1091 authorizes her continued service. The next regular SHPS Board of Directors meeting is September 12, 2024 at which

		<p>time, the Board can appoint a new Chairperson and plan appropriately for the transition.</p> <ul style="list-style-type: none"> • SHPS will amend its bylaws to preclude any officer, director, or employee of a vendor or intended vendor from serving on SHPS' Board. • SHPS will ensure that any legal matters involving SHA, SHDC or the St. HOPE Endowment are addressed by outside legal counsel and not by Kevin Heistand. SHPS' Superintendent shall be responsible for directing legal services accordingly. • SHPS will issue public RFP for back-office services and impose contractual terms that ensure increased vendor accountability. Please see SHPS' response in Action Plan #1 which provides a detailed outline of the forthcoming RFP process. • SHPS has updated its 2024-25 LCAPs to reflect how the funds to SHA tie to student outcomes.
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In the same spirit of self-reflection, and because context matters, SHPS believes it is important to review the actions that led SCUSD to launch this unprecedented investigation on the eve of charter renewal. As we have shared, SHPS notified SCUSD well over a year ago that it would submit its charter petitions in June 2025 so as to preserve our right to appeal in the event SCUSD denies our petition request. Immediately after we were notified of SCUSD's investigation, SHPS submitted a public records request to SCUSD asking for production of all "concerns" that SCUSD had received or that SCUSD would be reviewing as part of this investigation as well as any other concerns brought to anyone at SCUSD - the Superintendent, charter school office and/or SCUSD Board members from July 1, 2022 to present.¹ L. Ruda letter to L. Allen dated May 13, 2024.

¹ "Your correspondence notes that these concerns have been raised in the oversight process, CTA correspondence, and correspondence of parents and teachers. For SHPS to most effectively and thoroughly respond to these concerns, as well as to prepare any necessary documentation, please consider this communication a request for the production of all of those written concerns received by District Board members and/or District staff and any responses the District Board members and/or District staff have made to those concerns (i.e., letters, emails, text messages, etc.). Although your letter does not state a date upon which these concerns had first been raised, for purposes of this request for public records, we would ask that all concerns that form the basis of the District's May 10th letter, including those provided by CTA staff (or SCTA), as well as those provided by any other member of the public, from July 1, 2022 to present be provided to SHPS forthwith. In addition, please provide all records of the District's annual oversight process from the 2022-23 and 2023-24 school years." SCUSD's PRA acknowledgement of SHPS Records Request dated May 17, 2024.

In response to SHPS's request, SCUSD provided the following chart of 5 "complaints" it had received over the past two years.

#	Date	Complainant	Concern
1	9/20/23	Info removed	Complainant emailed the Superintendent's office with a concern about concerning social media posts by Sac High students
2	9/27/23	Name removed	Parent was served a withdrawal of consent and had questions about the duration of that, how long it would be pertinent, and if law enforcement was involved in the process
3	10/25/23	Brittoni Ward, Cydney Hampton and John Borsos	Complaint was brought to the district by John Borsos of SCTA as a representative of the St. Hope teacher. The concerns were that St. Hope staff had overheard concerns of other staff members throwing parties, with alcohol, where students were present. The St. Hope teacher lodged the complaint with the St. Hope administration
4	9/19/23	Name removed	Parent called the superintendent's office in an attempt to reach the superintendent of St. Hope.
5	4/17/24	Name removed	Parent left a message with the superintendent's office on 4/16 Parent was concerned about several issues regarding 10th grade student D.M. at Sac High. Concerns with the teacher were addressed in a meeting with the teacher. Other concerns about discipline practice, inability to access the principal, non-permanent teachers

SCUSD identified only five "complaints" it received regarding SHPS. Of those five complaints, one complaint was from a member of the public who was upset about a social media post *possibly* made by a teenage Sac High student (#1), another "complaint" was from an adult who SHPS banned from campus as a result of a serious physical altercation after 8th grade promotion with another adult (neither a staff member or affiliated with SHPS) (#2), one complaint was resolved (#5) as stated in the notes, and another was from the Sacramento City Teachers Association (SCTA) representing a former SHPS staff member who was "at war" with SHPS (#3). In fact, SHPS notified SCUSD that they had commenced a third-party investigation regarding concerns from the former staff member when they were also brought to SHPS. Office of Innovative Schools Complaint Log from June 2023 to May 15, 2024.

Annually, SHPS pays nearly \$110,000 to SCUSD for "charter oversight" of Sac High and PS7. SCUSD's charter or innovative schools office has grown to at least three full-time staff members plus an external audit firm as well as legal counsel. We, particularly I, have been incredibly transparent and responsive to SCUSD's charter school office. SCUSD's annual oversight report for both PS7 and Sac High state that SHPS meets the standard when SCUSD, as the authorizer, requests additional information. SCUSD's PS7 Annual Oversight Report, p. 17-18; SCUSD's Sac High Annual Oversight Report, p. 18-19. To now see public records from the oversight office which question our cooperation and work is both disappointing and contrary to the interactions we have had for two years since I joined SHPS. Amanda Goldman email to Christy

White dated June 3, 2024 (“Sadly, I am not confident that [SHPS] will be responsive.”).² The above listed “complaints” are issues that should be addressed and resolved between a charter school and authorizer as part of the normal day-to-day oversight.

Needless to say, I was disappointed to learn that SCTA was listed as the source of the three concerns that were ultimately included in your Notice of Cure to SHPS (credentialing, conflict of interest with Ms. Jennings’ role and back-office services provided by SHA). Talking Points Requested by Lisa Allen, Tuesday 4/30, for conversation with Dave Gordon. The written concerns SCTA presented to SCUSD included the “PERB” time-stamp, meaning SCTA had already availed itself to the legal body charged with adjudicating employer-union concerns by the time it reached out to you.

As our charter authorizer, we believe SCUSD should have raised these concerns long before our charter petitions were filed. SCUSD, particularly the charter school office, was fully aware Ms. Jennings was the SHPS Board Chair and SHA CEO/Executive Director from countless interactions regarding the Sacramento High School and PS7 Elementary campuses, or should have been aware from the regular, monthly submissions SHPS is required to provide to that office.

As we move forward, I want to reiterate that our objective in offering this response is to **fully** address SCUSD’s concerns through thoughtful explanations and meaningful, significant, and concrete actions. We are seeking to meet SCUSD all of the way – not halfway or through half measures – with the hope that SCUSD will affirm what is operationally sensible and reasonable from SHPS’ perspective.

We believe that with these responses, there can be no justification for denial of SHPS’ charter renewal petitions on the basis that our charter schools are “demonstrably unlikely to successfully implement the program set forth in the petition due to **substantial** fiscal or governance factors” within the meaning of Education Code Section 47607(e). The **concerns** that SCUSD has raised simply do not rise to “**substantial** fiscal or governance factors” and certainly do not indicate that SHPS is “**demonstrably unlikely** to successfully implement the program.” Notwithstanding the lack of evidence or support of “**substantial** fiscal or governance factors from the Christy White report or otherwise, we believe our corrective action plan in response to SCUSD’s concerns is robust, and there are no circumstances or evidence that would allow a finding that “[t]he corrective action proposed by the charter school has been unsuccessful” or that “[t]he violations are sufficiently severe and pervasive as to render a corrective action plan unviable” – the findings that are legally required to deny SHPS’ charter petition if “**substantial** fiscal or governance factors” were present. Amanda Goldman email to Christy White dated May 13, 2024.

If SCUSD has **any** questions or concerns, we ask that SCUSD let us know before SCUSD finalizes its staff findings on SHPS’ renewal petitions. If there is something that SCUSD is expecting and needs from SHPS in order for SHPS to receive SCUSD’s vote of confidence, we

² We were also very surprised to see in response to SHPS’ public records request that correspondence between SCUSD and Christy White regarding Christy White’s engagement was withheld on the basis of attorney-client privileged. As a vendor retained to prepare an independent investigation, we cannot conceive of how any conversations with a non-agent could have been protected by the attorney-client privilege.

want to know what that is now so that we can do everything to earn that vote. We trust, based on SHPS and SCUSD's more than two decades of partnership, this is not an exercise in which SHPS must "guess correctly" as to what will be satisfactory to SCUSD. We view this response as the next step towards ensuring a successful charter renewal term for our two charter schools. We are excited for the future in partnership with SCUSD, for all of the good that we believe will come from this process and the actions SHPS is pursuing in the interest of continuous improvement.

Thank you for your careful consideration of our submission. We stand ready to work with SCUSD staff and the SCUSD Board and ensure that every question is answered and every concern is allayed. I am fully available over the coming days and weeks to meet with any SCUSD staff member or Board member.

Sincerely,

Lisa Marie Ruda

Lisa Ruda

Cc: Amanda Goldman, Director, Innovative Schools
Members of the SCUSD Board of Education
Cassandra H.B. Jennings, Chairperson SHPS Board of Directors



Action Plan #1

Addressing Concerns Regarding Alleged Fiscal/Governance Violations

SHPS Action Plan #1
Addressing Concerns Regarding the
Alleged Fiscal/Governance Violations

In this document, SHPS describes the specific plans it intends to implement in response to the concerns SCUSD has raised regarding SHPS contracting with SHA to provide back office services¹. SCUSD has asked SHPS to “thoughtfully and carefully consider whether SHA possesses the requisite background knowledge and expertise in education finance to carry out [back-office] functions.” L. Allen letter to L. Ruda dated July 26, 2024, p. 4. SHPS has carefully considered this question and will take significant, meaningful operational changes to increase SCUSD and the public’s confidence in SHPS’ back-office services, including its financial reporting, as described below. More specifically, SHPS commits to the following actions, which are further detailed below:

1. For each back-office service area performed by SHA, SHPS will launch a public request for proposal (RFP) process in the 2024-25 school year to select vendors for the 2025-26 school year. Vendor selection will be based on objective scoring measures to be developed in a public process.
2. SHPS plans to retain CliftonLarsonAllen (CLA), SHPS’ current external auditor, or another firm if they are unavailable, to review the matters raised by Christy White and determine if the conditions exist as of the 2024-25 school year and whether a corrective action plan has been implemented. If the conditions exist and sufficient progress has not been made to remedy the conditions, SHA will be ineligible to be a vendor for SHPS for these services for 2025-26.
3. SHPS will require SHA to submit detailed monthly invoices which reflect the hours worked by SHA staff to SHPS for back-office services in 2024-2025.
4. SHA will immediately retain additional staff to ensure that financial reporting accounting is GAAP-compliant and is aligned with industry norms and SHA staff receive sufficient training. SHA will also retain a third-party school finance expert to support its back-office services team. SHA’s current CFO has disengaged from serving SHPS and/or managing or supervising anyone at SHA who provides back-office services to SHPS.
5. SHPS and SHA will develop performance standards and deadlines to more effectively monitor SHA performance. The performance standards and deadlines will include the

¹ Back-office services include budgeting, accounts payable, payroll, audit support and grant reporting.

following: financial reconciliations, grant reporting, budget to actual reporting and audit support.

6. SHPS offers to convene quarterly meetings with SCUSD to review progress with respect to this corrective action plan.

Background and Context

SHPS' Work With SHA

SHPS has contracted with SHA to provide back-office services since 2018. Annually, the Board of Directors ("BOD") of SHPS considers and approves the back-office services contract at a public board meeting. The most recent contract for 2024-25 was approved on June 27, 2024. During the public meeting, and before the BOD moved to approve the contract, the SHPS Superintendent made a presentation which delineated the scope of services, the fees proposed and comparable fees from other back-office service providers, which SHPS had contacted prior to proposing the back-office service contract with SHA for 2024-25. A copy of that public presentation as well as the meeting agenda, minutes and memorandum to the BOD in advance of the meeting is attached. These documents were also provided to Christy White during a meeting with SHPS on July 11, 2024. L. Rosenberg email to Christy White dated 07 11 2024; Meeting Minutes and Agenda (presentation linked in agenda) from Regular BOD Meeting held on June 27, 2024; SHPS BOD Memorandum Regarding SHA & SHDC.

As part of the 2024-25 contract review, SHPS contacted outside vendors who provide back-office services to charter schools. The Superintendent discussed the same with the SCUSD Director of Innovation who proposed some vendors for SHPS to contact to identify market costs. Costs for back-office services for SHA were then aligned with those charged by other vendors to ensure the fee SHPS paid to SHA market rates was reasonable. The fee ultimately proposed for SHPS for 2024-25 was at least \$30,000 less than the next lowest priced vendor contacted by SHPS. See SHPS BOD Presentation dated June 27, 2024 linked within Meeting Minutes from June 27, 2024 SHPS BOD Meeting.

No third-party vendor contacted by SHPS as part of this pre-contract review provided comparable services (non-back-office services such as summer programming or even facilities and information technology support) like SHPS receives from SHA or St. HOPE Development Company ("SHDC"). In addition, no vendor felt a transition of the traditional back-office financial services prior to January 1, 2025, was prudent if SHPS was interested in a change in vendor. Vendors stated a transition prior to that time, while possible if absolutely necessary, would be difficult, rushed, and not ideal. All vendors expressed a strong preference for working with SHPS to build the annual budget for the year in which they would assume back-office functions. In other words, SHPS' 2024-25 budget, which went into effect on July 1, 2024, was already being developed at

the time bids were being solicited. Vendors preferred to work with SHPS in the spring of 2025 to develop the budget and then provide back-office services when that budget was in place on July 1, 2025 for the 2025-26 school year.

Changes to 2024-25 Scope of SHPS' Work with SHA

SHPS also changed the scope of work included in the SHA 2024-25 contract to increase student outcomes and improve school culture by filling in gaps in programming, such as the areas of parent engagement, student community service and internship opportunities, that SHPS cannot fill with its existing staff or expertise. St. HOPE Public Schools is rooted in our five pillars, one of which is the “power to lead” and, as a result, we strongly believe community service helps our scholars develop a strong sense of civic responsibility and establish the foundation for a lifetime of meaningful community involvement. Over the course of their time at Sacramento Charter High School (“Sac High”), scholars are expected to complete 110 hours of community service. Each year, students must complete a set number of hours. By their junior and senior years, Sac High scholars must annually complete 40 hours of community service.

Furthermore, the current charter petition for Sac High includes a graduate profile on pgs. 18-19. One element of this graduate profile is that students will “have participated in an internship with an external organization.”

The new scope of work for 2024-25 charged SHA with supporting SHPS by providing the following services:

- Securing internship opportunities (paid, unpaid, academic credit or non-credit) or chances to explore careers.
- Identifying onsite and off-site opportunities for Sac High students to fulfill their community service requirements as mandated through their advisory courses.

2024-25 Consultant Agreement with SHA, p. 6.

The Secretary of Education has unequivocally stated that Internships and work-based learning has “educational value” and that partnering with community based organizations is appropriate. (Guidance from U.S. Secretary of Education dated November 14, 2022, p. 6.) As noted by the Secretary,

“[T]he pandemic reduced the availability of work-based learning. These impacts have been more pronounced in certain industries, particularly those that have traditionally engaged a youth workforce, in addition to industries that support earn-and-learn educational models like Registered Apprenticeship. *Work-based learning is a proven strategy that reinforces academic instruction by giving students opportunities to apply knowledge and skills in real-world situations.* Work-based learning also helps young people to generate income,

establish future earning potential, and connect with professionals in the labor market. The US Department of Education has encouraged school districts to support new skill-building experiences like internships, cooperative education, pre-apprenticeships, and registered apprenticeship programs that are integrated within school-day instruction and other extended learning models that occur after school or over the summer months.”

Consistent with the Secretary’s direction, SHPS contracted with SHA to expose our scholars to various hands-on learning experiences outside the classroom. The Secretary encouraged school districts to “liaise with intermediary organizations that can help to connect communities, schools, employers, and students. Intermediaries could include, for example, entities that organize and convene employers, such as chambers of commerce; nonprofit organizations with established relationships with employers, such as organizations...” (Guidance from U.S. Secretary of Education dated November 14, 2022, p. 6.)

Chairperson Jennings’ Recusal from the SHA Contract Discussion and Vote

Please note that Cassandra Jennings, the SHA and SHDC CEO/Executive Director and the Chairperson of the SHPS Board of Directors (BOD), recused herself from the SHPS BOD discussion, presentation and vote relative to the 2024-25 contracts with SHA and SHDC, as she had done since Ms. Jennings was appointed SHPS Board Chairperson in July 2022. As noted in the minutes:

- At 5:35 p.m., Ms. Jennings recused herself from the discussion and vote of the agenda items related to St. HOPE Academy (SHA) and St. HOPE Development Corporation (SHDC) due to her position as Executive Director for SHA and SHDC. Ms. Ruda proceeded to delineate how the proposed agreements were created and the goals SHPS with respect to both agreements. Ms. Ruda’s presentation included slides 9 through 16 of the linked presentation which was made during and available during the public meeting. Ms. Ruda highlighted the following: (1) SHPS continued reduced the SHA contract cost by \$211,104 in addition to the \$200,000 in savings realized with the 2023-24 contract, (2) The scope of facilities work performed by SHDC increases due to changes made by SCUSD which transfers additional responsibilities to SHPS effective July 1, 2024, and (3) the new contracts allow SHPS to benefit from the expertise of SHA particularly in the area of parent and community engagement where SHPS is deeply committed to improving and expanding relationships with SHPS scholar, their families and our larger Oak Park community. Ms. Ruda also underscored that SHA would be supporting SHPS by organizing SHPS’s Hispanic Heritage Month in September 2024 (like the programming created by SHA for Black History Month) and they would be providing opportunities for scholar internships and community service. Finally, Ms. Ruda advised that the scope of work and fee was set by SHPS and that Ms. Jennings neither advised or engaged with her relative to the scope of work and fee.

Meeting Minutes from Regular BOD Meeting held on June 27, 2024. After the BOD approval, I presented the contracts to Ms. Jennings for her review and signature in her capacity as the CEO/Executive Director of SHA and SHDC. Ms. Jennings executed the agreements as approved by the SHPS BOD without proposing or making any changes.

Commitment to Improve Back-Office Services

SHPS understands and acknowledges that SHPS' most recent audit identified a repeat finding related to revenue recognition and misclassification of expenditures, as well as a lapse in timely reconciliation of bank accounts in SHA's provision of back-office services to SHPS. SHPS is further aware, and disappointed, that the most recent audit was completed after the December 15th deadline.

SCUSD was also aware long before the current investigation was launched that the audit included this finding. As required by law, SHPS' annual independent audit is submitted annually to SCUSD after it is accepted by the SHPS BOD at a public meeting. Please see agendas and minutes from the March 7, 2024 SHPS BOD meeting (2022-23 audit approved) and the March 31, 2023 SHPS BOD meeting agenda and minutes (2021-22 audit approved).

In addition, SHPS sought, and SCUSD approved, SHPS's extension to submit its 2022-23 audit. See November 27, 2023 letter from Sandra Moorman (former CFO of SHA) to Janea Marking (SCUSD). The reasons for the requested extension, as documented by SHPS's auditors in a letter that was included with Ms. Moorman's request to Ms. Marking, were as follows:

We are writing this letter to request an extension of the School's June 30, 2023 audited financial report submission to March 31, 2024. The primary reason(s) are related to:

- *The shortage of client personnel, primarily responsible for the audit.*
- *New state and federal programs have significantly delayed the client in closing the accounting records for the year under audit.*

Letter from Lili Huang, CliftonLarsenAllen LLP, to The Authorizers of St. HOPE Public Schools dated November 6, 2023. SCUSD approved the extension request on December 6, 2023 and the SHPS BOD authorized Ms. Moorman to request the extension from SCUSD at a public meeting, which was based on the causes as attested to by SHPS' auditors in their letter dated November 6, 2023, which was submitted to SCUSD when the extension request was submitted.

Going Forward – SHPS' Action Plan

1. Implement a RFP Process for Back-Office Services

SHPS believes it is important to institute additional layers of fiscal accountability and secure immediate assurance in the current 2024-25 school year, and going forward, that SHPS' accounting processes, and those it contracts with to execute such processes, are compliant with all applicable laws, regulations, and standards. SHPS has developed the following action plan as a cure to SCUSD's concerns outlined in *Section II (A) Non-GAAP Accounting Practices of SCUSD's Notice to Cure*.

In order to create further arms-length distance between SHA and SHPS, increase transparency and trust, obtain the highest quality services at the best price, and create healthy competition, SHPS will launch a competitive bidding request for proposal process ("RFP") for back-office services within thirty (30) days of charter renewal. Back-office services would include budgeting, financial reporting, payroll, accounts payable, audit management and grant reporting.

Please note SHPS' decision to launch a competitive bid process for back-office services is *in addition* to the decision of Cassandra Jennings to resign her position as Chairperson and member of the Board of Directors of SHPS, which is discussed fully in SHPS' corrective action plan in response to Section II (C) *Potential Conflict(s) of Interest Under Government Code Section 1090 and Political Reform Act of 1974 (Government Code sections 81000 et seq.)*.

SHPS commits that the competitive bid process will include the following:

1. Service areas would be described in detail so as to allow each bidder to fully understand the operational requirements and bid accordingly.
2. Bidders may bid to provide one or multiple service areas, but in all cases, must provide individual pricing for each service area as part of any proposal.
3. The RFP will utilize standardized requirements for contract terms (e.g., insurance, indemnities, etc.) and standardized bid requirements (e.g., application form, narrative questions, request for resumes of key employees, compliance documents, right to audit).
4. SHPS will develop a scoring rubric that is designed to award the most points to any bid which represents the most relevant experience, expertise, capacity, reputation, at the best possible price. Relevant experience includes, but is not limited to, school or education finance, experience. Positive experience with other, non-SHPS charter schools or in the area of school finance will be weighed higher.

5. The RFP documents will be reviewed and approved by a subcommittee of three members of SHPS' board ("RFP Committee"). Consistent with changes to the SHPS BOD bylaws, which are discussed later in SHPS' Action Plan #3, "Addressing Concerns Regarding the Appearance of Conflict of Interests," the subcommittee will not include any SHA employees or employees of any other bidders.
6. The RFP committee will comply with the Brown Act. The draft RFP documents will be posted prominently on SHPS' website prior to a meeting of the RFP Committee at which time a public hearing will be held on the proposed RFP documents. SHPS will also share the posting with relevant non-profits in an effort to reach potential bidders.
7. Bids will be subject to a deadline of at least 45 days from posting, and bids, including proposed price, will be posted to SHPS' website upon the conclusion of the open bidding process.
8. SHPS will obtain a third-party pricing review/reasonableness review of all bids by an individual or firm with appropriate experience. The individual/firm must not be an existing vendor of SHA, SHDC or any other bidder. In addition, the individual/firm must not have any familial connection or business relationship to an officer, employee, or board member of SHA, SHDC or any other bidder.
9. The RFP Committee will score each of the bids received and make a recommendation to the SHPS' Board. Any recommendation from the RFP Committee to accept a particular bid or bid(s) that are not the highest scoring bid(s) or that are equal in points to other bid(s) must be accompanied by a written justification.

Once the preferred vendor is identified via the RFP process, SHPS and the vendor will negotiate and execute a contract for services. SHPS commits the proposed contract will include provisions requiring the vendor to submit invoices that include time-hour accounting. SHPS further commits that, in line with Christy White's recommendations, SHPS will propose the contract has a "right to audit" or review records clause.

As discussed in detail below, SHA may submit a bid for back-office services only if they have remedied or made conditions exist and sufficient progress to remedy the outstanding material weakness.

2. Engage Clifton Larson and Allen LLP (or another accounting firm) to Review the Allegations in the Christy White Report and SHA's Performance in the Current School Year

SHPS has initially engaged its auditors Clifton Larson and Allen LLP (“Clifton Larson”) to review the allegations made in the Christy White report. Clifton Larson is currently completing the SHPS audit for the period of July 1, 2023 through June 30, 2024. Clifton Larson has advised SHPS that it will complete this new engagement, at an additional cost to SHPS, on or before December 15, 2024, the date by which the FY2024 audit must be finalized. Due to its own internal controls and procedures, Clifton Larson was unable to complete the new engagement before SHPS submitted this corrective action plan.

SHPS is working to finalize an engagement letter for this additional work with Clifton Larson. In the event Clifton Larson is unable to complete this work or that this additional work will delay completion of the FY24 audit, which is due December 15, 2024, SHPS will engage another accounting firm to review the matters raised by Christy White and determine if the conditions exist as of the 2024-25 school year and whether a corrective action plan has been implemented. If the conditions exist and sufficient progress has not been made to remedy the conditions, SHA will be ineligible to be a vendor for SHPS for these services for 2025-26.

Immediately upon receiving the Christy White report, SHPS notified Clifton Larson of the report and provided them a copy of Superintendent Allen’s July 26, 2024 letter as well as the Christy White report. Beyond reviewing the allegations made in the Christy White report, SHPS has proposed the scope of Clifton Larson’s special engagement will include the following:

- Ensuring SHA has implemented its corrective action plan to address and resolve the material weakness identified in the FY2023 audit,
- Reviewing SHA’s current compliance with GAAP with respect to SHPS accounting records and processes; and
- Issuing a report documenting its findings.

In the event Clifton Larson finds that the conditions raised by Christy White continue to exist as of the current school year and sufficient progress has not been made to remedy the material weakness and improve the accuracy and timeliness of financial reconciliations after the last fiscal audit, SHA shall not be eligible for the award of the back-office services contract.

As noted, if Clifton Larson cannot complete the additional report SHPS will engage another accounting firm to execute the above scope of work.

3. Require SHA to Submit Detailed Monthly Invoices for 2024-2025

As SCUSD is aware, the Board of Directors of SHPS approved the current back-office service contract with SHA for 2024-2025 at a public board meeting on June 27, 2024. See Agenda and Minutes for June 27, 2024 SHPS BOD Meeting. Notwithstanding the fact that an agreement is in place until June 30, 2025, SHPS and SHA have taken steps to increase confidence in SHA's roles during the current contracting period by amending the existing contract to require SHA to submit to SHPS detailed invoices, identifying the services provided during the prior month, expenses incurred specific to serving SHPS, and the FTE allocation of SHA staff to supporting SHPS in line with Christy White's recommendations. L. Allen to L. Ruda dated July 26, 2024, p. 31.

On a quarterly basis, SHPS and SHA will reconcile the prior quarter's invoices to determine if the invoiced amounts match the monthly fees charged for that quarter. If the fees paid exceed the services provided, a reduction or adjustment in the next quarterly payment will be made pursuant to a refund procedure that SHPS and SHA will create.

4. Retain New, Experienced SHA Staff And Train Existing SHA Staff To Ensure Financial Reporting Accounting Is GAAP-Compliant And Is Aligned With Industry Norms.

SHPS concurs that additional background, knowledge and experience in school or education finance, and GAAP standards in particular, will be a prerequisite for SHA to provide high-quality back-office. SHPS and SHA acknowledge such experience and expertise increase public confidence in how public funds are managed, reported and spent.

To ensure the concerns raised by SCUSD are fully addressed, SHPS has requested, and SHA has agreed to add staff with the requisite nonprofit accounting and school/education finance experience. As of August 26, 2024, Rachel Menaugh, CPA serves as chief financial officer ("CFO"), directs and manages the SHA back-office team and provide the following services:

- Ensure financial reporting is GAAP compliant and at or above industry norms
- Implement time-hour accounting
- Implement and monitor internal controls
- Support the timely completion of the annual audit
- Complete monthly reconciliations and year-end close

Ms. Menaugh has nearly a decade of experience with respect to non-profit organizations and public school audits while working at established accounting firms. SHA will also retain a third-party school or education finance expert to oversee SHPS' back-office. As of the date of this response, SHA is in the process of identifying candidates to serve in this role.

In addition, all existing SHA staff who provide back-office services will be required to complete training by January 2025. Finally, SHA's CFO noted in SCUSD's Notice of Concern is no longer serving SHPS and/or managing or supervising anyone at SHA who provides back-office services to SHPS.

5. SHPS And SHA Will Develop Performance Standards And Deadlines To More Effectively Monitor And Assess SHA's Performance Of Back-Office Services.

SHPS and SHA will develop a comprehensive calendar and performance standards by which to monitor SHA's performance and the delivery of back-office services. Ms. Menaugh will be responsible for working with SHPS to set performance standards and deadlines in the following areas to ensure services provided by SHA are at or above the level provided by other back-office service providers or industry norms: (1) monthly financial reconciliations, (2) year-end close, (3) budget to actual reporting, and (4) audit support and management.

6. SHPS' Offer to Convene Quarterly Meetings with SCUSD to Review Financial Reporting

SHPS proposes to convene quarterly meetings with SCUSD to continue to monitor the above actions. Currently, SHPS provides financial reports to SCUSD every year as required by law. These reports are delivered approximately quarterly, and in some cases more frequently, according to the list below:

1. By July 1, a preliminary budget for the current fiscal year and an annual update.
2. By September 15, a final unaudited report for the full prior year.
3. By December 15, an interim financial report for the current fiscal year reflecting changes through October 31. Additionally, on December 15th, or by the required deadline, a copy of the Charter School's annual, independent financial audit report.
4. By March 15, a second interim financial report for the current fiscal year reflecting changes through January 31.

SHPS' regular submissions are memorialized and accepted by SCUSD. Confirmation of Document Tracking Services ("DTS") Submissions to SCUSD. Documents are submitted through SCUSD's online portal, DTS, pursuant to deadlines set by SCUSD.

In addition to providing SCUSD with the above, required reports, SHPS proposes to convene quarterly meetings with SCUSD to discuss and review spending and financial reporting at the same cadence at which the above reports are provided. The purpose of the meetings would be to review

progress with respect to this corrective action plan, discuss financial submissions (for instance, the First Interim Budget) to SCUSD and the California Department of Education, as well as progress updates on the above mentioned action items

Claims Included in the Christy White Report

While SHPS is committed to working towards solutions with SCUSD, SHPS respectfully must voice its disagreement with many of the conclusions and statements made in the Christy White report. Christy White Letter to SCUSD dated July 17, 2024 and attached to Superintendent Allen's July 26th letter to L. Ruda. The Christy White report has been inappropriately described as an "audit." Moreover, significant portions of the Christy White report are based on incorrect, incomplete or ignored information making the work of very limited value. The Christy White report further offers much speculation, damning criticism and general opinions (without citation to authoritative sources), but no indication of any wrongdoing or any indication that SHPS expenditures are not prudent or not in the interests of students. Apart from one 45-minute meeting that was requested by SHPS, Christy White has not talked with any representatives from SHPS, SHA, SHDC and/or their respective auditors, nor has it visited any SHPS school before drawing conclusions. The Christy White report is far from the independent, objective review that SCUSD promised. SCUSD has acknowledged that "SHPS has received a clean audit report." A. Goldman email to C. White dated May 14, 2024. By presenting the Christy White report as an audit and the above weaknesses, the Christy White report unfairly maligns the credibility and public confidence in SHPS and SHA,² and SHPS respectfully objects to, and challenges it.

1. The Christy White Report is Not an Audit

Like all California charter schools and local education agencies, SHPS is audited annually in accordance with auditing standards generally accepted in the United States of America, the standards set forth in Government Auditing Standards issued by the Comptroller General of the United States, and the provisions of California Code of Regulations (CCR), Title 5, Education, Section 19810, et seq.

SCUSD has acknowledged that "SHPS has received a clean audit report." A. Goldman email to C. White dated May 14, 2024. Generally Accepted Accounting Principles ("GAAP") is a set of accounting rules created to govern financial reporting for corporations in the United States. GAAP is also utilized by government entities, as well as all 50 states, and many local entities, such as counties, cities, towns, and school districts, must adhere to these principles. GAAP represents objectives and guidelines for financial statements and reporting calculations. There are three major

² The conflict of interest concern with respect to the roles of Cassandra Jennings and Kevin Hiestand are addressed in Section #3 of SHPS' Response to SCUSD's notice to cure,

sets of rules covered in GAAP: basic accounting principles and guidelines, detailed standards of the Financial Accounting Standards Board (“FASB”), and generally accepted industry practices. This framework served as the basis for the material weaknesses identified in the SHPS audit as revenue recognition and misclassification of expenditures were noted as well as a lapse in timely reconciliation of bank accounts. However, revenue recognition and misclassification of expenditures were immediately corrected by SHA finance staff. In fact, the auditor recommended just one journal entry adjustment and SHPS concurred. No significant or unusual transactions were identified by the auditor, they encountered no difficulties in dealing with management in performing or completing their audit. There were no significant deficiencies, and it was also noted by the auditor that there were no questioned costs. SHPS Audit for Period Ending June 30, 2023, p. 39-40.

As noted above, SHPS contracts with CliftonLarsenAllen LLP to complete the annual audit, which generally takes at least six (6) months to complete. As noted earlier, the SHPS annual audit for each of the past two years has taken eight to nine months as evidenced by SHPS’ requests to submit the audit by March 31st as opposed to the statutory deadline of December 15th.

The Christy White report was completed in far less time than a traditional audit simply because it did not include any of the rigor or testing that accompanies the annual audit.

The agreed upon procedures executed by SCUSD and Christy White, and the memorialized conversations between them, explicitly state the report is not an audit:

We agree to perform agreed-upon procedures to assist the SCUSD in reviewing the administrative structure and reasonableness of administrative costs of SHA, SHDC, that are charged to SPHS [sic].

....

We will not be conducting an audit . . .

Accordingly, using this report for anything other than the original intent or the agreed-upon procedures could mislead the readers.

The above professional services will be performed based on data and information you (SCUSD) provide to us. We will not verify or audit this information... Our engagement is not designed to...identify reportable conditions, that is, significant deficiencies...or the operation of control.

We agree to perform the engagement, the procedures of which are described above for \$25,000. The engagement is anticipated to be conducted 100% remotely...

The agreed-upon procedures engagement [sic] will commence no later than either the SCUSD approval date of this contract or June 3rd and will be drafted within *four weeks* after the commencement date and finalized by July 22nd.

Christy White letter to SCUSD dated May 15, 2024 and executed May 22, 2024 (emphasis added).

In fact, SCUSD originally requested that Christy White conduct “an independent forensic audit,” but Christy White rejected that request stating the following:

Hi Amanda, attached is my proposed AUP agreement. Below I have indicated in red (next to your input), how (or not) the proposal responds to your request. *For example, there are some legal issues about what constitutes a conflict of interest or if one even exists. As such, you might need to have legal counsel weigh in on some of your concerns.*

The scope in my proposal includes an ‘audit’ for expenditures that would be a large sample of personnel and non-personnel administrative costs, plus tying their underlaying [sic] data out to your reports and the financial audit. *The second major piece is analyzing the admin costs against other charters and other metrics (e.g. a small school district). There is no requirement for the level of standardized reporting for charters, unlike school districts. As such it is not an easy analysis but one that I have done before with client satisfaction.* I will comment on whether or not the admin costs appear at, below or above market.

Not that an agreed-upon procedure is an attestation service but not an audit in the sense that you might be familiar with. The reason is due to the district’s management direction and the specific nature of the services you requested which differ from a traditional financial or compliance audit.

Email from Christy White to Amanda Goldman dated May 14, 2024. (emphasis added).

SCUSD confirmed the above by summarizing Ms. White and Ms. Goldman’s conversation as follows:

1. Are SHPS books being maintained in a legally compliant manner consistent with professional standards? *Christy White response: We will test whether the costs are supported by the underlying accounting records but can't comment on the legality of the charges.*
2. Can SCUSD trust the reports received as accurate? *Christy White’s Response: our AUP report will sample financial data that supports the administrative charges and the reports provided to SCUSD.*

3. Is SHPS using public funds in a manner consistent with acceptable practices for employment of contractors and service providers? *Christy White's Response: we will test independent contractor agreements.*
4. Is SHPS spending more than typical on costs not associated with instruction and student outcomes? *Christy White's Response: I will compare the cost of administration to other charters and other metrics (such as what a small school district might spend percentage wise on administration).*
5. *Is the relationship between SHPS, SHA, and SHDC reasonable and appropriate under conflict-of-interest law/policy? Christy White's Response: this is a legal question that I cannot provide an opinion on.* But I will outline the relationship and whether it appears appropriate for a charter school.
6. Based on this review, is there any reason to suggest that SHPS would likely be financially unable to implement the academic program it is proposing due to mismanagement, or other reasons related to the concerns shared by the district or other parties? *Christy White's Response; our report will not draw a conclusion but will provide information to SCUSD for us in your oversight role and your conclusions, plus report any questionable practices known errors or potential fraud.*

Though SHPS has received a clean audit report, the district would like these questions reviewed with fresh eyes and an accounting of the process involved in reviewing them.

Amanda Goldman
Director, Innovative Schools, SCUSD
916-839-0335

A. Goldman email to C. White dated May 14, 2024. (emphasis added).

Notwithstanding Christy White's clear statements, SCUSD cites the Christy White report as the basis for concluding SHPS has deficiencies, does not comply with GAAP procedures, unsound fiscal practices and lack of internal controls. L. Allen letter to L. Ruda dated July 26, 2024, p. 4. Furthermore, SCUSD uses the report to call into question whether SHPS can meet their legal obligations after Christy White specifically advised SCUSD that they could not provide such an opinion.

2. SHPS' opportunity to provide information to Christy White was limited and resulted in Christy White drawing conclusions based on incomplete information.

Notwithstanding the fact that SCUSD first reached out to Christy White over three months ago, SHPS met with the Christy White team for 45 minutes, less than a week before their report was submitted to SCUSD, and only after SHPS requested, again, to meet with Christy White.

On Friday, May 10th, SCUSD advised SHPS it would begin an investigation regarding "concerns raised about St. HOPE Public Schools. . . ." L. Allen letter to L. Ruda dated May 10, 2024, p. 1. The next business day, Monday, May 13th, SHPS affirmed its commitment to cooperate by stating:

"[W]e look forward to responding to all inquiries and correcting the records as needed. In that regard, let me assure you of SHPS' full cooperation and transparency in the District's oversight of SHPS' charter schools. As we have always been, SHPS will continue to work diligently and swiftly to respond to all questions and requests for records from the District.

SHPS further advised "[f]or SHPS to most effectively and thoroughly respond to these concerns, as well as prepare any necessary documentation, please consider this communication a request for the production of all those written concerns [from July 1, 2022 to present...."

L. Ruda letter to L. Allen dated May 13, 2024.

On May 15th, two days later, Christy White requested that SCUSD "make an introduction for us to [SHPS] and let them know our timeline and that we will be setting up a zoom meeting and requesting data." Email from Christy White to Amanda Goldman dated May 15, 2024. Notwithstanding this request, neither SCUSD nor Christy White scheduled a zoom meeting with SHPS until SHPS requested such a meeting on July 9th.

Thanks again Amanda. Amanda (Long) and Christy, it is nice to meet you.

Can we find a time to jump on a Zoom sometime tomorrow (Wednesday) or Thursday? I understand that our counsel Lee Rosenberg reached out last week to request a meeting, but given the timing Amanda Goldman mentioned below, I wanted to make sure we had an opportunity to meet as well.

I want to ensure that your team has what you need to finish your report, and towards that end, we also want to provide operational background, connect dots, and provide clarification that may not be immediately apparent on the face of the documents that were requested. Since we haven't participated in prior meetings with your team and

Amanda Goldman/SCUSD, we are not sure what may and may not be part of the universe of known background information. We want to help make sure that your review takes into account all of the relevant information.

Email from Lisa Ruda to Amanda Goldman dated July 9, 2024 (emphasis added).

Only after that request on July 9th did representatives from Christy White first meet with SHPS on July 11th, nearly two months after Christy White had requested that SCUSD schedule an introductory meeting with SHPS. In fact, during that 45-minute discussion, SHPS learned that Christy White believed that SHPS had not submitted certain financial reports when in fact SHPS submitted those records and SCUSD staff had acknowledged they “accepted” the submission.

Hi Amanda G., Amanda L. and Christy,

I wanted to follow up after our call because I was really surprised to hear that you did not have the General Ledger items that you requested. I was actually the one who uploaded everything into Suralink and kept notes as to each item number.

When I went back and reviewed my own notes, I realized that I was absolutely under the impression that SCUSD and Bee had already uploaded the items for this request. When I went in to upload, I was unable to, and it stated that Bee had uploaded items and that those items were already accepted and checked off.

I truly apologize for this mix-up and we were in no way trying to not submit requested items. If I had been made aware of this outstanding request earlier, I would have ensured to have some workaround to get them to you sooner.

Email from Elisha Parsons to Amanda Goldman dated July 11, 2024. Fortunately, that error was caught and attributed to “It’s a new system. We are all learning,” as the consequences could have been even more severe for SHPS. Email from A. Goldman to E. Parsons dated July 11, 2024.

3. Other conclusions included in the Christy White Report were incorrect, ignored contrary evidence provided to them and/or was outside of the scope of their work.

The Christy White report includes several conclusions that are unsubstantiated, or based on incorrect or incomplete information. The unsubstantiated conclusions must draw into question the impartiality and objectivity of the report.

For example, Christy White claims that “SHPS did not shop the prices for reasonableness” but the report identifies no legal standards that it is applying or how this indicates the violation of any law

or standard. (Christy White Report, p. 3). In fact, this assertion is false and directly contradicted by the memorandum shared with SCUSD as part of this investigation and the public presentation made at the June 27, 2024 SHPS Board of Directors' Meeting prior to the Board's consideration of the proposed agreement with SHA for 2024-2025. The memorandum, meeting minutes and public presentation state as follows:

- **Back Office Services – Other Third-Party Vendors and Costs** *As part of this year's contract review, SHPS contacted outside vendors who provide back-office services (payroll, accounting, accounts payable, risk management, grant reporting) to charter schools. Costs for back-office services for SHA were aligned with those comparable charges, which are set forth below.*

Company	Fees Charged
	–\$5,000 setup, waived with 3-year agreement –Business Management: variable fee of 2% of total revenue for each reporting period –Payroll: \$25 per employee per month (if we switch to their system) –Student Management: \$35 per student
<u>Charter Impact</u>	~\$330,000 (\$86,000 per quarter)
<u>Delta Managed Solutions</u>	\$28,000 per month (2.1% of annual budget) - this is based on our second interim budget ~\$336,000
	In Progress
<u>EdTech</u>	Sample School 1 - 285 kids; \$198,000 Sample School 2 - 2.5% of revenue; \$128,296.75; 389 students

No third-party vendor we contacted provided comparable services (non-back office such as summer programming or even facilities and IT support) like SHPS receives from SHA or SHDC. In addition, no vendor felt a transition of the traditional back-office financial services prior to January 1, 2025, was prudent if SHPS was interested in a change in vendor. In addition, the costs to build an in-house finance department to perform these functions far exceeded the cost charged by any third party vendor making this option unrealistic.

(Emphasis added and copies of each supporting document is attached). What is incredibly troubling about this particular allegation is that the referenced memorandum to the SHPS BOD explaining the market research and included in the public presentation was again shared with

SCUSD and Christy White during the only meeting that they had with SHPS. Email from Lee Rosenberg to Christy White, Amanda Long and Amanda Goldman dated July 11 2024.

The Christy White report is replete with other unsubstantiated allegations that do not and should not taint the “clean audit” (to use SCUSD’s words) that SHPS has received:

- For example, Christy White concludes that job training, community development and student work experiences do not have an educational purpose or direct nexus to student outcomes. (Christy White Report, p. 3,16). This conclusion is completely contrary to the direction of the Secretary of Education which encouraged school districts to partner with community nonprofit organizations, such as SHA. (Guidance from Secretary of Education, November 14, 2022).
- Moreover, Christy White concludes SHA and SHDC are “related organizations” notwithstanding SHPS’ most recent Form 990 prepared and filed by CliftonLarsenAllen explicitly stated otherwise. (SHPS Form 990, Part IV). In addition, SHPS’ legal counsel has repeatedly shared that “Per the independent audits, 990s, and the SHPS’ corporate governance documents, SHPS is not a related or controlled entity of SHA/SHDC. SHPS does not control SHA/SHDC and the nature of their relationship is contractual, i.e., the executed contracts delineate the parties’ respective obligations and rights.” Email from Lee Rosenberg to Christy White, Amanda Long and Amanda Goldman dated July 11, 2024. While Christy White may not agree with this statement, failing to acknowledge that contradictory information was provided or that SHPS disagrees with their finding, calls into question the fairness and objectivity of their work.
- Christy White also concludes that there must be an improper conflict of interest due to Ms. Jennings’ role as SHPS Board Chairperson as she “likely has a role developing the back-office services agreement.” Christy White cites no evidence to support her conclusion and the minutes from the SHPS Board meetings where these contracts were approved state the opposite; Ms. Jennings was not present for the discussion and/or vote and Ms Ruda was clear that the agreements were developed by SHPS. Christy White never spoke with Ms. Jennings. (Christy White Report, p. 2).
- The Christy White report errs on the side of condemning SHPS. The report is void of objectivity and independence that Superintendent Allen committed at the time the investigation began. The subjectivity is evident in statements such as, “There may be an Education Code Section 35145 violation because ‘SHPS had no minutes posted’” Christy White Report, p. 2. There is no requirement that the minutes be posted, a fact which Christy White acknowledges later in her report (p. 9). Christy White similarly criticizes the number of Board meetings held in 2023-24, but gives no acknowledgement

to the fact that more meetings are scheduled for SY2024-25, approved by the SHPS BOD on June 27, 2024 and currently posted on the SHPS website. Fairness and objectivity require all facts to be presented.

- Christy White represents that “according to the auditor” books were not kept properly and the auditor “effectively closed the books.” Christy White never spoke with the SHPS auditors and there is no evidence in the audit that the auditor “closed the books.” Yet, Christy White arrived at that conclusion. (Christy White Report, p. 2). Christy White claims that the audit extension was needed for these unsupported reasons when the auditors submitted a letter to SCUSD in November 2023 that explained why the extension was needed; Christy White ignores those reasons and the reasons are never included in the Christy White report as described earlier in this response. Please see the discussion above and the attached letter from Lili Huang, CliftonLarsenAllen LLP, to The Authorizers of St. HOPE Public Schools dated November 6, 2023.

The above conclusions are particularly troublesome in light of the fact that SHPS repeatedly offered to meet with SCUSD’s investigators and expressed serious concern after our only meeting with Christy White that they would draw inaccurate conclusions without complete information.

I want to underscore that if there are any documents or information or context that is needed, SHPS stands ready to cooperate and assist, and I see my role here to support this objective and to ensure clarity. We don’t want the review team to be in a position where it needs to rely on assumptions or “workarounds” in order to generate conclusions when SHPS’ team is here to be a direct source of information.

If any negative inferences or conclusions might be drawn from a seeming absence of information or documentation, we really want to make sure that the issue is brought to SHPS attention so we can understand it and get the review team what they need. For example, we were not aware of the issue with the GL items until this morning, and we are very glad we had the discussion so that the misunderstanding was resolved. Email from Lee Rosenberg to Christy White, Amanda Long and Amanda Goldman dated July 11, 2024.

I also wanted to be clear that you (Amanda G., Amanda L. and/or Christy) are absolutely able to reach out directly to Lee or Elisha for any information requests or context you may need as you continue your work. We have asked Lee to assist in ensuring you each have direct access to either to facilitate your investigation and/or review. There is no need to go through as my response time will often be a bit slower due to my other responsibilities particularly as our staff arrives in just over a week to open the school year and we are putting the final touches on the first half of the PS7 Elementary construction project. Either

Lee or Elisha is fully authorized (and more than capable) to assist your work. Email from Lisa Ruda to Christy White, Amanda Long and Amanda Goldman dated July 11, 2024.

The Christy White Report gives significant weight to financial benefit that SHA and SHDC receives through its contracts with SHPS. Here, there is no for-profit vendor at issue; SCUSD is concerned with a non-profit organization, SHA, and that they may be apparently “profiting” from SHPS. We hope SCUSD will agree that it is in the public interest when public schools contract with California nonprofit public benefit organizations because such organizations, by law, lack shareholders and do not exist to generate profit; they exist to provide a public benefit. The same rationale would apply to SCUSD, which SHPS has paid nearly \$1.5 million in rent, oversight fees and facilities charges over the past year. Payments made from SHPS to SCUSD from July 1, 2022 to July 15, 2024. The fact that nonprofits charge for services and those charges support the organization as a whole is no different than the economic reality behind any vendor-vendee relationship.

Charges Paid by SHPS to SCUSD for 2022-23 and 2023-24 (Dollars)

Expense Category	2022-2023	2023-2024	Total
Custodial	133,227	90,911	224,139
Lease	729,262	697,439	1,426,701
Oversight Fee	0	223,062	223,062
Utilities	468,484	421,036	889,520
Work Order	3,555	0	3,555
Total	1,334,528	1,432,448	2,766,976

List of charges paid by SHPS to SCUSD for July 1, 2024 through July 18, 2024.

There are other allegations in the Christy White report to which SHPS objects, but SHPS believes continuing to recount each claim is not productive to the path forward that SHPS would like to build with SCUSD. SHPS has concluded that the report was not the independent, objective review of SHPS that was committed when SCUSD notified SHPS on May 10th that it would undertake this investigation. L. Allen letter to L. Ruda dated May 10, 2024, p. 3.

Conclusion

SHPS acknowledges the material weakness with respect to financial reporting exists, that SCUSD was aware of these issues prior to the current investigation, and that SCUSD did not raise any concerns prior to the eve of the charter renewal process. In the past it has been SHPS' experience in the past, before this current notice of concern, that SCUSD's concerns regarding SHPS' annual audit, or any other financial items, were addressed within the scope of annual oversight. This allowed any potential issues to be addressed immediately and for such oversight costs to be contained to the annual fees paid to SCUSD by SHPS.

We do not understand Christy White or SCUSD to have identified any issues that were different from or in addition to the matters described in SHPS' 2022-23 fiscal year audit or the timing of the completion of the audit. Additionally it is important to note that this same audit, on page 37, states, "There are no questioned costs as the adjustments identified were corrected by management" and on page 32 states, "In our opinion, the School complied, in all material respects, with the compliance requirements referred to above that are applicable to the School for the year ended June 30, 2023." While the audit did identify a material weakness, it also validated SHPS' compliance with requirements for the same school year and SCUSD's ultimate acknowledgement as it launched the current investigation, "SHPS has received a clean audit report." A. Goldman email to C. White dated May 14, 2024.

Notwithstanding these concerns, in this document, SHPS has set forth the specific plans it intends to implement in response to the concerns SCUSD has raised regarding SHPS contracting with St. HOPE Academy (SHA) to provide back office services. In conclusion, SHPS will take significant, meaningful operational changes to increase SCUSD and the public's confidence in SHPS' back-office services.



Action Plan #2

**Addressing Concerns Regarding
the Employment of
Qualified/Credentialed Educators**

SHPS Action Plan #2
Addressing Concerns Regarding the
Employment of Qualified/Credentialed Educators

In this document, SHPS describes the specific plans it intends to implement in response to the concerns SCUSD has raised regarding SHPS' credentialed classroom educators. SCUSD has stated it "would hope to see SHPS develop a comprehensive corrective action plan detailing the manner in which it will remedy the staffing, credentialing and vacancy issues above." L. Allen letter to L. Ruda dated July 26, 2024, p. 6. SHPS reviewed the information shared by SCUSD, in addition to SHPS' significant actions taken starting as early as the Fall of 2022, and developed a response to SCUSD as well as detailed next steps to ensure a resolution of this concern. In response to SCUSD's concern on this topic, SHPS provides the following information and commits to the following actions, both of which are further detailed below:

1. SHPS has and will continue to verify teacher credentials as part of the hiring process.
2. SHPS will continue to make efforts to minimize the use of emergency credentials.
3. SHPS has and will continue to implement and monitor credential agreements to ensure staff are working towards appropriate credentials.
4. SHPS confirms and submits supporting documents to verify that certificated assignments in the 2024-25 school year are held by an employee authorized, or who will be authorized upon approval of the submissions pending with the California Commission on Teacher Credentialing ("CTC") for the assignment under Education Code Section 47605(l).
5. SHPS offers to meet quarterly with SCUSD to review credentialing status for SHPS teachers to ensure SCUSD has current and accurate data that may not be available to SCUSD.
6. SHPS will continue to work with its teachers and SCTA to identify ways to further support teachers who need to secure their preliminary or clear credentials.

Introduction

Over the course of the past two years, SHPS has thoughtfully and strategically built its internal Human Resource team related to credentialing and compliance, and increased its ability to recruit credentialed staff, or to hire staff who will be able to earn their preliminary or clear credential. SHPS has also taken steps to provide financial assistance for teachers with emergency permits or waivers to incentivize them to secure their preliminary and clear credentials. Combined with a new salary schedule, which explicitly ties base salary to credential type, and providing increased supports, such as commercial curriculum, to teachers, SHPS is better positioned to retain and attract teachers who have or will secure an effective credential. SHPS commits to continue to build

on these changes to ensure its educator workforce is both qualified and credentialed and ultimately able to improve student outcomes.

Below SHPS describes the specific changes it has made, starting with the Fall of 2022, as these adjustments form the foundation of this corrective action plan. In addition, SHPS will demonstrate that it fulfills the representations made in its charter petitions. This response and the linked or attached supporting documents also includes the actual CTC document number, credential agreement and, where appropriate, screenshots to demonstrate full compliance with credential requirements which is not possible through “public” access to the CTC database.

SCUSD’s Allegations and SHPS’ Response

SCUSD’s allegation: Both charters for PS7 and Sac High, as well as the submitted renewal petitions, which are pending before SCUSD, include language that *SHPS will verify teacher credentials* as part of the hiring process, make efforts to *minimize the use of emergency credentials* through recruitment and retention efforts, and *implement credential agreements* to ensure staff are working towards the appropriate credential. *Despite these assurances, however, both the number and decreasing trend of teachers with a “regular” credential (specifically preliminary and clear credentials) create significant concerns for the District.* Letter from L. Allen to L. Ruda dated July 26, 2024, p. 5 (emphasis added).

SHPS’s response to the allegation: SHPS has fulfilled the above three underlined representations. SHPS has also provided data to demonstrate the correct results regarding the credential status for teachers of record at both PS7 and Sac High. This additional data is intended to correct the record cited in SCUSD’s Notice to Cure. As a result of the data provided, SHPS maintains that over the past two years it has remedied, refuted, where applicable, and meaningfully addressed the concerns raised relative to credentialed educators at pages 4-6 of the SCUSD Superintendent’s July 26th letter.

For clarification only, SHPS’ existing charter petitions do not require SHPS to implement credential agreements. However, SHPS has included credential agreements as part of the hiring process over the past two school years and has memorialized this commitment as part of the renewal charter petitions for the period of July 1, 2025 through June 30, 2030.

Background and Context

Operational and Structural Changes

As part of the hiring process, SHPS verifies the credentials of any candidate for a teaching position or other position that requires a credential (e.g. school psychologist). In the event a candidate does not already possess an effective credential, SHPS collects all necessary information, as well as any paperwork, to determine if the candidate would be eligible to obtain a permit or a waiver, and if they are on track to obtaining an effective credential.

In Fall, 2022 SHPS began increasing its investment in its Human Resources Department. At that time, teacher recruitment and hiring were the responsibility of SHPS’ back-office provider, a third-

party vendor external to SHPS¹. As SHPS built up its HR Department, it did so with a specific focus on supporting teacher credentialing to be led by the Human Resources Manager, who was specifically charged with the following responsibilities:

Excerpt from Human Resources Manager Job Description

Credential Compliance and Review

- *Work with Teachers and Teaching Staff to ensure up-to-date credentials for their current assignment and role.*
- *Refine Credentialing process & procedure of the hiring process*
- *Collect all appropriate documentation from teaching staff and new hires to confirm credential accuracy and eligibility.*
- *During the hiring process, review candidate credentials, and create credential agreements to ensure compliance for specific roles.*
- *Follow up on all Credential Agreements throughout the year to ensure completion.*
- *Audit teaching staff credentials to ensure compliance, and complete/submit audit requests yearly regarding credentials.*
- *Communicate with the CTC in regard to credential questions and also turning in employee paperwork to ensure credential compliance.*

SHPS Human Resources Manager Job Description, p. 4 (Emphasis added).

In October 2022, SHPS hired Sabrina Jaquez, a teacher credentialing specialist previously employed by SCUSD, to fill the SHPS Human Resource Manager position, which she continues to hold. Ms. Jaquez’s resume is included with the supporting documentation provided. Over the remainder of the 22-23 school year, Ms. Jaquez worked with our back-office provider to transition many of the non-payroll HR functions back to SHPS.

During the onboarding process, and as candidates without clear credentials receive offers of employment, SHPS provides candidates with support in how to navigate the procedures and processes of obtaining a California credential, as well as options for credential programs. SHPS’ HR team meets with every single candidate during onboarding to review the next steps in credential agreements. The HR Manager also schedules individual check-ins with those who do not have a clear credential in order to provide them with an overview of the different credential programs and pathways available to earn a clear credential, as well as the pricing by program so candidates can make informed decisions on their next steps to become a credentialed teacher. For those teachers and candidates with a preliminary credential, SHPS enrolls them into the Sacramento County Office of Education’s (“SCO”) Induction Program and provides them with

¹ See SHA+SHPS Statement of Work 2020-21, page 5-6. “Staff Recruitment: SHA manages staff recruitment including job posting, job fairs, opportunities for school leaders to speak at high value candidate venues, candidate resume and phone screening, interview scheduling, candidate qualification checks including credentialing, background compliance, and reference checks if requested by the hiring manager.” The current scope of work has no reference to staff recruitment, hiring or credentialing. Please see the current scope of work for SHA 2024-25. Those functions are now performed by SHPS’s Human Resources department.

a mentor in order for them to earn their clear credential. SCOE Induction is fully paid for by SHPS for our teachers.

In May 2023, SHPS added the position of HR Assistant to support the HR Manager and the Human Resources Department. See the [HR Assistant Job Description](#). The position was expanded from temporary to permanent in Spring 2024 and has been occupied by the same person since it was created.

In July 2023, SHPS created the office of Staff and Student Recruitment and the position of Director of Student and Staff Recruitment. This director level role complements the work of the HR Manager by focusing directly on staff recruitment and allowing the HR Manager to focus on compliance, particularly with respect to credentialing. Please see page 2 of the [Director of Student and Staff Recruitment Job Description](#). SHPS hired Lesley Ezero to fill the position, which she continues to hold. Ms. Ezero has worked with SHPS for over 10 years, served as both a classroom teacher and school principal and holds her clear teaching credential. [Ms. Ezero's resume](#) is also included. Through this office, the recruitment team now attends nearly 30 off site hiring fairs; SHPS held its first onsite hiring fair this summer.

New Salary Schedules and Teacher Resources to Support Credentialing

SHPS has also taken steps to incentivize teachers with emergency permits or waivers to secure their preliminary and clear credentials including the following:

- During Summer of 2023, SHPS increased the starting salary for new teachers to \$60,000 and offered signing bonuses to new candidates. While candidates are not members of Sacramento City Teachers Association (SCTA²), upon hire, they become unit members. As a result, we were not able to unilaterally increase the base salary of existing employees.
- In February 2024, SHPS offered credentialing support (\$5,000 per teacher per year up to \$10,000) in exchange for securing their intern credential and remaining with SHPS for a specific period. SCTA rejected this offer and, to date, it has not been implemented as SHPS cannot unilaterally act due to labor laws. [SHPS Proposal to SCTA Dated February 9, 2024](#), p. 2-3. SCTA filed a declaration of impasse less than an hour after receiving the proposal. SHPS remains committed to working with SCTA to assist teachers with the financial costs associated with credentialing.
- SHPS issued 2024-25 offer letters for returning staff in March, 2024 (compared to June as had been the practice). Providing these offer letters earlier in the year is part of a purposeful

² While not referenced in Superintendent Allen's July 26th letter, earlier correspondence from SCUSD to SHPS expressed "concerns" about SHPS's "employment practices, including interference with union activities, as well as allegations that SHPS has repeatedly violated labor laws" [L. Allen letter to L. Ruda dated May 10, 2024](#), p. 2. As discussed further, SHPS have reached agreements relative to base salary and health benefits over the past 90 days and unfair labor practice charges have been reduced from 14 to 2, one of which was filed by SHPS against SCTA. See [PERB pending case](#), attached.

staffing strategy to retain qualified, well-performing teachers. Representative 2024_25 offer letter for PS7 and Sac High staff, attached.

- This year, SHPS has purchased curriculum for grades TK-12 in ELA and Math and grades 3-8 in Science in an effort to further support teachers who may be starting their teaching careers and navigating the credentialing process. Outside of a pilot program instituted at PS7 Elementary in December 2023, SHPS had relied exclusively on a teacher-made curriculum for several years, especially during the distance learning required during the COVID-19 pandemic. However after a thoughtful review and analysis of this practice, we have now shifted to a new approach of providing teachers with a commercial curriculum. SHPS believes that by providing these resources, teachers will be better supported and ultimately more likely to continue towards their clear credential and remain at SHPS.
- In June 2024 SHPS reached an agreement with SCTA relative to base salary compensation through which salaries for existing staff were raised for the first time since 2018-2019. Starting salaries for teaching staff are now a function of the type of credential they hold. The preferred credential, incentivized through the salary schedule below, is a “clear” credential, which requires a teacher to be teaching for at least two years and to participate in coursework known as Induction through the Sacramento County Office of Education.

Credential Type	SHPS Current Salary Range/(Average if Range)	New Base Salary 2023-24	New Base Salary 2024-25
Clear	\$62,724-85,486 (\$71,510)	75,000	77,625
Preliminary	\$55,467-79,802 (\$64,725)	67,000	69,345
Intern	\$55,467	63,000	65,205
Emergency (all)	\$55,467-\$70,000 (\$60,026)	62,000	64,170
Psychologist	\$87,416	87,000	90,045

Memorandum of Understanding SHPS Proposal to SCTA, June 5, 2024 (Compensation for 2023-2024 and 2024-2025).

Since the Fall of 2022, SHPS has strategically built its in-house Human Resource team to increase its ability to recruit credentialed staff or to hire staff who will be able to complete the credentialing process. Combined with a new salary schedule, which ties base salary to credential type, as well as investments in curriculum, SHPS will continue to retain and attract teachers who have or will secure an effective credential.

Going Forward – SHPS’ Action Plan

1. SHPS Has And Will Continue To Verify Teacher Credentials As Part Of The Hiring Process.

The SHPS HR Manager, an experienced credentialing specialist, has ensured that all 2024-25 teachers of record have or can secure effective credentials, or have an application pending and processing before the CTC, which when issued, will be retroactive to August 1, 2024. This fact is evidence of SHPS’ actions working to both address the concerns noted by SCUSD and ensure all students have a teacher authorized to deliver instruction.

The SHPS recruitment process prioritizes and prefers candidates with clear credentials, followed by preliminary credentials. If the most qualified candidate available for a position does not hold an active intern, preliminary or clear credential, the HR Manager executes a credentialing agreement with the candidate and monitors compliance and expected progress towards a clear credential as laid out in the credential agreement. This credentialing agreement is in addition to ensuring the educator has the requisite paperwork to be eligible to be the teacher of record at SHPS.

A list of all SHPS staff members in positions that require a credential for 2022-23, 2023-24 and 2024-25 is attached. The list delineates the following:

1. The type of credential or permit held by the staff member.
2. Whether SHPS has executed a credentialing agreement with the staff member.
3. The staff member’s date of hire.
4. The CTC document number, which allows the reader to look up the staff member’s credential. We have also linked a “screenshot” of the CTC website that documents the specific permit or credential the SHPS staff member possesses.

The list is current as of August 5, 2024 and is summarized in the chart below:.

SHPS Staff by Credential/Permit Type for 2022-23- 2024-25*

	Credential	2022-23	2023-24	2024-25
	Clear	8	10	12
	Preliminary	6	10	12
	Intern	6	4	4
<i>Emergency</i>	PIP	2	6	13
<i>Emergency</i>	STSP	13	17	10
<i>Emergency</i>	SELAP	1	0	0
<i>Emergency</i>	ETK	0	0	1
<i>Emergency</i>	Emergency	1	0	0
	Waiver	0	7	0
	30 Day Sub Permit	2	1	3
		39	55	55

*2022-23, 2023-24 are current as of the first day of 4th quarter (March) to account for CTC processing delay; 2024-25 is current as of 8/5/2024.

The attached list establishes the following:

- All SHPS teachers possess or have an application pending before the CTC for the certificate, permit or other document as specified in Education Code Section 47605(l).
- All SHPS staff members without an existing intern, preliminary, or clear credential have a credential agreement as part of the SHPS hiring process to ensure they are working towards their clear credential.
- More SHPS teachers have “effective,” “preliminary” and “clear” credentials than in 2022-23.

2. SHPS Will Continue to Make Efforts To Minimize The Use Of Emergency Credentials.

As SCUSD acknowledges:

Education Code section 47605(l) provides that “teachers in charter schools shall hold the Commission on Teacher Credentialing certificate, permit, or other document required for the teacher’s certificated assignment” and such documents shall be maintained on file at the charter school. A charter school’s governing board may use local assignment options authorized in statute and regulations for the purpose of legally assigning certificated teachers in the same manner as a governing board of a school district. A charter school “shall have the authority to request an emergency permit or a waiver from the Commission on Teacher Credentialing for individuals in the same manner as a school district.”

Letter from L. Allen to L. Ruda dated July 26, 2024, page 4.

SHPS has focused its efforts on continuing to minimize the use of emergency permits and waivers for credentialed team members.

The table below shows an overview of the SHPS staff with emergency permits or waivers throughout 2022-23, 2023-24 and 2024-25. The list establishes and shows the following:

1. SHPS has had a decrease of six (6) emergency permits or waivers for team members from 2023-24 to 2024-25.
2. This list also includes those team members who only have emergency permits/waivers to ensure SHPS is in compliance while they are teaching and awaiting their recommendation to the CTC from their credential program.
3. This list will thus decrease for 2024-25 by two team members - one in the PIP category and one in the STSP category.

SHPS Staff with Emergency Permits or Waivers for 2022-23- 2024-25*

	Credential	2022-23	2023-24	2024-25
<i>Emergency</i>	PIP	2	6	13
<i>Emergency</i>	STSP	13	17	10
<i>Emergency</i>	SELAP	1	0	0
<i>Emergency</i>	ETK	0	0	1
<i>Emergency</i>	Emergency	1	0	0
	Waiver	0	7	0
		17	30	24

Title 5 of the California Code of Regulations requires local education agencies (“LEA”), including SCUSD and SHPS, to submit to the California Commission on Teacher Credentialing (CTC) an annual Declaration of Need for Fully Qualified Educators (Declaration of Need). The Declaration of Need enables the LEA to request emergency authorizations for positions. The governing board of the LEA must approve the Declaration of Need.

The Declaration of Need includes the following information:

1. The title and number of each type of emergency authorization and limited assignment permit which the LEA estimates based on previous year actual needs and projections of enrollment,
2. A brief description of efforts that the LEA has undertaken to locate and recruit individuals who hold the needed credentials; and
3. Efforts to establish alternative training options shall include the identification of the institutions of higher learning who have co-sponsored internship programs.

Copies of the last two Declaration of Needs filed by SHPS (for PS7 and Sac High), and approved by the SHPS Board, are attached. While SHPS continues to need emergency authorizations for some teachers, the number of teachers who need emergency authorizations has been reduced from 34 to 11 as we opened the current 2024-25 school year³. The Declaration of Need for 2024-25 was approved by the SHPS Board for the maximum amount of possible emergency authorizations needed, but as of the submission of this corrective action, SHPS is only utilizing three (3) emergency authorizations.

³ Five (5) of the eleven special permits needed are the “CLAD” permit which allows credentialed teachers to teach English Language Learners. In most of these instances, the teacher is already credentialed in the content area they will teach.

Declaration of Need; Emergency Authorizations Requested for 2022-23 and 2024-25

Permit Type	Area	2022-23*	2024-25	Notes
Emergency Authorizations				
	CLAD	3	5	This is NOT a credential to teach.
	Emergency TK	0	2	Added TK room.
	Resource Specialist	5	0	Education specialists
Limited Assignment Permits				
	Single Subject	23	3	
	Special Education	3	1	
		34	11	

3. SHPS Has and Will Continue to Implement Credential Agreements To Ensure Staff Are Working Towards Appropriate Credentials.

For clarification only, SHPS' existing charter petitions do not require SHPS to implement credential agreements. However, SHPS has included credential agreements as part of the hiring process over the past two school years and has memorialized this commitment as part of the renewal charter petitions for the period of July 1, 2025 through June 30, 2030.

As stated previously, all SHPS employed teachers without existing intern, preliminary or clear credentials have credential agreements with SHPS. Copies of the credentialing agreements are attached.

4. SHPS Provided Data to Demonstrate the Correct Results Regarding the Credential Status for Teachers of Record at Both PS7 and Sac High.

The number of SHPS teachers with clear credentials has increased from 8 teachers to 12, or by 50%, from 2022-23 to this school year. A list of SHPS staff members with clear credentials, including the CTC document number for their credential and a screenshot of their credential type from the CTC website has been attached.

The number of SHPS teachers with preliminary credentials has doubled since 2022-23 to this school year, increasing from 6 teachers to 12. A list of SHPS staff members with preliminary credentials, including the CTC document number for their credential and a screenshot of their credential type from the CTC website has been attached.

Assuming “regular” or “effective” credential is defined as SHPS staff with clear or preliminary credentials, that number has also increased over the past two years from 14 to 24 teachers as evidenced by the same attached staff list.

If teachers with “intern” credentials are included in any definition of “regular” or “effective,” which is in alignment with CDE’s definition, the total number of teachers with clear, preliminary or intern credentials has continued to increase, although presently only 4 teachers have intern credentials (compared to 6 in 2022-23). The expectation is that teachers with intern credentials progress to a higher level of credential.

In addition and as described below, two teachers who held emergency permits have applications for a higher level credential pending and waiting to be processed by the CTC. Once processed, the number of SHPS staff members with intern credentials will increase from 4 to 6.

Assuming these two final intern credentials are granted, the total number of teachers with effective credentials at SHPS will have increased from 20 to 30 - an increase of 50% from 2022-23 to 2024-25.

5. SHPS Offers To Meet Quarterly With SCUSD for 2024-25 and 2025-26 To Review SHPS’ Efforts To Reduce the Number of Emergency Permits

In an effort to help SCUSD monitor SHPS’ work to reduce the number of emergency permits needed, and to ensure SCUSD has the most accurate and current data, SHPS offers to meet quarterly with SCUSD as requested to demonstrate the following:

1. SHPS continues to verify teacher credentials as part of the hiring process;
2. SHPS makes efforts to minimize the use of emergency credentials; and
3. SHPS implements credential agreements for all teaching staff without a preliminary, clear or an existing intern credential to ensure staff are working towards the appropriate credential.

Reporting and monitoring of teacher credentialing was done by SCUSD in the past as part of the annual oversight process. It is SHPS’ desire to restore this practice to ensure any questions or concerns about credentials are handled as they arise and through the annual oversight process.

6. SHPS Will Continue to Work With its Teachers and SCTA to Identify Ways to Further Support Teachers Who Need to Secure Their Clear Credentials.

SHPS remains eager to find other ways to help teachers reduce the burden (both financial and otherwise) of the credentialing process. As noted above, SHPS proposed credentialing support (\$5,000 per teacher per year up to \$10,000) in exchange for securing their credential and remaining with SHPS for a specific period. In less than an hour, SCTA rejected this offer and filed a declaration of impasse. To date, the proposal has not been implemented as SHPS cannot unilaterally act due to labor laws. SHPS Proposal to SCTA Dated February 9, 2024, p. 2-3. SHPS will continue to work with SCTA to attempt to reach an agreement that will support teachers working towards their clear credential.

SHPS is also committed, through its own HR Department or through other outside partners, to finding ways to help teachers navigate and continue to move closer to earning their clear credential.

For example, in 2023-24 SHPS became one of two charter school networks to partner with Sac State as a member of the SMSTR Residency program. This program places Special Education teaching residents in schools for a semester at a time. SHPS was able to secure a resident who stayed for the entire 2023-24 school year, and SHPS has secured two (2) residents for the 2024-25 school year - one (1) per semester. The agreement with the SMSTR Residency program identifies one of the residents will be employed with SHPS for a minimum of four (4) years, during which they will hold an effective credential and be an Education Specialist. This partnership supports SHPS' commitment to collaborating and partnering with other organizations to increase the number of teachers with effective credentials. SHPS will look to expand these types of partnerships with credentialing agencies throughout the Sacramento region and Northern California.

Data Clarifications

1. Limitations of "Public Data"

SCUSD's letter dated July 26, 2024, includes several statements relative to the credentials held by SHPS staff based on "public data" or data that "is not yet available for public access." L. Allen letter to L. Ruda dated July 26, 2024, p. 5-6. As SCUSD is aware, the publicly available data is very different from the access SHPS, and SCUSD, have as employers. In fact, SCUSD, through public data, would not be able to account for changes in last names due to marriage or other reasons, nor would they be able to discern between two people with the same name. A staff member with the current last name of "James" would appear not to have a credential if they cleared their credential under the last name "Williams," which may have been the individual's last name, prior to marriage and at the time they cleared their credential.

In addition, the data presented in Superintendent Allen's letter to SHPS dated July 26, 2024 is limited from 2020-21 through 2022-23. As SCUSD undoubtedly knows, following the COVID-19 pandemic a record number of teachers across the nation left education in favor of other professions. The result was that school districts needed to hire individuals who had not necessarily pursued a teaching career in college. The number of emergency permits for schools like SHPS and across the country increased over the period cited by SCUSD.

Finally, SCUSD notes that there are discrepancies between the staff lists that SHPS provided for review and the data reported by the state in the California Department of Education's (CDE) DataQuest database. L. Allen letter to L. Ruda dated July 26, 2024, p. 6.

SHPS acknowledges these discrepancies are due to the fact these lists were provided at two different points in the school year. DataQuest is based on data that is available as of the first week of October each year. The data SHPS provided to SCUSD was data pulled from the end of the 23-24 school year, so in June of 2024, and we confirm the list accurately reflects the credentialing status of SHPS employees as of June 2024. Again, by meeting quarterly with SCUSD to review staffing and credentialing data, SHPS proposes to ensure SCUSD has the most accurate and up to date data.

2. Clarification of Claims Regarding PS7 Staff With Expiring Permits

Superintendent Allen's July 26th letter states that "16 of the 25 teachers on staff at PS7 (64%) were serving under waivers or permits that expired at the end of June/beginning of July or will expire as of September 1, 2024 – all of which are not renewable." L. Allen letter to L. Ruda dated July 26, 2024, p. 5-6.

To the extent this statement leads a reader to believe these 16 teachers will not have any waiver or permit once their current waiver or permit expires, SHPS refutes that allegation.

For clarification, 12 out of 19 PS7 teachers held permits or credentials which expired or expire before September 1, 2024. For each of these 12 teachers, SHPS has already applied for new permits, which will be retroactive to August 1, 2024 and will allow them to continue teaching, without interruption, for 2024-25. Those permit applications are pending with the CTC. The CTC processing timelines are lengthy, as SCUSD is aware, and, as a result, to ensure these 12 teachers are in compliance with state law, SHPS has filed Temporary County Certificates ("TCC permits"). The TCC permits were submitted between July 30, 2024 and August 20, 2024 to the credential analyst of SCUSD. SHPS cannot directly submit these permits to SCOE. SCUSD must submit them to SCOE on behalf of SHPS and it has been communicated to SHPS, by SCUSD, that the submissions to SCOE are pending at the time of this response.

SHPS has also communicated with SCUSD and SCOE in order to file TCC permits as an additional safeguard to ensure these SHPS staff members possess the required document to teach while the CTC has caught up with the paperwork and the waivers/permits are posted. These SHPS staff members also have a Credential Agreement with SHPS that includes items they must work to complete to progress to a clear credential. These items will allow the PS7 teachers to continue teaching, without any interruption. The individuals described above, including the permit they held last school year and the permit or credential we expect them to have once the CTC completes processing the pending applications, are reflected below:

	Employee Initials	23-24 Permit/Waiver	24-25 Permit/Waiver
1	M.A.	STSP	PIP
2	R.C.	STSP	PIP
3	J.H.	PIP	NA - now Intern eligible
4	K.K.	Waiver	STSP
5	A.M.	Waiver	STSP
6	B.S.	PIP	ETK

7	R.B.	STSP	NA - now Intern eligible
8	R.H.	STSP	PIP
9	S.H.	STSP	PIP
10	M.H.	STSP	PIP
11	B.H-T.	STSP	PIP
12	L.W.	Waiver	STSP

Please note that of the 12 teachers listed above, two (2) teachers will receive their intern credential, a higher level credential, when the CTC approves their application.

3. Clarification Around SHPS' Special Education Program

Superintendent Allen's July 26th letter states "It is unclear how PS7 and SCHS were able to appropriately staff their special education classrooms and programs, unless there were additional and unidentified substitute teachers and/or staff who provided instruction at other times during the school year." L. Allen letter to L. Ruda dated July 26, 2024, p. 6.

SHPS appreciates SCUSD leaves room for the fact that "there may be a plausible explanation for these findings" (L. Allen letter to L. Ruda dated July 26, 2024, p. 6) and believes SCUSD's allegation is based on a misunderstanding of SHPS' special education program. SHPS employs a full inclusion model to deliver its Special Education Program at both PS7 and Sac High. Students with special needs are in a general education classroom for the maximum amount of time possible (e.g. a student receiving speech services may receive them outside of the general education classroom, but their academic instruction occurs with the student's general education peers). This means our Special Education staff co-teach with our General Education staff, but in all cases, our General Education staff serve as the teachers of record for the courses in which SHPS students are enrolled, including students with special needs. Our Education Specialists who manage student IEPs all hold a valid Special Education credential or permit and our Teaching Assistants have proper credentials (they are more qualified than Instructional Aides who work in other districts who are only required to have a high school diploma). As part of our inclusion model, our students with special needs are also taught by General Education staff who also have proper credentials or permits.

Please note, we have purposely chosen to implement an inclusion model because it has been proven to better serve our students with special needs and ensure they are not separated from their peers.

All students enrolled in these classes benefit from the lower student to teacher ratio and additional expertise that comes from having two teachers in one classroom⁴.

Conclusion

SHPS' corrective action plan relative to teacher credentialing will maintain and build upon the structural changes made over the course of the past two years. SHPS has thoughtfully and strategically built its internal Human Resource team and transitioned functions related to credentialing and compliance from a third-party to SHPS, and increased its ability to recruit credentialed staff or to hire staff who will be able to complete the credentialing process. As a result, SHPS Human Resources now verifies teacher credentials as part of the hiring process, and executes and monitors credential agreements when a teacher does not hold an existing intern, preliminary or clear credential.

SHPS remains committed to minimizing the use of emergency credentials. Combined with a new salary schedule which ties base salary to credential type, SHPS believes it will retain and attract teachers who have or will secure an effective credential. SHPS will continue to work with teachers and SCTA to identify ways to further support teachers who need to secure their preliminary or clear credentials.

Finally, SHPS welcomes the opportunity to meet regularly with SCUSD to review its efforts related to teacher credentialing and credential agreements. Through those conversations and the course of annual oversight, we can ensure SCUSD has the most current information which is not available through public databases, as well as partner together to continue to identify best practices to support teachers seeking their preliminary or clear credentials and to support teacher recruitment.

⁴ In addition, to help increase capacity to support all students, we added an Inclusion Coordinator and two credentialed Mental Health and Wellness Coordinators to increase student support and interventions, specifically focused on students with MTSS (Multi-Tiered Systems of Support - which is a framework utilized in education to support data driven decisions and implementation of strategies in order to meet the needs of all students) meetings and review, SST plans, 504 plans, or students receiving Tier 2 interventions, as well as to consult with teachers, families, and staff to support progress. These positions were added to best support increasing student needs following the disruptions to school, and life, caused by the pandemic.



Action Plan #3

Addressing Concerns Regarding the Appearance of Conflict of Interests

SHPS Action Plan #3
Addressing Concerns Regarding the Appearance of Conflicts of Interest

In this section, SHPS describes the specific plans it intends to implement in response to the concerns SCUSD has raised regarding SHPS' contracting practices with SHA and SHDC, and the "possible" "appearance" of conflicts of interest related to those relationships. SCUSD states in its Notice to Cure, "While acknowledging SHPS autonomy to seek out services to serve students, the District hopes to see SHPS identify specific actions it will take to unwind, clarify or resolve the interrelatedness of the SHPS-connected entities, any financial interests held by officers/board members, and the holding of incompatible offices (e.g., resignation from position or Board role, establishment of time-accounting records for services provided, etc.)." (p. 9.)

To address these concerns, as further detailed below, SHPS will take the following actions:

1. Ms. Jennings will resign from SHPS Board effective September 30, 2024 and after SCUSD approves SHPS' requested charter renewals, notwithstanding that Government Code Section 1091 authorizes her continued service. The next regular SHPS Board of Directors meeting is September 12, 2024 at which time, the Board can appoint a new Chairperson and plan appropriately for the transition.
2. SHPS will amend its bylaws to preclude any officer, director, or employee of a vendor or intended vendor from serving on SHPS' Board.
3. SHPS will ensure that any legal matters involving SHA, SHDC or the St. HOPE Endowment are addressed by outside legal counsel and not by Kevin Heistand. SHPS' Superintendent shall be responsible for directing legal services accordingly.
4. SHPS will issue public RFP for back-office services and impose contractual terms that ensure increased vendor accountability. Please see SHPS' response in Action Plan #1 which provides a detailed outline of the forthcoming RFP process.
5. SHPS has updated its 2024-25 LCAPs to reflect how the funds to SHA tie to student outcomes.

While SHPS does not agree with all conclusions drawn by SCUSD, SHPS has and will undertake these significant meaningful operational changes to increase SCUSD's and the public's confidence in SHPS' operations and contracting decisions, as noted above and described in additional detail below. Notwithstanding SHPS' commitment to implement the changes below, SHPS believes it is important to understand there is and has been no violation of the law, and we ask SCUSD consider the following context and background as relevant to SHPS' assessment of the appropriate path forward.

Background, Context, and Responses to Concerns

SHPS' Operational Approach and Justification for Work To Date With SHA/SHDC

As an initial matter, SHPS understands and respects that as chartering authority to Sac High and PS7, SCUSD has a duty to review fiscal concerns related to the charter schools it authorizes, including oversight that public funds are appropriately spent. With that said, SHPS is disappointed that throughout this investigative process it does not appear SCUSD has considered that SHPS' charter schools are producing above-average results for students who have historically been left behind while receiving approximately the same level of funding as public schools throughout the state. See Table 1 in the Appendix.

We do not offer this comparison and figures to disparage SCUSD or to take away focus from concerns regarding SHPS – this data is about SHPS and not SCUSD. We all have much work to do to raise achievement for Black and Hispanic/Latino students. We offer these data points because they are part of the important global context that what SHPS is doing is working for Sacramento students, and what is working is that SHPS operates differently than traditional public schools and, for those students who choose SHPS, this different mode of operation is producing results. After all, it stands that if SHPS operated its charter schools the exact same way as traditional public schools, its results would likely be the same as those traditional schools.

We agree wholeheartedly with the principle that program success does not, and would not, excuse the misuse of public funds. SHPS' success *does* validate that its operational approach is benefiting students and is proving the schools' use of public funds is effective and responsible. That approach includes, for example, allowing SHPS administration to focus on the core academic programming while outsourcing non-core functions (e.g., backoffice, facilities, information technology, etc.) to separate mission-aligned nonprofit organizations.

And so, in the absence of evidence of fraud or actual waste (of which there is none) the abstract concern that SHPS may not be prudently using public funds for the benefit of its students is disproven by SHPS' results. However, SCUSD's Notice to Cure does not explain any actual student harm caused by SHPS' expenditures so we are only left to respond to unspecified concerns that are not grounded in any demonstrable, actual evidence that something harmful is happening. It is challenging to prove a negative, and the mere allegation creates public distrust when SHPS' actual results should be a source of trust, credibility and joint celebration.

It is problematic that Christy White's report suggests SHPS' administrative expenditures for its schools should be judged against districts serving similar numbers of students. Respectfully, those schools look nothing like SHPS in the high concentration of socioeconomically disadvantaged Black and Hispanic/Latino students served at PS7 and Sac High, and there is no evidence those schools have supported the same outcomes for their Black and Hispanic/Latino students as SHPS. See Appendix Table 2.

Moreover, it is simply not fair to conclude the cost of SHA's back office services are unreasonable because SHA provides far more than back office services as detailed in the attached SHPS Board memorandum. (See Attachment S2024-25 SHA + SHPS Statement of Work.) For example, SHPS'

back office contracts include costs like custodial services for the schoolsites, a cost not reflected in Christy White's analysis. There are other similar flaws, but this is a clear example.

By comparing SHPS to the school districts identified in Table 2, Christy White's report suggests SHPS is paying "excess amounts" by outsourcing administrative functions. This misses the point: of course *insourcing* can save dollars in some instances when adding duties and functions to existing staff - but that is not necessarily a prudent choice when staff should be focusing on other core matters. Outsourcing is often operationally necessary, i.e., recently SHPS had to outsource landscaping because SCUSD would not provide that service going forward as part of a facilities use agreement and SHPS does not have the capacity to employ the staff necessary for such a job.

In many instances, insourcing can actually be more expensive than outsourcing. As described earlier, SHPS made the decision in the Fall of 2022 to transition hiring, recruitment and credentialing to an in-house Human Resource Department due to the fact that SHPS believed it could better recruit and support teacher credentialing through a team of SHPS staff. However, the rebuild of the internal SHPS team ultimately costs SHPS more than outsourcing the function - notwithstanding the fact SHPS reduced the contracted amount for a vendor to reflect this transition of functions back to SHPS.

In the procurement of back office services, we consider dollars well spent where they allow SHPS' administrative team to focus on the core academic program and let others operate the day-to-day non-core functions. Again, SHPS' results underscore that. There has been no suggestion SHPS has violated any laws in how it structures its operations and, to be abundantly clear, SHPS has not violated any law in carrying out its management and operations of the schools. Again, the analysis on the value and effectiveness of our structural operations might be different if SHPS results were different, but SHPS stands by its outcomes for students and the resource allocation that is necessary to achieve those results.

SHPS will continue to decide which, if any, non-core functions it will outsource, as many successful charter networks do, because doing so supports SHPS' students-first, results-focused model. However, in light of SCUSD's identified concerns it seems as though the operative question moving forward is whether SHPS will continue to outsource non-core functions with SHA and SHDC and how those relationships will work. As detailed below, our proposal for the future clearly reflects a significant shift to increase public confidence and trust in how we procure back office services. Specifically, on the issue of whether contracting with SHA and SHDC will continue, it is first important for SCUSD to understand the value SHPS receives in working with SHA and SHDC. To fully understand this value received, it is necessary to first address the foundational conflict of interest issues that brings the propriety of these underlying contracting decisions into question.

Cassandra Jennings' Role with SHPS and SHA

As an initial matter, SCUSD's letter did not actually allege any violations of any conflict of laws, fraud, misappropriation, embezzlement, or anything of that kind, but instead, it stated SCUSD has *concerns* related to the *appearance* of a possible conflict of interest related to Cassandra Jennings,

and suggested concerns that SHPS has entered into contracts with SHA and SHDC that might not maximize the use of public education dollars for the benefit of students.

SCUSD seems to allege that Ms. Jennings, in her dual role as SHPS board chairperson and SHA/SHDC CEO has a conflicting financial interest prohibiting her from effectively serving SHPS. However, SCUSD's notice to cure does not cite, nor address, a clearly defined and broadly accepted legal exception that defines Ms. Jennings' financial interest as "remote" and therefore a non-conflict. See Gov. Code Section 1091.

While SHPS understands SCUSD's concern regarding *appearance* – and seeks to address any concern as proposed below – it is important to recognize that Section 1091 authorizes Ms. Jennings' place on the SHPS Board. As a matter of California public policy, Ms. Jennings' salary interest in the nonprofit context is *remote* and does not create a conflict of interest as a matter of law.

While Section 1091 has been a part of law for more than half a century, the last amendments to Section 1091 has reiterated the underlying public policy of California, i.e., "existing policy that an agency's contractual relationship with a nonprofit doesn't result in a conflict of interest." (See California Senate Committee Report on SB 1086 (1/8/2004) [where local voters elected Stanford University's vice provost to the Palo Alto City Council and Standard University is a nonprofit trust, it was deemed prudent for the law to recognize that this does not constitute a conflict of interest for the vice provost where the Palo Alto City Council enters into contracts with Stanford University.]; see Senate Floor Report 1/14/2004 ["Palo Alto and Stanford have more than two dozen contracts, covering everything from traffic control for football games to the installation of dark fiber communications" and the statutory exception language is prudent and consistent with California public policy to "avoid" the need for the councilmember to resign, as explained in the legislative analysis.])

Specifically, Government Code Section 1091(b) provides that "[a]n officer," i.e., a board member of SHPS, shall not be deemed to be interested in a contract entered into by a body or board of which the officer is a member within the meaning of this article if the officer has only a remote interest in the contract and if the fact of that interest is disclosed to the body or board of which the officer is a member and noted in its official records, and thereafter the body or board authorizes, approves, or ratifies the contract in good faith by a vote of its membership sufficient for the purpose without counting the vote or votes of the officer or member with the remote interest." "Remote interest" specifically includes "[t]hat of an officer or employee of a nonprofit entity exempt from taxation pursuant to Section 501(c)(3) of the Internal Revenue Code (26 U.S.C. Sec. 501(c)(3))..."

Ms. Jennings is an officer and employee of SHA, a "nonprofit entity exempt from taxation pursuant to Section 501(c)(3) of the Internal Revenue Code." As the minutes demonstrate, prior to SHPS' approval of any contracts with or involving SHA and SHDC, Ms. Jennings interests as an officer/employee was "disclosed to the ... board ... and noted in its official records, and thereafter the body or board ... approve[d] ... the contract in good faith by a vote of its membership sufficient for the purpose without counting the vote or votes of the officer or member with the remote interest."

It is notable that the California Attorney General issued an opinion in response to a request by an Assemblymember that is entirely on-point in affirming the propriety of Ms. Jennings role with respect to SHPS and SHA. (See CAG Opinion No. 02-403.) Specifically, the Assemblymember asked:

May a city council continue to lease property to a nonprofit corporation under a 40-year lease that will expire in 29 years and grant funds to the corporation if a newly elected council member is the salaried executive director of the corporation?

From this question, the Attorney General concluded that:

A city council may continue to lease property to a nonprofit corporation under a 40-year lease that will expire in 29 years even though a newly elected council member is the salaried executive director of the corporation. The city council may also grant funds to the corporation, provided that the newly elected council member does not participate in the making of the grants and discloses her financial interest in the grants to the city council, and the interest is noted in the council's official records.

While the question related to the lease involved a historical decision that fell outside of Section 1090, the possibility that the city council might approve grants to the nonprofit while the city council remains as a sitting member fell within Section 1090 but was subject to exception under Section 1091. Specifically, the Attorney General explained that:

[S]ubdivision (b)(1) of section 1091 specifies as a "remote interest" the interest a public officer has as "an officer or employee of a nonprofit corporation." Here, the council member's financial interest meets the test of a remote interest as set forth in section 1091, subdivision (b)(1). Accordingly, grants by the city to the nonprofit corporation may be made as long as the city council member follows the disclosure and other requirements of section 1091. (Cf. 65 Ops.Cal.Atty.Gen. 41, 56 (1982).)

As the Attorney General opinion demonstrates, the analysis is simple and straightforward: is the board member an employee/officer of a nonprofit, and has the board member complied with the disclosure/recusal requirements? If so, the interest is deemed remote and not in violation of Section 1090. SHPS specifically solicited legal advice from its outside counsel, Young, Minney & Corr, LLP prior to Ms. Jennings assumed the at-issue role in July of 2022, and SHPS received this analysis from its attorneys regarding Section 1090 and the PRA.

SHPS appreciates and understands SCUSD's concern as an authorizer, and presumes SCUSD is not asking SHPS or Ms. Jennings to forgo the rights of boards and officers to remain on boards that enter into contracts with the board member's nonprofit employer, as provided under Section 1091 – rights the Legislature determined to be appropriate because of the important role nonprofits play in the community, and which involve different considerations than for-profit corporations. We presume SCUSD is not asking SHPS or Ms. Jennings to forgo statutory rights that have inured to city council members and Stanford University provosts as indicated by the Attorney General opinion and legislative history materials, and presumably countless other public officials who have relied upon these determinations – just as SHPS did in seeking legal advice from its counsel,

Young, Minney & Corr. We interpret the SCUSD's request as asking SHPS to take steps to reduce the potential appearance of a conflict of interest notwithstanding what is allowed by the exception.

In addition, we'd be remiss if we did not highlight that Ms. Jennings has served in both roles *since July 2022, for over two years*. Minutes from SHPS BOD Meeting on July 8, 2022. This information is included on SHPS's website as well as the websites of SHA and SHDC. In addition, SHPS is required annually to submit a list of its SHPS Board members to SCUSD. On a monthly basis, SHPS also submits to SCUSD all new SHPS Board meeting agenda and minutes, which have reflected Ms. Jennings' role as SHPS Board Chair and her recusal from SHPS Board discussions and votes involving SHA or SHDC. Similarly, SCUSD has regularly engaged with Ms. Jennings as the Executive Director and responsible contact for facilities services. See Agenda and Notes from October 19, 2023 Site Visit with Amanda Goldman. Prior to this investigation, which was launched one month before SHPS submitted its charter renewal petitions, SCUSD never raised Ms. Jennings' roles as a concern. It was only when this issue was brought to SCUSD by SCTA that a concern was then raised to SHPS by SCUSD.

It is important for SCUSD to recognize that, notwithstanding Ms. Jennings' employment with SHA and role on the Board of SHPS, the cost of SHA's services have gone down over time, not up, since Ms. Jennings has assumed the role of SHPS Board Chair. This demonstrates that Ms. Jennings' role has not precluded SHPS from reducing the contract scope and price, and transitioning services back to SHPS. The result is that SHPS has reduced the fees paid to SHA and SHDC each year since Ms. Jennings has become SHPS Board Chair.

School Year	SHA	SHDC	Total Contract Amount Paid by Year	(Reduction)/Increase from Prior Year	Notes
2021-22	\$ 1,297,104	\$ 514,629	\$ 1,811,733	n/a	
2022-23	\$ 1,321,104	\$ 490,629	\$ 1,811,733	\$ -	
2023-24	\$ 1,121,104	\$ 490,629	\$ 1,611,733	\$ (200,000)	First fiscal year where the contracts were approved while C. Jennings was SHPS Chairperson
2024-25	\$910,000	\$ 585,000	\$ 1,495,000	\$ (116,733)	

Kevin Hiestand's Role as Outside Counsel to SHPS

Kevin Hiestand is a member of the California bar in good standing and has been a member in good standing for over 30 years. The notice to cure does not identify any Rule of Professional Conduct that Mr. Hiestand is alleged to have violated by serving his clients and SHPS is aware of none. Of course, lawyers typically have multiple clients and often those clients do business together – this is ubiquitous in law firms, e.g., law firms that represent school districts and county boards of education, or any law firm that represent private enterprises, e.g., Microsoft. It is only in the event that a potential or actual conflict arises *between* clients that a lawyer may be required to recuse themselves from a particular matter as addressed in the Rules of Professional Conduct.

There is no allegation Mr. Hiestand has ever been in a position where he has had to give advice to SHPS that could have been compromised by his ethical duties to SHA, or that Mr. Hiestand has had any role in influencing any financial decision by SHPS in which he had a financial or personal interest - he has not. Without a financial interest in any decision, without the presentation of any facts that constitute a potential or actual conflict within the meaning of the Rules of Professional Conduct, Section 1090, or the Political Reform Act, it is not possible to prove a negative.

Further, Mr. Hiestand is not SHPS' only counsel. SHPS regularly utilizes Young, Minney & Corr LLP which does not serve as counsel for SHA or SHDC or St. HOPE Endowment. On any matter that could potentially put SHPS interests and SHA's interests in conflict, SHPS would look to Young, Minney & Corr for legal advice, not Mr. Hiestand. There is no rule that precludes Mr. Hiestand from working for SHPS and SHA, separately, where there is no adversarial matter between his clients.

Like Ms. Jennings, Mr. Hiestand has served as legal counsel to SHPS for years. Again, prior to this investigation which was launched one month before SHPS submitted its charter renewal petitions, SCUSD never raised Mr. Hiestand's role as a concern.

SHPS does not have an in-house legal department or SHPS employee serving as legal counsel. Again, this is a non-core function that SHPS chooses to discharge via outsourcing. Apart from the fact that SHPS does not have the ability to manage, train or evaluate a staff member in this role, Mr. Hiestand's modest fee of \$4,000 a month is significantly less than even one full-time staff attorney would cost. SHPS administration and the Board considers Mr. Hiestand's services valuable to SHPS and frankly a bargain. His pricing provides budget certainty, even in months where his services are used extensively, e.g., when at the request of SHPS administration he and SHPS' Human Resources Manager performed an investigation that took more than 40 hours.

It is disappointing that Mr. Hiestand's role with St. HOPE Endowment – a nonprofit – is a point of criticism, particularly when there are no allegations or evidence he has done anything wrong beyond unspecified "concerns." Most importantly, SHPS has no contractual relationship with St. HOPE Endowment. In other words, no public or private funds held by SHPS are paid to the St. HOPE Endowment.

In addition, Mr. Hiestand receives zero compensation from St. HOPE Endowment. St. HOPE Endowment exists solely to support the work of SHA. SHPS has no contractual or legal relationship with St. HOPE Endowment. These are charitable nonprofit public benefit corporations that exist to serve the Oak Park neighborhood of Sacramento. Mr. Hiestand is involved in these organizations because he believes in their mission. In public education, we should be celebrating those who are involved in supporting our communities. We should hold those to account who violate the public trust, but there is nothing beyond unspecified concern here.

The doctrine of incompatible offices under Government Code Sections 1099 and 1126 also do not apply to Mr. Hiestand as outside counsel to SHPS or his role on St. HOPE Endowment - again, a nonprofit organization with not legal or contractual relationship to SHPS. Although Mr. Hiestand is not within the incompatible offices framework, it is notable that Government Code Section 1126

provides that “[s]ervice on an appointed or elected governmental board, commission, committee, or other body **by an attorney** employed by a local agency in a nonelective position shall not, by itself, be deemed to be inconsistent, incompatible, in conflict with, or inimical to the duties of the attorney as an officer or employee of the local agency and shall not result in the automatic vacation of either such office.”

Vague assertions of “concerns” are not fair to the individual and make it challenging for the public to understand and appreciate the facts beyond allegations of “concerns.” Moreover, SHPS perceives it to be inherently unfair for a limit to be imposed on a client’s right to choose legal counsel of their choice. For the reasons set forth above and in the absence of any actual or perceived conflict of interest, SHPS intends to continue its relationship with Mr. Hiestand.

Going Forward – SHPS’ Action Plan

1. Cassandra Jennings’ Role

As SHPS has outlined above, Ms. Jennings is legally authorized to serve on SHPS’ Board under Section 1091, notwithstanding her role with SHA. SHPS confirmed this fact by requesting advice and counsel from outside legal counsel prior to Ms. Jennings’ appointment as SHPS Board Chairperson over two years ago. Ms. Jennings has properly recused herself from all SHPS Board discussions and votes relative to SHA and SHDC. Ms. Jennings has an impeccable history of public and community service. No allegations have been made, nor could they be made, that Ms. Jennings put her personal interests or those of SHA/SHDC ahead of the students of SHPS. At no time prior to the eve of charter renewal has SCUSD identified Ms. Jennings’ dual role as a cause for concern and/or actual or potential conflict.

However, it has been made clear to SHPS that renewal of its charters for PS7 and Sac High may now be in jeopardy after twenty years of operation due to the fact Ms. Jennings serves as both the CEO of SHA/SHDC as well as the Chairperson of the SHPS Board of Directors. Neither Ms. Jennings nor SHPS will allow SCUSD’s concern relative to Ms. Jennings’ positions to in any way negatively impact the requested charter renewals. In only two years, Ms. Jennings has contributed an incredible amount to SHPS. It is with great sadness, but with appreciation for her service, that SHPS shares that Ms. Jennings steps down from SHPS’ Board effective September 30, 2024 and after SCUSD approves the pending SHPS charter renewals. See Cassandra H.B. Jennings’ letter of resignation from the Board of Directors of SHPS dated August 23, 2024. The next regular meeting of the SHPS Board of Directors is September 12, 2024, at which time the Board will appoint a new Chairperson and plan appropriately for the transition.

2. Amendment of SHPS’ Bylaws

In further demonstration of SHPS’ commitment to avoiding the appearance of any conflicts of interest on a going-forward basis, at SHPS’ next regular meeting, SHPS’ BOD will hear an action item to amend its bylaws to confirm that officers, directors, and employees of any entities that are contracted with or propose to contract with SHPS shall be ineligible to serve on SHPS’ Board as a board member. Specifically, the amended language provides that:

No individual may be appointed to serve as a Director of the Board or continue as a Director of the Board if they are an officer, director, and/or employee of any entity that is contracted

with SHPS, or was contracted with SHPS in the prior twelve (12) months, or proposes to contract with SHPS. Any member of the Board in violation of this paragraph shall be considered disqualified to serve as a Director and shall be subject to removal consistent with these Bylaws.

As part of the proposed amendment, SHPS will delete any provisions in its bylaws to the extent they conflict with the above prohibition. (See Proposed Redline Amendments to SHPS Bylaws) at its next regular board meeting, which is scheduled for September 12, 2024.

3. Kevin Hiestand's Role

As addressed above, Mr. Hiestand does not work on any matters for SHPS in which he has a potential or actual conflict. For the reasons set forth above and in the absence of any actual or perceived conflict of interest, SHPS intends to continue its relationship with Mr. Hiestand.

Further, SHPS will ensure that any legal matters involving SHA, SHDC or the St. HOPE Endowment are addressed by outside legal counsel and not by Kevin Heistand. SHPS' Superintendent shall be responsible for directing legal services accordingly.

Further, SHPS will require Mr. Hiestand to provide sufficiently detailed monthly invoices to provide accountability, through recordkeeping, that Mr. Hiestand's legal work does not involve any matters that potentially put SHPS adverse to SHA or SHDC.

Further, SHPS has received the enclosed memorandum and assurances from Mr. Hiestand affirming his lack of potential or actual conflicts relative to SHPS. (See Attachment Memorandum and Assurances from Kevin Hiestand.)

If SCUSD's position is that it will not consider SHPS to have cured the SCUSD's concerns unless SHPS terminates its relationship with its lawyer, Mr. Hiestand, please let us know as soon as possible that there is no other option so SHPS may proceed accordingly before the SCUSD posts its findings.

4. Amended LCAP To Include Increased Specificity

The Christy White report suggests that programs operated by SHA related to student involvement in the community might not be appropriate because they are not reflected in the LCAP and/or that they "are not related to a public education purpose." (L. Allen letter to L. Ruda dated July 26, 2024, p. 8.) There is of course no law that provides, nor is there any law cited, that a charter school may engage in expenditures only to the extent that the expenditure is addressed in the LCAP, or that expenditures are not justified unless addressed in the LCAP. At SHPS, the services that SHA provide are foundational schoolwide programs and therefore have not been viewed as necessitating a specific LCAP line-item tracking to a particular state priority or student outcome.

However, to demonstrate SHPS's willingness to address SCUSD's concerns, the SHPS Executive Committee of the Board of Directors authorized SHPS to amend the 2024-25 LCAP at its regular meeting which was held on August 13, 2024. Executive Committee Agenda and Minutes, August

13, 2024, Item III, B. In an effort to further show its willingness to continue to work with SCUSD and address the concerns expressed in Superintendent Allen's letter, SHPS has amended the 2024-25 LCAP to reflect SCUSD's concerns. L. Allen letter to L. Ruda dated July 26, 2024, p. 8. The amended LCAP is now posted on SHPS's website (<https://www.sthopepublicschools.org/our-district/key-documents-policies/>) and enclosed with this response. (See Attachments or linked documents at pp. 16, 18, 19).

Again, SHPS wants to underscore that the Secretary of Education in November 2022 specifically encouraged school districts to engage community organizations to provide these student experiences after the COVID-19 pandemic: As noted by the Secretary,

“[T]he pandemic reduced the availability of work-based learning. These impacts have been more pronounced in certain industries, particularly those that have traditionally engaged a youth workforce, in addition to industries that support earn-and-learn educational models like Registered Apprenticeship. Work-based learning is a proven strategy that reinforces academic instruction by giving students opportunities to apply knowledge and skills in real-world situations. Work-based learning also helps young people to generate income, establish future earning potential, and connect with professionals in the labor market. The US Department of Education has encouraged school districts to support new skill-building experiences like internships, cooperative education, pre-apprenticeships, and registered apprenticeship programs that are integrated within school-day instruction and other extended learning models that occur after school or over the summer months.”

Any claim that using public funds to offer these student based work experiences or contracting with an organization to provide the same, is “not related to a public education purpose,” is simply incorrect. St. HOPE Public Schools is rooted in our five pillars, one of which is the “power to lead” and, as a result, we strongly believe that community service helps our scholars develop a strong sense of civic responsibility and establish the foundation for a lifetime of meaningful community involvement. Over the course of their time at Sac High, scholars are expected to complete 110 hours of community service. Each year, students must complete a set number of hours. By their junior and senior years, Sac High scholars must annually complete 40 hours of community service.

Consistent with the Secretary's direction, SHPS has worked to expose our scholars to various hands-on learning experiences outside the classroom. For 2024-25 we have contracted with SHA to assist SHPS and our scholars to secure experiences to meet their community service requirements as well as to expose them to work-based opportunities. This has ranged from assisting our teachers over spring break with our PS7 Elementary move and construction project (e.g. assembling student desks, packing and unpacking new curriculum) and supporting staff with our Dragon's Closet which provides our at-risk scholars and their families with free school supplies, clothes, food, toiletries, cleaning products, and other household goods.

5. Issue Public RFP for Back-Office Services

As addressed in SHPS' response to the concerns raised in Section II (A) *Non-GAAP Accounting Practices*, SHPS has committed to launch a competitive bidding request for proposal process (“RFP”) that will seek proposals for back-office services currently provided by SHA. As part of that response, SHPS committed to implement a number of safeguards and controls to address some

of the conflict of interest concerns outlined in Section III (C) *Potential Conflict(s) of Interest Under Government Code Section 1090 and Political Reform Act of 1974 (Governance Code Section 1000 et seq)*. SHPS believes the RFP process, and controls included in it, further address SCUSD's concerns in conjunction with the other actions outlined above in this section, and specifically, in response to SCUSD's concern regarding alleged "fiscal dependence of SHA/SHDC [and] the ability of SHPS to make objective and market-based decisions regarding an array of essential services critical to the operation of a charter school." (L. Allen letter to L. Ruda dated July 26, 2024, p. 9.)

With respect to contracting with SHDC in particular, we appreciate that SCUSD's Notice recognized that where "SHDC has contracted to provide facilities management and information technology at a cost of \$575,000" that "[n]either of these amounts seems unreasonable based on the scope of work delineated in the agreements – assuming such services are provided in a manner consistent with such scope." (L. Allen letter to L. Ruda dated July 26, 2024, p. 9.) SHPS confirms that SHDC provides facilities management and information technology services commensurate with the contracted scope, and SHDC is being required by SHPS to provide detailed monthly invoicing as of the 2024-25 school year that provides time accounting to identify the services rendered in consideration of the fees charged. In addition, SHPS' steps to measure and assess SHDC's performance relative to information technology are already underway for 2024-25 and these results will impact how SHPS moves forward. Work relative to facilities changed significantly when SCUSD made the decision to change the facilities support it is providing to independent charter schools, like Sac High and PS7, and moved the full-time staff assigned to SHPS schools. With the ongoing construction and implementation of new plans to fill the void now that the SCUSD staff has been removed, SHPS will have better information upon which to determine next steps with SHDC after the current school year.

Based on the results and lessons learned from structuring and implementing the RFP process in the 2024-25 school year for back-office services currently performed by SHA (again, see Action Plan #1), SHPS will develop and implement a strategy and amend policies as needed during the 2025-26 school year governing RFP processes for vendors more broadly going forward, e.g., vendor contracts for specified service areas based on a reasonable threshold set by the Board, such as vendor contracts in excess of \$200,000.

Appendix

Table 1

	Sac High	PS7	SCUSD
ELA (DFS) – African American	-14.2	-62.7	-91.9
Math (DFS)– African American	-130.1	-115.9	-132
%Prepared for College/Career (Dashboard) – African- American	42.9%	N/A	12.6%
A-G Completion Among HS Graduates – African-American	100% as of 22-23 100% as of 23-24	N/A	30% as of 22-23
College-Going Rate – African American	75% as of 21-22	N/A	53.2% as of 21-22

Table 2

	% Socioeconomically Disadvantaged	%Black/African American + Hispanic/Latino
Sac High	74.9%	85%
PS7	86.5%	83.7%
Sutter High	30.9%	30.1%
Santa Ynez Valley Union High	31.3%	48.8%
Lassen High	40.4%	25.3%
Upper Lake USD	84.4%	33.4%
Modoc JUSD	65.4%	21.2%

Sacramento City Unified School District



Staff Renewal Report

Published September 4, 2024

Sacramento Charter High School



Requested Term: July 1, 2025 - June 30, 2030

On June 28, 2024, Sacramento Charter High School (SCHS) submitted a petition to renew its charter to the Sacramento City Unified School District (District). If approved, the SCHS would receive a five-year charter term for the period from July 1, 2025, through June 30, 2030.

In compliance with Education Code 47605(b), the District's Board of Education held a public hearing on August 8, 2024, to consider the level of support for the petition by District teachers, other District employees, and parents/guardians. The Board will conduct a second public hearing and render its decision on the renewal petition on September 19, 2024. This *Staff Report*, including findings of fact, was published on the District's website and shared with SCHS on September 4, 2024, which was at least fifteen (15) days prior to the public hearing during which the Board will take action on the renewal petition.

Color coding has been used to direct the reader's attention to the most salient elements of the report.

Meets all expectations and/or standards; supports the case for renewal

Substantially meets expectations and/or standards; worthy of note but does not indicate a serious issue that would likely inhibit renewal

May not meet expectations and/or standards; should be considered carefully as a potential non-renewal issue

Criteria For Renewal

Education Code (EC) sections 47605 and 47607 guide the District, as the charter authorizer, in reviewing petitions for the renewal of charter schools. As part of that review, the District is also required to consider the schoolwide performance, and performance of all student groups, on state and local indicators with a greater weight applied to measurements of academic performance (EC 47607(b)(1)).

Petition Elements

Charter renewals are governed by the standards and criteria described in EC sections 47607(b) and 47605. These shall include, but not be limited to, a reasonably comprehensive description of

any new requirement for charter schools enacted into law after the charter was originally granted or last renewed.

Performance Levels

Based upon a charter school's performance on the California School Dashboard, academic achievement indicators (CAASPP ELA and math); English Language Proficiency Indicator (ELPI), and the College Career Indicator (CCI) in the two consecutive years immediately preceding the renewal decision, the California Department of Education (CDE) places a charter school in one of the three performance categories: high, middle, or low. For those designated as high or middle-performing, the charter school is presumed to be renewed unless one or more denial criteria are met. More specifically, high-performing charter schools may be renewed for five to seven years, and middle-performing charter schools may be renewed for five years.

For low-performing charter schools, there is a presumption that their renewal petition will be denied. However, such charter schools may receive a maximum two-year renewal based upon a "second look." As part of this "second look," the authorizer conducts a deeper evaluation of the charter school's academic achievement and may renew a charter that meets the following criteria:

1. The charter school is taking meaningful steps to address the underlying cause or causes of its low performance, and those steps are, or will be, reflected in a written plan adopted by the charter school's governing body.
2. There is clear and convincing evidence showing either of the following:
 1. The school achieved measurable increases in academic achievement, as defined by at least one year's progress for each year in school.
 2. Strong postsecondary outcomes, as defined by college enrollment, persistence, and completion rates equal to those of similar peers.
 3. Growth shall be demonstrated by verified data.

Reasons for Denial

The authorizer may deny the renewal of a charter if it makes written factual findings that the charter school failed to meet the standards set forth in EC section 47605:

1. The charter school will provide an unsound educational program for students during the term of its charter;
2. The charter school is demonstrably unlikely to successfully implement the program set forth in the petition;
3. The petition does not contain the necessary affirmations and assurances;
4. The petition does not contain reasonably comprehensive descriptions of the fifteen required elements set forth in the Charter Schools Act.

5. The petition does not declare whether the charter school shall be deemed the exclusive public employer of the charter school's employees for purposes of Chapter 10.7 (commencing with Section 3540) of Division 4 of Title 1 of the Government Code.

Notwithstanding EC sections 47607(c), 47607.2(a), and 47607.2(b), pursuant to 47607(e), the board may also deny renewal of any charter school upon a finding that:

6. The charter school is demonstrably unlikely to successfully implement the program set forth in the petition due to substantial fiscal or governance factors; or
7. The charter school is not serving the pupils who wish to attend, as documented by EC 47607(d).

Further, the authorizer must provide 30 days' notice with a reasonable opportunity to cure the violation(s) and make a finding that either:

- The corrective action proposed by the charter school has been unsuccessful; or
- The violations are sufficiently severe and pervasive as to render a corrective action unviable

Consideration of Material Revisions

Sacramento City Unified Board Policy 0420.41 on Charter Oversight defines material revisions as proposed changes in charter operations that represent a substantial difference to the charter, including:

- Expansion of education services to include service of additional grade levels
- Expansion of facilities to additional sites
- Fundamental changes to instructional or pedagogical model

In review of the submitted renewal petition for PS7, District staff identified a potentially substantive change, which is detailed below. However, staff has determined that these changes do not require a material revision to the charter requiring separate board approval.

Description of Change	Page #	Material Revision?
Creation/renaming of the position of Superintendent.	multiple	No. Title may impact what is considered comparable compensation but can be appropriately accounted for in the budget.

Executive Summary

Performance Level assigned by CDE (High, Middle, Low)	MIDDLE
Has a notice to cure an alleged violation been issued?	YES
→ If notice was issued, has a response been submitted?	YES

Did the charter petition meet all primary requirements for renewal?		YES
1	Does this charter present an <u>unsound</u> educational program?	NO
2	Are the petitioners demonstrably <u>unlikely</u> to successfully implement the program set forth in the petition?	SEE ANALYSIS
3	Does the petition contain the necessary affirmations and assurances of the Charter Schools Act?	YES
4	Does the petition contain reasonably comprehensive descriptions of all of the 15 elements described below?	YES
5	Does the petition contain a declaration of whether the charter school shall be deemed the exclusive public employer of the charter school's employees?	YES
Were there any findings that would potentially trigger a notice to cure an alleged violation under either of the following?		YES
6	Is the charter school demonstrably <u>unlikely</u> to successfully implement the program set forth in the petition due to substantial fiscal or governance factors?	SEE ANALYSIS
7	Does the charter school serve the pupils who wish to attend, as documented by E.C. section 47607(d)?	YES

Review of Elements

REQUIRED ELEMENTS OF THE PETITION			
ELEMENT	TOPIC	MEETS STANDARD	KEY FINDING(S)
Element 1/A	Educational Program	YES	See note below
Element 2/B	Measurable Student Outcomes	YES	
Element 3/C	Student Progress Measurement	YES	
Element 4/D	Governance	YES	With action plan
Element 5/E	Employee Qualifications	YES	With action plan
Element 6/F	Health and Safety	YES	See Note: Safety Plan
Element 7/G	Racial/ Ethnic Balance	YES	
Element 8/H	Admissions	YES	
Element 9/I	Independent Audits	YES	With action plan
Element 10/J	Suspension/Expulsion	YES	See note below
Element 11/K	STRS	YES	
Element 12/L	Attendance Alternatives	YES	
Element 13/M	Post-Employment Rights	YES	
Element 14/N	Dispute Resolution	YES	
Element 15/O	Closure Procedures	YES	
REQUIRED SUPPLEMENTAL INFORMATION		MEETS STANDARDS	KEY FINDING(S)
Financial/ Administrative Plan		YES	
Facilities		YES	
Impact Statement		YES	
Special Education		YES	

**Completed Review Matrix Attached*

Detailed Findings of Fact

This section contains greater detail of any abovementioned area that did not meet requirements.
Items not described met requirements.

1. Does this charter present an unsound educational program? **NO**

SCHS has served students in grades 9-12 in the Oak Park community since 2003. The program's overarching goal is to, in collaboration with its partners at Public School 7 (PS7) and St. HOPE Public Schools (SHPS), offer an education pipeline from elementary school to college. SCHS serves a historically underserved community and, for many years, has had notably strong academic and post-secondary outcomes, particularly for African American and socio-economically disadvantaged (SED) student groups.

SCHS describes its educational approach as focused on developing a strong commitment to academic achievement and work ethic. Its program includes a commitment to rigorous academic standards, character development, college preparation, and extended learning time. SCHS operates a full-inclusion special education program supported by the El Dorado Charter SELPA.

Overall, the design and description of the educational program at SCHS are sound and meet renewal criteria. However, triangulating among the educational program described in the petition, observations made during charter oversight in the 2023-24 school year, and available public data, it is clear that there are some gaps between the program as described and the implementation. This is a normal phenomenon, the acknowledgment of which should not detract from past successes but rather should be addressed in the spirit of ongoing, continuous improvement. These items are discussed in the section below.

2. Are the petitioners demonstrably unlikely to successfully implement the program set forth in the petition? **NOT WITH ACTION PLAN / CONDITIONS**

Academics

Overall, the design and description of the educational program at SCHS are sound and meet renewal criteria. SCHS has demonstrated educational outcomes that prepare students for their post-secondary ventures. As reflected on the California School Dashboard, between 2017 and 2023, the graduation rate for African American students consistently exceeded the rate for the African American student group statewide. For most years, the graduation rate for students in the SED student group has exceeded the rate for the SED student group statewide. Except for 2019, the schoolwide graduation rate at SCHS has exceeded the state graduation rate. As indicated in the petition, graduation requirements at SCHS align with UC/CSU entrance requirements.

The California School Dashboard shows that for grade 11, student scores on the California Assessment of Student Performance and Progress (CAASPP) in English-Language Arts exceeded the state, except for the test administration in 2018. Mathematics outcomes, however, were generally below statewide averages. SCHS's academic performance has experienced swings during its charter term. In 2018, there was a decline of more than 36 points in English-Language Arts and Mathematics. In 2019, there were increases of greater than 44 points in both English-Language Arts and Mathematics. For the 2023 test administration, there were declines of greater than 49 points in both English-Language Arts and Math. While some of these swings may be attributed to year-to-year variation in a small testing population, they are worthy of examination and reflection. They were not addressed in the submitted petition.

The reported data on the rate of students graduating with UC/CSU A-G eligibility is similarly worthy of examination and reflection. SCHS indicates that in 2020 and 2021, 100% of graduates met UC/CSU A-G requirements, and just under 80% of students attended college. This is consistent with data reported in Dataquest. The California School Dashboard's reported four-year cohort graduation rate for SCHS has consistently been between 80-90% since 2018. According to the California School Dashboard (Additional Reports), in 2023, the percentage of students who met UC/CSU requirements in the four-year graduation rate was 86%.

An 86% rate of students meeting UC/CSU requirements is worthy of celebration (surpassing both district and county). It also provides an opportunity to reflect on the remaining 14% of students. SCHS's graduation requirements are aligned A-G eligibility, which might mean that if a student is not meeting A-G eligibility, they do not graduate. SCHS did not provide information regarding the cohort retention rate or how it addresses students nearing graduation who are not on track to complete A-G-eligible coursework.

In addition, suspension rates based on the California Dashboard have significantly increased beyond District and state levels since 2017. In 2023, the suspension rate was 16% school-wide, 18.5% for African American students, and 23.0% for students with disabilities. While this data was acknowledged in the petition, there was limited to no discussion on how SCHS planned to meaningfully address and improve upon those rates.

The review team noted that there may be a correlation between the 2023 SCHS outcomes, the generally high suspension rates, and a significant increase in what the state calls "ineffective" teachers. During the 2022-23 school year, the percentage of SCHS teachers defined as "ineffective" increased significantly from the prior year—from 14% to 63%. During the 2023-24 school year, SCHS's percentage of teachers deemed "ineffective" decreased significantly from 63% to 31.6%.

Concerns about teacher credentialing were identified in the Notice of Alleged Fiscal and Governance Violations (Notice to Cure) issued to SHPS, as the charter operator of SCHS, after SCHS submitted its renewal petition. In its corrective action plan, SHPS indicated several steps that it had taken or was prepared to take to address this issue. These are described in the response to the Notice to Cure in the subsequent section

Based on the review of items submitted with the petition, in conjunction with the identified corrective action plan, SCHS seems likely to succeed with the implementation of its education program. District staff encourages SCHS to consider engaging in a deep reflection on its strategic plan regarding suspension, especially for students with disabilities, in the coming years. In addition, District staff encourage SHPS to share contextual data (e.g., four-year graduation rate, cohort retention rate, graduate persistence in college) when sharing UC/CSU A-G completion rates for its students.

Fiscal

To understand SCHS's ability to manage the fiscal resources necessary to implement its charter school program, the review team analyzed financial statements submitted through oversight in the 2023-24 school year (i.e., adopted budget, unaudited actuals, first interim report, second interim report, audit report) and multi-year and cash flow projections submitted with the renewal petition.

Based on the available materials, the review team made the following observations:

1. **Assumptions:** Submitted financial statements do not include detailed assumptions for enrollment, ADA, FTE, etc. An assumptions list often includes, but is not limited to, assumptions for COLA, grants, one-time grants, health and welfare, and any other major factors that would impact the MYFP. The lack of assumptions does not allow for a proper evaluation of the validity of the cash flow projections submitted by the charter.
2. **Enrollment:** No enrollment assumptions were provided regarding financials. Enrollment declined during the term of the most recent charter.
3. **ADA:** ADA assumptions were not provided.
4. **Cash:** The Cash Flow projections indicate sufficient cash availability, with a projected balance of \$1.9M in June 2026. However, the lack of provided assumptions prevents a thorough assessment of the projections' reasonableness.
5. **Interim Review:** The financial analysis template (completed through district oversight in 2023-24) demonstrated that the charter was not making the appropriate periodic revisions required at every financial reporting period. The lack of adjustments at every period can be an indicator of a lack of budget monitoring, which in turn can lead to surprises, larger deficits, and even

insolvency. These items will likely be addressed with the corrective action steps described below.

6. **Deficit Spending:** The financial analysis template showed no deficit spending in 2023-24.
7. **MYFP:** The MYFP did not align with the Cash Flow Statement. The total revenues and expenditures outlined in the cash flow did not match those in the MYFP. Federal Revenues, for example, were materially different when comparing the MYFP with the Cash Flow statement. In fiscal year 2024-2025, total revenues for the MYFP were identified at \$8.1M. The Cash Flow statement projected \$8.8M in total revenues. This is a large unexplained variance, especially taking into consideration the ending net assets of \$ 922K identified in the MYFP. The MYFP lacked supporting documentation, aside from single-line notes within the document.
8. **Ending Fund Balance:** The ending fund balance is healthy at about 2.9M. However, without the MYFP combined with a reasonable assumption list, it is unclear if the balance will be maintained in future years. Based on the cash flow statement provided, it seems that the reserve will drop to \$1.9M by June 2026.

The Notice to Cure issued to SHPS after it submitted the renewal petition for SCHS identified a lack of generally accepted accounting principles and repeated audit reports listing material weaknesses in internal controls. In its corrective action plan, SHPS indicated several steps that it had taken or was prepared to take to address this issue. Those are described in the response to the Notice to Cure in the subsequent section.

In general, the fiscal review team noted that they had expected to see additional documentation included with the submission. In their experience, typically, the charter school would provide their FCMAT LCFF Calculator and a narrative statement explaining the projections in the MYFP, including details on revenue and expenditures, and account for significant variances between years. This narrative should also include key information such as ADA assumptions, Unduplicated Count assumptions, special education assumptions, etc. Without these sources of information, the review team felt challenged to speak definitively about all aspects of SHPS's fiscal program. *However, the steps identified in the corrective action plan are likely to resolve any questions or issues.*

Based on the materials reviewed, staff feel that SHPS is not demonstrably unlikely to successfully implement the program based on fiscal considerations. The steps described in the corrective action plan do support the likelihood of successful implementation. Staff would like the opportunity to review a complete packet of fiscal documentation, perhaps as a condition of renewal or a component of ongoing oversight.

Governance

The review team analyzed several governance items submitted with the renewal petition and regular oversight including board bylaws, qualifications, meeting minutes, and agendas. While the review team noted a few areas that may need to be updated, there were no major concerns.

The Notice to Cure issued to SHPS noted a potential conflict of interest. In its corrective action plan, SHPS indicated several steps that it had taken or was prepared to take to address this issue. Those are described in the response to the Notice to Cure in the subsequent section.

Based on the review of items submitted with the renewal petition in conjunction with the identified action plan, SCHS seems likely to succeed with effective and legal charter school governance.

3. **Does the petition contain the necessary affirmations and assurances of the Charter Schools Act?** YES
4. **Does the petition contain reasonably comprehensive descriptions of all the 15 elements?** YES

Element 4/D: YES

The review team noted that the copy of the updated bylaws in the appendix to the renewal petition was not signed or dated. Therefore, the District will require an executed version. In addition, the review team found that the SHPS board's composition does not include any representation specific to SCHS, which the District does not consider a best practice as it may call into question the ability of the board to focus on the individual needs of each charter school. Other governance elements were addressed in the corrective action plan and are described below.

Element 5/E: YES

As noted above, concerns about teacher credentials/qualifications were identified in the Notice to Cure issued to SHPS after SCHS submitted its renewal petition. The review of the petition did include all of the necessary elements affirming that teachers will hold appropriate credentials, as well as optional elements regarding staff recruitment and development. The corrective action plan submitted by SHPS includes several additional steps that appear to bridge the gap between the language in the renewal petition and implementation. The combination of these steps meets the requirements of this element.

Element 6/F: **YES**

The review team noted that the safety plan is generic to the SHPS organization as a whole and does not detail issues specific to a high school campus culture. This is not a best practice in light of the number of state and local emergencies schools have encountered in recent years. The District expects that SCHS or SHPS will carefully review the contents of its safety plan to ensure that it not only meets the requirements of the law but also is prepared in a manner that is tailored to the high school student population.

Element 9/I: **YES**

As noted above, a lack of generally accepted accounting principles and repeated audit reports listing material weaknesses in internal controls were identified in the Notice to Cure. The review of the renewal petition did reflect that it included all of the necessary elements describing how audits would be conducted, assurance of generally accepted accounting principles, and the timing of how audit findings/exceptions were to be addressed. The corrective action plan includes several additional steps that appear to bridge the gap between the language in the petition and implementation. The combination of these steps meets the requirements of this element.

Element 10/J: **YES**

The renewal petition's language is comprehensive. However, as seen in the additional data below, the suspension rate is high, particularly for some subgroups. This may point to a gap between SCHS's discipline policies and the implementation or the need to reexamine such policies.

5. Does the petition contain a declaration of whether the charter school shall be deemed the exclusive public employer of the charter school employees? **YES**

Special Note: While the renewal petition does appear to reflect new laws adopted since the original charter was approved, the renewal petition does not call out or identify those new requirements. The District recommends that these be detailed in an executive summary

Response to Notice to Cure

Based on concerns highlighted in the 2023-24 school year, SCUSD issued a Notice to Cure to SHPS, as the operator of SCHS, on July 26, 2024. SHPS provided a corrective action plan on August 26, 2024, as requested. The Notice to Cure identified three areas of concern. Below is a summary (not inclusive of all details) of SHPS's response to all three areas and the District staff's corresponding analysis.

Concern 1: Lack of Generally Accepted Accounting Practices (GAAP)

Action 1: SHPS's back office provider, St. Hope Academy (SHA), will immediately retain additional staff to ensure GAAP practices are in effect.

Action 2: SHPS will retain an audit firm to review concerns raised by the District and verify that SHA has made appropriate changes and is implementing GAAP practices.

Action 3: SHPS will require SHA to provide detailed monthly invoices for provided services.

Action 4: SHPS will issue a request for proposals and implement an open selection process for back-office service providers.

District Staff Analysis of Response to Concern 1: The steps described in the action plan are a reasonable response to the concerns/alleged violations. Working with the audit firm and additional staff strengthens the capacity of both SHPS and SHA to administer public funds and allows for greater transparency and accountability in fiscal reporting. Whether SHA or another entity ultimately takes on the back-office responsibilities, the detailed invoices, request for proposals process, and improved accounting practices establish a stronger foundation for the use of public funds to directly serve the students of SCHS.

Should the District's Board vote to renew SCHS's charter, District staff will have the capacity to support the above action steps in the following way:

District Action 1: Review key financial submissions (i.e., adopted budget, unaudited actuals, first interim financial report, second interim financial report) each year and provide a summary of that review (at minimum) in the annual report as part of regular oversight.

District Action 2: Meet with or send feedback to SHPS staff following a review of each key fiscal submission (adopted budget, unaudited actuals, first interim, second interim) to address any concerns or confusion.

District Action 3: Set a timetable with defined metrics addressing when each step in this process is expected to be completed and by what criteria the District will deem it complete.

Concern 2: Teacher Qualifications/Credentials

Action 1: In its corrective action plan, SHPS commits to continuing to verify teacher credentials as part of hiring, minimizing the use of emergency credentials, implementing

and monitoring credential agreements, and submitting supporting documentation to the California Commission on Teacher Credentialing (CTC).

Action 2: In the last two years, SHPS has re-established its internal human resources department and added staff to support it. The action plan indicates that SHPS is committed to continuing this effort.

Action 3: SHPS indicated that it has increased base salaries to, in part, increase teacher retention. The action plan indicates that SHPS is committed to continuing this effort.

Action 4: SHPS is committed to working with teachers and SCTA to identify ways to further support teachers who need to secure preliminary or clear credentials.

Action 5: SHPS has embarked on a two-year curriculum adoption cycle, already having purchased the curriculum for the 2024-25 school year. Maintaining this resource for teachers could support both retention efforts and bridge the gap where there may still be fewer qualified teachers. In the corrective action plan, SHPS is committed to continuing this effort.

District Staff Analysis of Response to Concern 2: SHPS's response to this concern contained considerable background and context. In addition, it is worth noting that in recent years, California has seen unprecedented levels of teachers leaving the profession, lengthy backlogs on credential processing, and impacted teacher education programs. The questions of how to recruit and retain qualified teachers are not unique to SHPS. As such, the steps noted in Actions 2-5 above appear promising. The steps described in Action 1 seem to be clear extensions of the language in SCHS's renewal petition and are consistent with best practices.

Notwithstanding the above, District staff has two remaining concerns in this area. First, the District does not have a strong mechanism to assess teacher credential status in real-time (most state reporting delays are almost a year). This should not be held against SHPS but rather reflects a challenge in supporting the corrective action. Second, even with these plans in place, there are still some under-qualified individuals serving SHPS students. In the corrective action plan and other areas, SHPS has described how it generally supports those individuals in their professional growth (e.g., partnership with Teach for America, and professional development opportunities). District staff would like to see that described more specifically as it pertains to how SHPS prepares new or under-qualified educators to implement the educational program described in the charter.

Should the Board vote to approve SCHS's renewal petition, District staff will have the capacity to support the above action steps in the following way:

District Action 1: Collaborate with SCUSD credential staff, SHPS representatives, and possibly representatives from other charters to develop an ongoing, sustainable, and timely model for reviewing charter school teacher credentials.

District Action 2: If needed, support SHPS in adding detail to its professional development plans to better support newer and underqualified teachers. If support is not needed or desired, District staff can review and provide feedback on professional development plans.

District Action 3: Set a timetable with detailed metrics addressing when each step in this process will be completed and by what criteria the District will deem it complete.

Concern 3: Governance and Conflict of Interest

Action 1: Cassandra Jennings will resign from the SHPS Board effective September 30, 2024, if the renewal petitions for PS7 and SCHS are approved.

Action 2: The SHPS Board will amend its bylaws to preclude any officer, director, or employee of a vendor from serving on the SHPS Board.

Action 3: SHPS will ensure that outside legal counsel addresses legal matters as directed by the Superintendent.

Action 4: SHPS will issue a request for proposals and implement an open selection process for back-office service providers

Action 5: SCHS has amended its 2024-25 local control and accountability plan (LCAP) to reflect the relationship between the SHA contract and student outcomes.

District Staff Analysis of Response to Concern 3: One of the main duties of a charter school's board is to ensure the fiscal sustainability and legal compliance of the school. Action items 2-4 seem like positive steps toward that goal. Action item 1 addresses issues where there may have been an appearance of a conflict of interest. Action item 5 addresses transparent alignment between the budget and education program. This last item has significance as the LCAP is described in the renewal petition as the mechanism for establishing and updating the charter school's goals. It also is the metric by which all local educational agencies in California are asked to account for how they spend public dollars.

Should the Board vote to approve SCHS's renewal petition, District staff will have the capacity to support the above action steps in the following ways:

District Action 1: Review key governance submissions (i.e., board calendar, qualifications, training) each year and provide a summary of that review at minimum in the annual report as part of regular oversight.

District Action 2: Review the charter LCAP each year for legal compliance and transparent alignment with goals/educational programs. Staff will provide a summary of that review, at a minimum, in the annual report as part of regular oversight.

District Action 3: Set a timetable with detailed metrics addressing when each step in this process is expected to be completed and by what criteria the District will deem it complete.

Summary of Available Data

The data below is from the California State Dashboard (Dashboard) for the years 2017-2023. Data from 2024 (i.e., the final year of the charter term) was not publicly available at the time of this report. The Education Code does not expressly require PS7 to share local data from 2024 but may choose to do so to present a more complete picture of student progress in the final year of the charter term.

Performance Level Determination

To determine a charter school's performance level for purposes of renewal, CDE reviews the status and color of Dashboard indicators. The charter school is compared to the state for the two years prior to renewal (i.e., 2022 and 2023). *Importantly, the state does not consider student groups that outperform the state when determining renewal levels, which in these years included the following: White, Two or More Races, Asian, and Filipino.*

CDE uses two criteria for the placement of charter schools in a particular performance level. Criterion 1 reviews the color of all school-wide academic indicators on the Dashboard for the two years preceding renewal. Charter schools assigned blue or green for all indicators are placed in the high-performing level. Charter schools assigned red or orange for all indicators are placed in the low-performing level. SCHS students were in the medium (yellow) for Graduation Rate and high (green) for English Language Arts in 2022. As such, **neither high nor low category applied to SCHS, placing them on track for the Middle Level.**

English Language Arts

Groups	Charter 2022	Charter 2023
All Students	High	Orange
African American	High	Orange
SED	High	Orange

Math

Groups	Charter 2022	Charter 2023
All Students	Low	Red
African American	Low	Red
SED	Low	Red

English Learner Progress (ELPI)

All English Learners	No Performance Color	No Performance Color
----------------------	----------------------	----------------------

College and Career Indicator (9-12)

Groups	Charter 2022	Charter 2023
All Students	Not Calculated Statewide	Medium
African American	Not Calculated Statewide	Medium
Student w/ Disabilities	Not Calculated Statewide	Medium

Graduation Rate (9-12)

Groups	Charter 2022	Charter 2023
All Students	Medium	Orange
African American	Medium	Orange
Student w/ Disabilities	Medium	Orange

Suspension Rate

Groups	Charter 2022	Charter 2023
All Students	Medium	Red
SED	Medium	Red
Hispanic	Medium	Red
Student w/ Disabilities	High	Red
African American	Medium	Red

Using Criterion 2, CDE reviews SCHS's Dashboard status for the academic indicators for all students and eligible student groups. SCHS is placed in the middle-performing level under this criterion, as all student groups outperformed the state in 2022 in all four academic metrics and in 2023 for two metrics. In 2022 and 2023, SCHS had two eligible student groups for CAASPP and three for other indicators. There was not a statistically significant number of students in the English Learner group to generate a performance level.

*English Language Arts, Distance from Standard (*outperforms state)*

Groups	Charter 2022	State 2022	Charter 2023	State 2023
All Students	+45.2 points*	-12.2 points	-8.6 points*	-13.6 points
SED	+57.1 points*	-41.4 points	-13.8 points*	-42.6 points
African American	+39 points*	-57.7 points	-14.2 points*	-59.6 points

*Mathematics, Distance from Standard (*outperforms state)*

	Charter 2022	State 2022	Charter 2023	State 2023
All Students	-74.2 points	-51.7 points	-123.5 points	-49.1 points
SED	-73.4 points*	-84 points	-125.4 points	-80.8 points
African American	-84.3 points*	-106.9 points	-130.1 points	-104.5 points

*College and Career Indicator (*outperforms state)*

	Charter 2022	State 2022	Charter 2023	State 2023
All Students	NA	NA	52.1%*	43.9%
SED	NA	NA	51.6%*	25.1%
African American	NA	NA	42.9%*	35.4%

*English Learner Performance Progress Indicator (*outperforms state)*

	Charter 2022	State 2022	Charter 2023	State 2023
English Learners	43.8% ⁺	50.3%	46.2% ⁺	48.7%

⁺Less than 30 students represented in this group for this year

Local Data

A middle-performing charter school may choose (but is not required) to provide verified data aligned to the May 2023 State Board of Education guidance to further support its case for renewal. When a charter school does provide verified data, authorizers are required to consider it for charter schools in the middle and low-performing levels.

SCHS did share verified data in the form of the percentage of students scoring 3 or 4 on the CAASPP (pages 52-53) and the Dataquest UC/CSU eligibility and college-going rates for the graduating classes of 2020 and 2021 (pages 12-13, 22-23). District staff was able to validate this data on the CAASPP and DataQuest websites. Below is a summary of that data for the statistically significant student groups in the two most recent years. **State data includes only students tested in grade 11.

English Language Arts, Percent Met or Exceeded Standard (Data Quest / CAASPP Website)

	Charter 2022	State 2022	Charter 2023	State 2023
All Students	68.6%*	54.8%	44.3%	55.4%
SED	74.6%*	36.8%	41.2%	46.0%
African American	64.5%*	45.0%	39.5%*	38.1%

Mathematics, Percent Met or Exceeded Standard (Data Quest / CAASPP Website)

	Charter 2022	State 2022	Charter 2023	State 2023
All Students	25.6%	27.0%	5.0%	27.4%
SED	27.1%*	16.5%	2.0%	16.9%
African American	24.4%*	11.3%	2.6%	11.8%

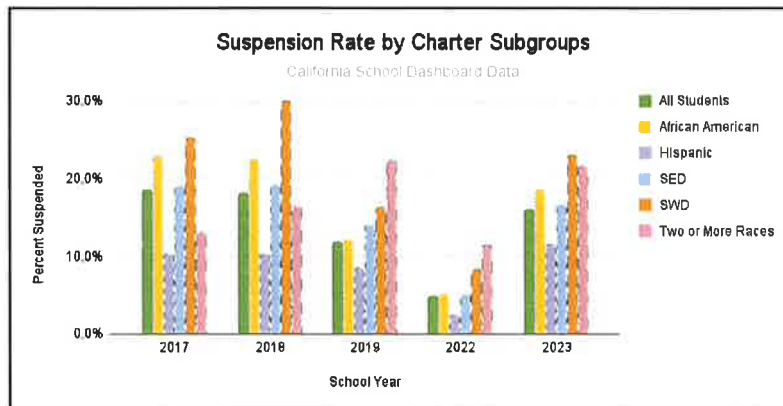
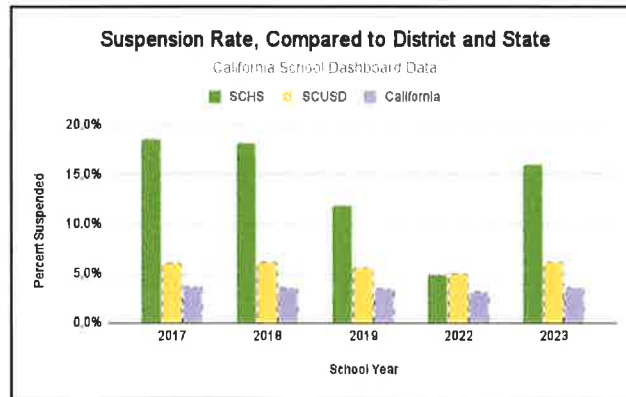
It is worth noting that the California Department of Education reports A-G completion / met UC/CSU requirements rates in different ways across different years and data sources. Below is the most recent report available through the additional reports on the Dashboard.

Met UC/CSU Requirements Completion Report (2023, California School Dashboard Additional Reports)

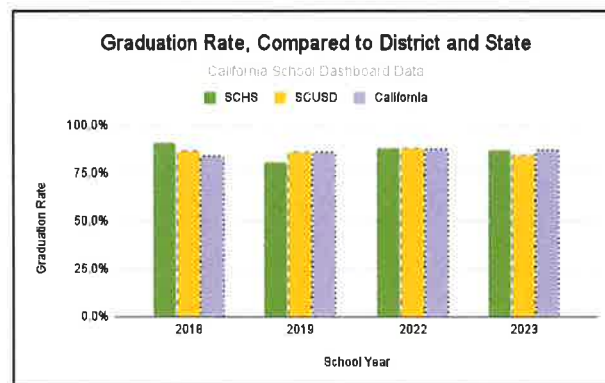
	All Students	African American	Hispanic	SED	SWD
Number	64	36	16	56	9
Percent	86.5%*	85.7%*	80.0%*	86.2%*	75.0%*
State (CA)	44.5%	32.5%	36.8%	36.3%	14%

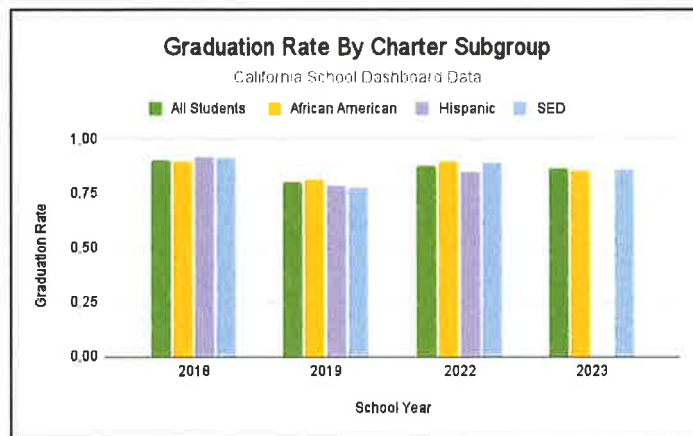
Other Dashboard Data

Suspension Data, California School Dashboard, 2017-2023



Graduation Rate, California School Dashboard, 2017-2023





CONCLUSION

Based on the above findings of fact and **Sacramento Charter High School's** designation as a **MIDDLE-PERFORMING** charter school, the District's review team has concluded that the renewal petition, coupled with the corrective action plan submitted in response to the Notice to Cure, **collectively meet the minimum legal standards under the Education Code to qualify for approval for the requested five-year term, beginning July 1, 2025, through June 30, 2030.**

If the District's Board takes action to approve the renewal petition, District staff will oversee SCHS's full satisfaction of the corrective actions described in the plan and any other conditions or oversight items that the Board may direct.

The Board will be provided with sample resolution language for all decision options.



CHARTER SCHOOL PETITION EVALUATION

This document was created in partnership and support of the Charter Accountability and Resource Support Network (CARSNet) Advisory Board: L. Karen Monroe, Alameda County Superintendent of Schools, CARSNet; Wes Stewart, Executive Director, Association of California School Administrators (ACSA); Molly Magee-Hewitt, CAO/CEO, California Association of School Business Officials (CASBO); Dana Dean, Solano County Board of Education/Immediate Past-President, California County Board of Education (CCBE); Ted Alejandre, San Bernardino County Superintendent of Schools/President, California County Superintendents Educational Services Association (CCSESA); Vernon Billy, CEO/Executive Director, California School Boards Association (CSBA); and Michelle Giacomini, Deputy Executive Director, Fiscal Crisis and Management Assistance Team (FCMAT).

TABLE OF CONTENTS

	Page
I. Introduction	
Reviewing Charter School Petitions	1
<i>Guiding Principles</i>	
<i>State Guidance</i>	
Instructions to Petition Review Team	1
<i>Evaluation Rubric</i>	
Petition Review Team	2
<hr/>	
II. Petitioner Certification	
Instructions to Lead Petitioner	3
<i>Certified Signature of Petitioner</i>	
Acceptance by District/COE	3
Petition Appeal Acceptance (COE Use Only)	3
<hr/>	
III. Intake Information / Cover Sheet	
Petition Review Timeline (Authorizer Use Only)	4
Petitioner Intake Information	4
<i>Contact Information</i>	
<i>Proposed Grade Span</i>	
<i>Facility Information</i>	
<i>Related Business Organizations & Other Corporate</i>	
<i>Affiliations Affiliated Schools and Prior Charter School</i>	
<i>Experience Special Education - SELPA Information</i>	
<hr/>	
IV. Required Petition Elements	
A. Education Program	5
B. Measurable Student Outcomes	6
C. Student Progress Measurement	7
D. Governance Structure	7
E. Employee Qualifications	8
F. Health and Safety	8
G. Racial & Ethnic Balance	9
H. Admissions Policies and Procedures	9
I. Annual Financial Audits	10
J. Suspension and Expulsion	10
K. Staff Retirement System	11
L. Attendance Alternatives	11
M. Post-employment Rights of Employees	11
N. Dispute Resolution Process	12
O. Closure Procedures	12
<hr/>	

TABLE OF CONTENTS

	Page
V. Required Supplemental Criteria	
Financial/Administrative Plan	13
Charter Management Organizations	15
Facilities	16
Impact Statement	17
Community Impact	17
Special Education	18
Required Declarations/Affirmations	19
<hr/>	
VI. Alternative Education School Criteria	
Criteria for Alternative Education Charter Schools, if applicable	20
<hr/>	
VII. Independent Study Supplemental Criteria	
Independent Study/Non-Classroom Based Instruction, if applicable	21
<hr/>	
VIII. Charter School Petition Review Findings of Fact	22
<hr/>	
IX. Glossary	23-24
<hr/>	

Reviewing Charter School Petitions

Guiding Principles

The Charter School Petition Evaluation Matrix was developed to align with the Education Code (EC), state regulations and other pertinent laws required for reviewing charter school petitions. The purpose of this tool is to help guide the schools and the reviewer through the charter school petition preparation and review process.

State Guidance

The California Code of Regulations, Title 5, section 11967.5 provides the following guidance for reviewing a charter petition: *"The criteria are intended to require no charter provisions in excess of those that the State Board of Education believes necessary to determine whether each element specified in Education Code section 47605(b) has been satisfactorily addressed. Where the criteria call for judgments to be made, the judgments will be made in such a manner as to be reasonable, rational, and fair to the petitioners and other parties potentially affected by the chartering of the school ..."*

The California Code of Regulations, Title 5, section 11967.5.1(g) states that a "reasonably comprehensive" description shall include, but not be limited to, information that:

- (1) *Is substantive and is not, for example, a listing of topics with little elaboration.*
- (2) *For elements that have multiple aspects, addresses essentially all aspects of the elements, not just selected aspects.*
- (3) *Is specific to the charter petition being proposed, not to charter schools or charter petitions generally.*
- (4) *Describes, as applicable among the different elements, how the charter school will:*
 - A) *Improve pupil learning.*
 - (B) *Increase learning opportunities for its pupils, particularly pupils who have been identified as academically low achieving.*
 - (C) *Provide parents, guardians, and pupils with expanded educational opportunities.*
 - (D) *Hold itself accountable for measurable, performance-based pupil outcomes.*
 - (E) *Provide vigorous competition with other public school options available to parents, guardians, and student.*

Instructions To Charter School Petition Review Team / Evaluation Rubric

1. **Identify your team.** Determine who will be responsible for reviewing which sections of the charter petition document. Record team members' names on the Petition Review Team page to help track responsibilities.
2. **Rate the charter school petition** in the various petition Elements and Supplemental sections of the Evaluation Matrix.
 - a. Mark either "met" or "not met" in the "Evaluation Standard Met" Column for each specific criterion. Criteria in **RED** indicate a description that is required under law to be included in the charter petition. Criteria in **BLACK** are descriptions that are strongly suggested to be included to ensure that the charter petition is reasonably comprehensive.
 - b. Use the state guidance and rating definitions below to guide your assessment.
 - c. At the end of each section, elaborate in the comment section on the areas rated as "not met".
3. **Analyze the results.** At the end of this process, determine whether the petition is reasonably comprehensive or if there are any identified Findings of Fact. This tool should be used as part of the final analysis and report to the district governing board.

Evaluation Standard Met:

The charter petition demonstrates solid preparation and grasp of key issues that indicate a reasonably comprehensive description. Overall, the charter petition contains many characteristics of concise, specific, and accurate information. The standard may be met if the charter petition requires additional, non-substantive elaboration in places.

Evaluation Standard Not Met:

The charter petition addresses some of the criteria but lacks meaningful detail. The description requires important or key additional information to be reasonably comprehensive. It demonstrates a lack of preparation, is unclear, and uses generic information, or otherwise raises substantial concerns about the petitioner's understanding of the issue in concept. Additional substantiated information would be required to determine the charter petitioner's ability to implement or meet the requirement in practice.

The Petition Review Team

Identify your team and who will be responsible for reviewing which sections of the charter school petition document.

Area of Review (§47605(c))	Department Responsible	Name of Reviewer
A. Education Program	SCUSD Review Team	Hunt/Goldman/Mandelbaum
B. Measurable Student Outcomes	SCUSD Review Team	Hunt/Goldman/Mandelbaum
C. Student Progress Measurement	SCUSD Review Team	Hunt/Goldman/Mandelbaum
D. Governance Structure	SCUSD Review Team	Daugherty/Goldman/Mandelbaum
E. Employee Qualifications	SCUSD Review Team	Daugherty/Goldman/Mandelbaum
F. Health and Safety	SCUSD Review Team	Daugherty/Goldman/Mandelbaum
G. Racial & Ethnic Balance	SCUSD Review Team	Hunt/Daugherty/Goldman
H. Admissions Policies and Procedures	SCUSD Review Team	Goldman/Mandelbaum
I. Annual Financial Audits	SCUSD Review Team	Deal/Guzman
J. Suspension and Expulsion	SCUSD Review Team	Daugherty/Goldman/Mandelbaum
K. Staff Retirement System	SCUSD Review Team	Daugherty/Goldman/Mandelbaum
L. Attendance Alternatives	SCUSD Review Team	Hunt/Goldman/Mandelbaum
M. Post-Employment Rights of Employees	SCUSD Review Team	Daugherty/Goldman/Mandelbaum
N. Dispute Resolution Process	SCUSD Review Team	Goldman/Mandelbaum
O. Closure Procedures	SCUSD Review Team	Deal/Guzman

Supplemental Criteria

Areas of Review EC §47605(c), §47605(e), §47605(h), §47641(a), §47646	Department Responsible	Name of Reviewer
Financial/Administrative Plan	SCUSD Review Team	Deal/Guzman
Charter Management Organization (i.e. "entities managing charter schools")	Not Applicable	Not Applicable
Facilities	SCUSD Review Team	Goldman/Mandelbaum
Impact Statement	SCUSD Review Team	Daugherty/Goldman/Mandelbaum
Community Impact	SCUSD Review Team	Daugherty/Goldman/Mandelbaum
Special Education	SCUSD Review Team	Daugherty/Mandelbaum
Required Declarations/Affirmations	SCUSD Review Team	Daugherty/Mandelbaum
Independent Study, if applicable	Not Applicable	Not Applicable
Alternative Charter Schools, if applicable	Not Applicable	Not Applicable

Sacramento
Charter
High School

FORM A: Certification of Completion-Renewals & Material Revisions

RENEWAL/MATERIAL REVISION PETITIONER CERTIFICATION
(must be completed and signed by petitioner)

Education Code §47605(b): A petition is deemed received by the governing board of the school district for purposes of commencing the timelines described in this subdivision on the day the petitioner submits a petition to the district office, along with a signed certification that the petitioner deems the petition to be complete.

I hereby certify under the laws of the State of California and the United States that the foregoing petition and cover page(s) are deemed complete, true and correct. I understand and acknowledge that failure to provide accurate or complete information may subject the charter to revocation if later discovered and material to compliance with the Charter Schools Act.

Lisa Marie Ruda

Name of Lead Petitioner

Amanda Goldman

Name of Receiving District Contact

6/28/24

Date Submitted

6/28/24

Date Received

Lisa M. Ruda

Signature

[Signature]

Signature



SAC HIGH

SJL 6/28/24

Charter Petition Submission Checklist: Submitting a Complete Petition Package

- ✓ The *Petition Review Matrix* with page numbers identifying the location of legal requirements. *- Appendix*
- ✓ **Flash Drive:** One (1) organized electronic copy of all documents with clear naming conventions.
- ✓ **Binders:** Two (2) additional binders containing the complete petition submission. Use tabs to separate each section.

Include

- ✓ Table of Contents
- ✓ A cover letter signed by the governing board president, or designee
- ✓ Board meeting minutes authorizing the submission of the charter petition.
- ✓ **New Petitions:** Articles of Incorporation and By-laws for the non-profit organization
- ✓ **Revisions & Renewals:** An Executive Summary summarizing the proposed substantive changes to the petition
 - Use a two-column table. Include a charter element on the left and a description of revisions on the right.
 - Substantive changes include but are not limited to governance structure/ bylaws, grade levels served, location(s), and any changes to the design or intent of the program as described in the existing petition. Include references to Ed Code.
- ✓ A signed Certification of Completion (Forms A or Form B), E.C. §47605(b).
- ✓ A FULLY UPDATED (track-changes (Word) and clean copy (PDF)) charter petition including
 - Include all content required by all newly enacted laws and regulations pertaining to charter schools since the previous authorization.
 - A reasonably comprehensive description of all 15 elements and supplemental sections with legal assurances. It is highly recommended that the lead petitioner review the petition against the *Matrix* before submitting it.
 - A financial plan/proposed budget including reasonable multi-year projections and cash flow for at least 3 subsequent years. Electronic copies must be in Excel format.
 - The Appendix of supporting documents (See FORM D)
- ✓ The Appendix and supplemental materials will not be reviewed in place of a reasonably comprehensive description of the required charter petition elements, E.C. §47605.

Deliver both binders and the flash drive to Serna Center, Sacramento City Unified School District, 5735 47th Avenue, Sacramento, CA, 95824; Attn: Amanda Goldman

- | | | |
|----|-----------------|--|
| ✓ | ▶ Form A | <i>Signed Certification of Completion- Renewals & Material Revisions</i> |
| NA | ▶ Form B | <i>Signed Certification of Completion- New Petitions</i> |
| ✓ | ▶ Form C | <i>Renewal Performance Report</i> |
| ✓ | ▶ Form D | <i>Suggested Appendix Documents</i> |
| NA | ▶ Form E | <i>Courtesy Copy Only: Charter Petition Process</i> |



CHARTER SCHOOL PETITION EVALUATION MATRIX

Intake Information/Cover Sheet

Petitioner Information	Petition Review Timelines (District Use Only)		
Name of Proposed Charter School	<input type="checkbox"/> Initial Petition	<input type="checkbox"/> Material Revision	<input type="checkbox"/> Renewal
Sacramento Charter High School	Petition Submitted:	Pubic Hearing	Decision Hearing
Name & Position of Lead Petitioner	6.28.2024	<i>Within 60 days of submission</i>	<i>Within 90 days of submission but may be extended 30 days if mutually agreed</i>
Lisa Ruda, Superintendent			
Phone and Email			
916-277-6200		Due Date	Due Date
Address	Was an Extension Requested / Agreed Upon?	8.27.2024	9.26.2024
2315 24th Street, CA, 95817		Date Held	Date Held
Proposed Grade Span	<input type="checkbox"/> Yes	8.8.2024	9.19.2024
9-12	<input checked="" type="checkbox"/> No		

New Petitions Only	
<p>Education Code §47605(a)(1): A petition for the establishment of a charter school shall identify a single charter school that will operate within the geographic boundaries of that school district. A charter school may propose to operate at multiple sites within the school district if each location is identified in the charter school petition. The petition may be submitted to the governing board of the school district for review after either of the following conditions is met:</p>	
<p>(A) The petition is signed by a number of parents or legal guardians of pupils that is equivalent to at least one-half of the number of pupils that the charter school estimates will enroll in the charter school for its first year of operation</p>	<ul style="list-style-type: none"> • NO • YES
<p>(B) The petition is signed by a number of teachers that is equivalent to at least one-half of the number of teachers that the charter school estimates will be employed at the charter school during its first year of operation</p>	<ul style="list-style-type: none"> • NO • YES

Facility Information			
Facilities Have Been Secured (select yes or no)	YES (List proposed address below)		NO (List facilities being considered below)
Proposed Facility Address	2315 34th Street	Sacramento	CA 95817
	<small>Street</small>	<small>City</small>	<small>State Zip Code</small>
Facilities Being Considered (Include any Prop 39 Facility Requests being proposed)			
	<small>Street</small>	<small>City</small>	<small>State Zip Code</small>
	<small>Street</small>	<small>City</small>	<small>State Zip Code</small>



Special Education - SELPA Information

Has Charter School applied for or been approved as LEA member of SELPA?	<u>YES</u> NO	If YES , Provide LEA #, Name of SELPA & Contact	El Dorado Charter SELPA
If NO , explain intent for special education compliance as a charter school in the charter petition. (See <i>Supplemental Criteria section of the Evaluation Matrix</i>)			

CHARTER SCHOOL PETITION EVALUATION MATRIX

15 Charter Elements

Criteria in RED indicate a description that is required under law to be included in the charter petition.

Criteria in BLACK are descriptions strongly suggested to be included to ensure that the charter petition is reasonably comprehensive.

A. Description of Vision, Mission, and Educational Program		
Evaluation Criteria: E.C. §47605(c)(5)(A) THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. Targeted Student Populations and Community Need		
a. students the charter school will attempt to educate and a demonstration of need for proposed educational program	YES	77, 78
b. grade levels and number of students the charter school plans to serve	YES	77
c. a clear, concise school mission and vision statement that aligns with the target population	YES	78
d. the needs and challenges of the student groups to be served	YES	
2. Attendance		
a. school year/academic calendar, number of school days and instructional minutes	YES	Appendix 1
b. attendance expectations and requirements, including enrollment projections	YES	Appendix 1
c. master/daily schedule and proposed bell schedule	YES	Appendix 1
3. What It Means to Be an Educated Person in the 21st Century		
a. goals that are consistent with enabling all pupils to become or remain self-motivated, competent, lifelong learners	YES	80
b. list of academic skills and qualities important for an educated person	YES	80
c. list of general non-academic skills and qualities important for an educated person	YES	80
4. How Learning Best Occurs/Instructional Design, including subgroup program (CCR §11967.5.1. (f)(C))		
a. a framework for instructional design that is aligned with the needs of the students that the charter has identified as its target student population	YES	81
b. description of learning setting (e.g., site-based matriculation, independent study, tech-based)	YES	77
c. instructional approaches and strategies school will utilize that will enable the school's students, including subgroup populations such as English language learners (ELL), to master the content standards for the core curriculum areas adopted by the SBE	YES	81-101 (Gen Ed) 102-114 (SPED) 115-124 (EL)
d. process for developing or adopting curriculum and teaching methods		
e. how the charter school will identify and meet the needs of students with disabilities, ELLs, students achieving substantially above or below grade level expectations, and other special student populations. - the description demonstrates understanding of the likely ELL population - includes sound approach to identify and meet the needs of subgroup populations	YES	104 (SPED) 115-124 (EL)
f. special education plan including, but not limited to, the means by which the charter school will comply with the provisions of EC section 47641	YES	103
g. a plan for professional development that aligns with the charter school's proposed program	YES	98
5. Materials, Including Technology		
a. how staff's and students' technology resources are aligned to the instructional program and meet state assessment requirements	YES	101
b. what materials are available to students: student-to-computer ratio appears reasonable	YES	101
c. a description or plan for providing adaptive technology for SPED students	YES	108
d. Common Core technology standards, digital assessments, and professional learning	YES	144

CHARTER SCHOOL PETITION EVALUATION MATRIX

6. Annual Goals

a. annual goals for all pupils and for each subgroup of pupils identified pursuant to section 52052 that apply to the grade levels served	YES	LCAP
<u>b. goals tied to state priorities listed in EC section 52060(d) and LCAP, as appropriate.</u> <u>- Additional priorities related to unique aspects of the proposed charter school program include goals and specific annual actions</u>	YES	App. 2-3
c. specific annual actions designed to achieve the stated goals	YES	App. 2-3

7. Description Requirements for Charter Schools Serving High School Students

a. how parents will be informed about the transferability of courses to other public high schools	YES	122, parent handbook
b. how parents will be informed about the eligibility of courses to meet college entrance requirements	YES	122
c. how each student will receive information on how to complete and submit a FAFSA or California Dream Act Application at least once before the student enters grade 12	YES	123
d. how the exit outcomes will align to mission, curriculum, and assessments	YES	122
e. affirmation that all students will have the opportunity to take courses that meet the 'A-G' requirements	YES	122, Grad Req
f. planned graduation requirements and WASC accreditation are defined	YES	122

Comments by review team:

B. Measurable Student Outcomes

<u>Evaluation Criteria: E.C. §47605(c)(5)(B)</u> THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. Measurable pupil outcomes for all groups, and for each numerically significant subgroup, including specific assessment methods or tools listed for each outcome	YES	LCAP, App 2-3
2. A description of how pupil outcomes align with the state priorities consistent with LCAP, as described in EC 52060(d), that apply for the grade levels served or the nature of the program	YES	127
3. Specific annual actions designed to achieve the stated goals	YES	LCAP
4. Additional school priorities related to unique aspects of the proposed charter school program, with goals and specific annual actions	YES	LCAP
5. Description of how pupil outcomes will address state content and performance standards in core academic areas	YES	131
6. Description of how exit outcomes align to the mission and instructional design of the program	YES	131
7. Description or affirmation that "benchmark" skills and specific classroom-level skills will be developed	YES	131
8. School-wide student performance goals students will achieve over a given period of time, including projected attendance levels, dropout percentage, and graduation rate goals	YES	131

Comments by review team:

CHARTER SCHOOL PETITION EVALUATION MATRIX

C. Student Progress Measurement

Evaluation Criteria: <u>E.C. §47605(c)(5)(C.)</u> THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. Assessment tools that include all required state and federal assessment (SBAC, ELPAC, etc.) for purposes of accountability	YES	127-131
2. At least one assessment method or tool listed for each of the exit assessments	YES	129-130
3. A variety of alternative assessment tools, including tools that employ objective means of assessment consistent with the measurable pupil outcomes	YES	128-130
4. Chosen assessments are appropriate for standards and skills the charter school seeks to measure	YES	128-130, LCAP Metrics
5. A plan for collecting, analyzing/utilizing and reporting student/school performance to charter school staff and to students' parents and guardians, and for utilizing the data continuously to monitor and improve the charter school's educational program	YES	131

Comments by review team:

D. Governance Structure

Evaluation Criteria: <u>E.C. §47605(c)(5)(D)</u> THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. Evidence of the charter school's incorporation as a nonprofit benefit corporation	YES	133, App 4
a. provides the names and relevant qualifications of all persons whom the petitioner nominates to serve on the governing body of the charter school.	YES	App 4
b. includes a set of bylaws and basic policies	YES	App 4
2. Evidence that the organizational technical designs of the governance structure reflect: - a seriousness of purpose to ensure that the charter will become and remain a viable enterprise - understanding and assurance of compliance with open meeting requirements	YES	135, 136, App 4
3. Key features of governing structure including, but not limited to:	YES	
a. delineation of roles and responsibilities of the governing board and staff	YES	135
b. a clear description of the flexibility and level of autonomy the charter school has from the charter management organization over budget, expenditures, personnel, and daily operations	YES	133-134
c. size/composition of board, board committees and/or advisory councils	YES	App 4
d. method for selecting initial board members and election/appointment for board member replacement	YES	135, 136, App 4
4. A process for involvement or input of parents/guardians in the governance of the charter school including:	YES	138, App 4
a. a clear delineation of roles and responsibilities of parent councils, advisory committee or other supporting groups	YES	App 4
b. a description how it shall notify the parents and guardians of applicant pupils and currently enrolled pupils that parental involvement is not a requirement for acceptance to or continuation at, the charter school	YES	App 4
5. Specific policies and internal controls that will prevent fraud, embezzlement, and conflict of interest and ensures the implementation and monitoring of those policies	YES	App 4
6. A description and frequency of board trainings/workshops	NO	
7. Other important legal or operational relationships between the charter school and granting agency	NO	

CHARTER SCHOOL PETITION EVALUATION MATRIX

Comments by review team:

E. Employee Qualifications

Evaluation Criteria: E.C. §47605(c)(5)(E) THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. Core and college preparatory teachers, and affirms all teachers will hold appropriate Commission on Teacher Credentialing certificates (new on July 1, 2020)	YES	148
2. Those positions that the charter school regards as key, and specifies the additional qualifications expected of individuals assigned to those positions, their responsibilities and accountability	YES	142-150, App 5
3. General qualifications for the various categories of employees (e.g., other administrative, instructional support, non-instructional support). These qualifications shall be sufficient to ensure the health and safety of the charter school's faculty, staff, and students.	YES	142-150
4. A clear plan for recruitment, selection, development and evaluation of staff and charter school leader	YES	144, 148, 149
5. Roles and lines of authority for board and management positions	YES	136-137
6. Qualifications for non-core, non-college prep teaching positions staffed by non-certified teachers	NO	
7. Proposed teacher to student ratio	NO	

Comments by review team:

F. Health and Safety Procedures

Evaluation Criteria: §47605(c)(5)(F) THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. A comprehensive charter school safety plan and assurance that all charter school staff will be trained on this plan and that the plan will be updated annually	YES	153, App 6
2. Assurances that the charter school will require a criminal background clearance report, and proof of tuberculosis examination prior to employment	YES	154, 155
3. Assurances that the charter school will adopt procedures to prevent acts of bullying and cyberbullying, and make the CDE online training module available to all employees who interact with students	YES	156, 158, App 6
4. Affirmation that charter schools with grades 7-12 will adopt a suicide prevention policy	YES*	157
5. Health and safety practices for students and staff	YES	152-160
a. references include health and safety related policies/procedures or the date by which they will be adopted and submitted to the authorizer	YES	App 6
7. Assurances on the compliance with ADA (Americans with Disabilities Act)	YES	6, 7, 153

Comments by review team:

CHARTER SCHOOL PETITION EVALUATION MATRIX

G. Racial and Ethnic Balance		
Evaluation Criteria: <u>E.C. §47605(c)(5)(G)</u> THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. Specific practices/policies the charter school will design and implement to attract a diverse applicant pool/enrollment that is reflective of the general population, including special populations residing within the territorial jurisdiction of the district	YES	160, 163, 166
2. Practices and policies appear likely to achieve racial and ethnic balance	YES	162, 165, 168
3. The outreach strategies, identifying specifically who the targeted groups will be, including developed or planned benchmarks for achieving balance	YES	162-168
4. Types of supports that will be provided to maintain enrollment balance (counselors, support staff, medical-related staff, etc.)	YES	82, 165
Comments by review team: <div style="height: 100px; border: 1px solid black;"></div>		
H. Admissions Requirements, If Applicable		
Evaluation Criteria: <u>§47605(c)(5)(H)</u> THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. The following assurances: The charter school shall be nonsectarian in its programs, admission policies, employment practices, and all other operations, shall not charge tuition, and shall not discriminate against a pupil on the basis of disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained in the definition of hate crimes set forth in Section 422.55 of the Penal Code, including immigration status, equal rights, and opportunities in the educational institutions of the state	YES	170
2. A clear description of admission policies that meet the state and federal permissive preferences	YES	170
3. A clear description of how students in the community will be informed and given an equal opportunity to attend the charter school. All promotional material must clearly state the charter school will serve ALL students.	YES	171 / App. 2
4. Proposed admissions and enrollment requirements, process, and timeline, and includes:	YES	172
a. information to be collected through the interest form, application form, and/or enrollment form		
b. assures enrollment preferences will not require mandatory parent volunteer hours as a criteria for admission	YES	172
5. Description of the public random drawing processes that coincide with state and federal laws	YES	172
6. Assurances that preferences, if given, are not likely to negatively impact the racial, ethnic, and unduplicated balance the charter school strives to reflect	YES	174
Comments by review team: Charter did not submit example of application or enrollment form		

CHARTER SCHOOL PETITION EVALUATION MATRIX

I. Annual Independent Financial Audits

<u>Evaluation Criteria: §47605(c)(5)(I)</u> THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. The manner in which the audit will be conducted	Yes	177-178
2. Procedures to select and retain an independent auditor including: - qualifications that will be used for the selection of an independent auditor - assurance that the auditor will have experience in education finance	Yes	177-178
3. Assurance that the annual audit will employ generally accepted accounting principles	Yes	177-178
4. Scope and timing of audit, as well as distribution of completed audit to authorizer, county office, State Controller, California Department of Education, and/or other agencies required under law	Yes	177-178
5. A process and timeline that the charter school will follow to address any audit findings and/or resolve audit exceptions	Yes	177-178
6. Assurance that the charter school will satisfy any audit deficiencies to the satisfaction of the authorizer	Yes	177-178
7. Who is responsible for contracting with and overseeing the independent audit	Yes	177-178
Comments by review team: The petition describes a standard process of contracting with an audit firm and complying with the appropriate Ed Code requirements. However, significant concern remains given the repeated audit findings pointed out in the previous two years. These findings are serious in that they call into question internal control issues for the charters financial statements and processes. Another issue of note is the failure to provide timely bank reconciliations, which was also noted during the audit process.		

J. Suspension and Expulsion Procedures

<u>Evaluation Criteria: E.C. §47605(c)(5)(J)</u> THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. A process for suspensions of fewer than 10 days, including	YES	194-196
a. oral or written notice of the charges against the pupil	YES	194-195
b. if the pupil denies the charges, an explanation of the evidence that supports the charges	YES	194
c. how an opportunity will be provided for the pupil to present his/her rebuttal to the charges	YES	194
2. A process for suspensions of 10 days or more and all other expulsions for disciplinary reasons, including	YES	196-202
a. timely, written notice of the charges against the pupil and an explanation of the pupil's basic rights	YES	196-197
b. a process of hearing adjudicated by a neutral officer within a reasonable number of days, and at which the pupil has the right to bring legal counsel or an advocate	YES	197
3. A clear statement that no pupil shall be involuntarily removed by the charter school for any reason unless the parent or guardian of the pupil has been provided written notice and that ensures the written notice shall be in the native language of the pupil or the pupil's parent or guardian	YES	183
4. Understanding of relevant laws protecting constitutional rights of students	YES	181-202
a. provides for due process for all students and demonstrates understanding of the rights of students with disabilities in regard to suspension, expulsion, and involuntary dismissal	YES	203-206
b. explanation of how authorizer may be involved in disciplinary matters	YES	202

Comments by review team:

This section is complete and there is no evidence of a new or additionally adopted suspended/expulsion policy. However, it is a concern that the suspension rate has increased for all subgroups in the recent year while enrollment and graduation rates have declined (data based on 2023 Dashboard).

CHARTER SCHOOL PETITION EVALUATION MATRIX

K. California State Teacher Retirement System		
Evaluation Criteria: E.C. §47605(c)(5)(K) THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. A statement of what retirement options will be offered to employees	YES	208
a. STRS (if STRS, then all teachers must participate)	YES	208
b. PERS	NA	
c. Social Security	YES	208
2. Whether retirement will be offered with language clearly reflecting one of the following choices for each retirement system - coverage will be offered to eligible employees - the charter school retains the option to elect the coverage at a future date - the charter school will not offer coverage	YES	208
3. Who is responsible for ensuring that the appropriate arrangements for coverage have been made	YES	208
Comments by review team: Teachers and other appropriate employees participate in STRS. Non-certificated staff have social security and a retirement account.		
L. Public School Attendance Alternatives		
Evaluation Criteria: E.C. §47605(c)(5)(L) THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. Attendance alternatives for students residing within the county who choose not to attend the charter school	YES	210
Comments by review team:		
M. Post-employment Rights of Employees		
Evaluation Criteria: E.C. §47605(c)(5)(M) THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. School district employee's return employment rights, including	YES	212
a. whether, and how staff may resume employment within the district or authorizer	YES	212
b. the ability to transfer sick/vacation leave to and from charter and another LEA	YES	212
c. whether staff will continue to earn service credit (tenure) in district while employed at charter	YES	212
2. Whether collective bargaining contracts of charter authorizer will be a controlling document		
Comments by review team:		

CHARTER SCHOOL PETITION EVALUATION MATRIX

N. Dispute Resolution Procedures		
Evaluation Criteria: E.C. §47605(c)(5)(N) THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. A process for the charter and the authorizer to settle disputes relating to the provisions of the charter	YES	215
2. The process by which charter will resolve internal complaints and disputes	YES	216
a. includes Uniform Complaint procedures and description of how this process is communicated to parents, staff, and the community	YES	216
3. Acknowledgement that except those disputes between the chartering authority and the charter school, all disputes involving the charter school shall be resolved by the charter school according to the charter school's own internal policies		
4. Statement that if any such dispute concerns facts or circumstances that may be cause for revocation of the charter, the authorizer shall not be obligated by the terms of the dispute resolution process as a precondition to revocation		
Comments by review team:		
O. Closure Procedures		
Evaluation Criteria: E.C. §47605(c)(5)(O) THE PETITION DESCRIBES, AT MINIMUM	Evaluation Standard Met YES / NO	Located on Page(s)
1. The procedures to be used if the charter school closes, including:	YES	218-220
a. who is the responsible entity/person that will conduct closure-related activities		
b. process for submission of final financial reports, expenditure reports for entitlement grants, and the filing of any required final expenditure and performance reports		
2. The maintenance plan for pupil records and the manner in which parents/guardians may obtain copies of pupil records if the charter school closes, including how information will be preserved and transferred.	YES	218
3. A process of how charter will ensure a final audit of the charter school	YES	219
a. an assurance it will be conducted within six months of closure	YES	219
b. the disposition of the charter school's assets	YES	219
c. plans for disposing net assets	YES	219
4. The transfer and maintenance of personnel records in accordance with applicable law	YES	219
Comments by review team:		

CHARTER SCHOOL PETITION EVALUATION MATRIX

Required Supplemental Criteria

Criteria in RED indicate a description that is required under law to be included in the charter petition.

Criteria in BLACK are strongly suggested to be included to ensure that the charter petition is reasonably comprehensive.

Financial/Administrative Plan		
Evaluation Criteria: E.C. §47605(h) The petition describes, at minimum	Evaluation Standard Met Yes / No	Located on Page(s)
1. A One Year Operational Budget (current year or first year)		
a. annual revenues and expenditures clearly identified by source	Yes	Supplemental MYFP
b. revenue assumptions in alignment with applicable state and federal funding formulas	No	Assumptions not Provided
c. expenditure assumptions that reflect the school design plan	No	Assumptions not Provided
d. expenditure assumptions that reflect market costs	No	Assumptions not Provided
e. revenues from grants or other proposed fundraising that are not critical to fiscal solvency	No	Assumptions not Provided
f. minimum reserve level and projected positive ending fund balance (the larger of 3% of expenditures, or \$25,000)	Yes	Supplemental MYFP
g. if expenditures exceed revenues in first year of operations, identifies sources of capital sufficient to cover deficits until the budget is projected to balance	Yes	Supplemental MYFP
h. expenditures for property and liability insurance that name the district/authorizer as additional insured (and/or a hold harmless agreement)	No	Not provided
i. expenditures for reasonably expected legal services	Yes	Assumptions not provided
j. expenditures for special education excess costs consistent with current experiences in the school district/county office	No	Assumptions not provided
k. expenditures for facilities – if specific facilities not secured, reasonable projected cost	Yes	Assumptions not provided
l. expenditures for required student meals that meet federal nutritional requirements	No	Assumptions not provided
m. the alignment of LCAP expenditures with the charter's budget	No	Assumptions not provided
2. Financial Projections Include a Clear Description of Planning Assumptions		
a. revenues and expenditures correlate with the number/types of students by grade level in budget	No	Assumptions not provided
b. expenditure assumptions correlate with the amount of staff in budget	No	Assumptions not provided
c. expenditure assumptions correlate with the facility needs in budget	No	Assumptions not provided
d. expenditure assumptions in alignment with overall school design plan	No	Assumptions not provided
e. revenues based on state and federal funding guidelines	No	Assumptions not provided
f. revenues based on reasonable potential growth in local, state and federal categories	No	Assumptions not provided
g. revenues based on reasonable student growth projections	No	Assumptions not provided
h. revenue from sources such as grants, loans, donations and other non-guaranteed funds not necessary for the charter to maintain fiscal solvency	Yes	Assumptions unclear
i. timeline for any referenced grant applications to be submitted and funded	No	Assumptions not provided
j. positive reserves are maintained in all three years	Yes	Assumptions unclear
k. fund balances are positive, or sources of supplemental working capital are identified	Yes	Assumptions unclear

CHARTER SCHOOL PETITION EVALUATION MATRIX

Financial/Administrative Plan		
Evaluation Criteria: E.C. §47605(h) <i>The petition describes, at minimum</i>	Evaluation Standard Met Yes / No	Located on Page(s)
3. Start-Up Costs – Initial Petition Only		
a. reasonable allocation for all major start-up costs including: <ul style="list-style-type: none"> - staffing - facilities - equipment and supplies - professional services (i.e., food services, etc.) - technology materials - assessment systems/materials - legal costs 	N/A	
b. in alignment with overall school design plan	N/A	
c. potential funding sources	N/A	
d. timeline allows for grant applications and fundraising efforts to be completed in time, if included in start-up costs	N/A	
4. Cash Flow Projections for 3 Years		
a. monthly projection of revenue receipts in line with local/state/federal funding disbursements	Yes	Appendix B
b. expenditures projected by month and corresponds with typical/reasonable schedules	Yes	Appendix B
c. balance sheet accounts projected by month	Yes	Appendix B
d. shows positive cash balance each month and/or identify sources of working capital	Yes	Appendix B
5. Structure for Administrative Services and Operations		
a. outline or process for how personnel transactions will be conducted, (i.e., hiring, payroll, leaves and retirement)	No	
b. accounting and payroll processes that reflect an understanding of school business practices and expertise to carry out the necessary functions	No	
c. plan and timeline to develop and assemble school business practices and expertise	No	
d. explanation of how school intends to manage risk, including any policies and procedures	No	
d. if operated by a non-profit organization, affirms will provide additional 501(c)(3) fiscal reports	N/A	
Comments by review team: The charter initially provided only a cash flow statement projection for fiscal years 2025-2026 through 2027-2028. However, a cash flow statement alone is insufficient for the team to assess fiscal health or make reasonable assumptions about fiscal solvency. Later, the charter submitted a Multi-Year Financial Projection (MYFP), but there were several issues with it. For instance: <ul style="list-style-type: none"> - The MYFP did not align with the Cash Flow Statement. The total revenues and expenditures outlined in the cash flow did not match those in the MYFP. Federal Revenues, for example, were materially different when comparing the MYFP with the Cash Flow statement. This is concerning given the reserve levels. - In fiscal year 2024-2025, total revenues for the MYFP were identified at \$ 8.1M. The Cash Flow statement projected \$ 8.8M in total revenues. This is a large unexplained variance, especially taking into consideration the ending net assets of \$ 922K identified in the MYFP. - The MYFP lacked supporting documentation, aside from single-line notes within the document. Typically, when providing an MYFP, the charter should include, at a minimum: <ul style="list-style-type: none"> - Narrative: A narrative statement should explain the projections in the MYFP, including details on revenue and expenditures, and account for significant variances between years. This narrative should also include key information such as ADA assumptions, Unduplicated Count assumptions, special education assumptions, etc. - FCMAT LCFF Calculator: The calculator should be included to verify that ADA and Unduplicated Count figures are projected correctly. Without the LCFF calculator, along with ADA and Unduplicated Count information, a proper analysis cannot be conducted. Without these fundamental sources of information, it is challenging to place full reliance on the financial statements provided.		

CHARTER SCHOOL PETITION EVALUATION MATRIX

Charter Management Organization, i.e. Entities Managing Charter Schools		
Evaluation Criteria: E.C. §47605(h) <i>The petition describes, at minimum</i>	Evaluation Standard Met Yes / No	Located on Page(s)
1. Name and relationship of CMO to charter school, including - roles - responsibilities - payment structure - conditions for renewal/termination - investment disclosure	NA	
2. CMO's role in the financial management of the charter and the associated internal controls		
3. Other schools and/or companies managed by the CMO		
4. CMO's history, philosophy, and past results operating other schools and/or companies		
5. CMO's Form 990s for up to prior three years		
6. Back-office provider and description of support utilized by the charter		
7. Affirmation that the CMO/back-office provider will provide timely submissions of calendar of due date items		
8. Affirmation that the CMO/back-office provider will provide timely submissions of request for information items		
Comments by review team: <div style="height: 150px; border: 1px solid black; margin-top: 5px;"></div>		

CHARTER SCHOOL PETITION EVALUATION MATRIX

Facilities		
Evaluation Criteria: E.C. §47605(h) The petition describes, at minimum	Evaluation Standard Met Yes / No	Located on Page(s)
1. Location of Facility		
a. the types and the location of the charter school facility that the petitioner proposes to operate, including <ul style="list-style-type: none"> - size and resources - safety - educational suitability 	YES	224
b. the address of the facility or a schedule for securing the facility, including the person responsible for securing the location		
c. assessment and analysis of anticipated facilities needs and viability of potential sites		
2. Current and Projected Availability		
a. current and projected availability of each charter school site, and schedule for securing the facility		
b. assurances of all legal compliance with health and safety, ADA, and applicable building codes		
c. adequate budget for anticipated costs, including renovation, rent, maintenance and utilities		
d. statement whether a request will be made for use of authorizer-owned facilities		
e. lease or occupation agreement for privately obtained facilities, and/or provides a copy of the lease agreement		
Comments by review team:		

CHARTER SCHOOL PETITION EVALUATION MATRIX

Impact Statement		
Evaluation Criteria: E.C. §47605(h) <i>The petition describes, at minimum</i>	Evaluation Standard Met Yes / No	Located on Page(s)
1. Number of students anticipated to enroll	No	
2. Identification of whether charter will request to purchase support services from authorizer	YES	224
3. Affirmation there will be a Memorandum of Understanding between the authorizer and charter school	YES	225
4. Processes and policies between charter and authorizer		
a. includes process, activities and associated fees for oversight of charter		
b. includes processes, timelines, and evaluation criteria for annual review and site visits		
c. includes regular, ongoing fiscal and programmatic performance monitoring and reporting		
d. includes process, timelines and evaluation criteria for charter renewal		
e. outlines other important legal or operational relationships between authorizer and charter school		
5. Criteria and procedure for the selection of a contractor, if applicable, including - process for determining necessary expertise - selection of the contractor or contractors, if applicable		
6. Potential civil liability effects, if any, upon the school and the authorizer	YES	225
Community Impact		
Evaluation Criteria: E.C. §47605(c)(7) <i>The petition describes, at minimum</i>	Evalu- ation Standard Met Yes / No	Located on Page(s)
1. How the charter school will not substantially undermine existing school district services, academic offerings, or programmatic offerings	NA	
2. Whether the charter school petition duplicates a program currently offered by the district, and the existing program has sufficient capacity for the pupils proposed to be served within reasonable proximity to where the charter school intends to locate	NA	
Comments by review team: Not applicable. New Petitions only.		

CHARTER SCHOOL PETITION EVALUATION MATRIX

Special Education		
<u>Evaluation Criteria: E.C. §47641(a) and E.C. §47646</u> <i>The petition describes, at minimum</i>	Evaluation Standard Met Yes / No	Located on Page(s)
1. The school's special education structure (3 options) a. charter school will be an independent LEA for special education purposes, or b. charter school will be a school within the district, or c. the charter school will be a SELPA	YES	103
2. How special education services will be provided consistent with SELPA Plan and/or policies and procedures. a. includes a fiscal allocation plan in alignment with the SELPA the charter plans to join	YES	103, 104, App, Budget
3. Affirmation that the charter school will assume full responsibility for appropriate accommodations to address the needs of any student	YES	104
4. Acknowledgment that the charter is responsible for providing special education, instruction and related services to the students enrolled in the school regardless of students' district of residence	YES	103
5. The process for notifying district of residence and authorizing LEA when a special education student enrolls, becomes eligible, ineligible and/or leaves the charter	YES	7, 107
6. The transition to and from a district when a student with an IEP enrolls in or transfers out of the charter	YES	107-109
7. Evidence that the school has consulted with a SELPA, such as a letter from SELPA confirming receipt of application	YES	App 1 MOU
8. Includes the following assurances	YES	
a. the charter will comply with all provisions of IDEA	YES	163, SELPA MOU
b. no student will be denied admission based on disability or lack of available services	YES	112, 113
c. a Student Study Team process will be implemented	YES	91, 106, 124
d. any student potentially in need of Section 504 services will receive such services	YES	7, 113-114
If the charter will not be an independent LEA		
1. Clarifies in charter petition or a Memorandum of Understanding the responsibilities of each party for service delivery, including Referral, Assessment, Instruction, Due Process, Agreements describing allocation of actual excess costs	NA	
2. An assertion that the charter will be fiscally responsible for its fair share of any encroachment on general funds	NA	
If the charter school is an independent LEA within a SELPA		
1. Notifies SELPA Director of intent to participate prior to February 1 of the preceding school year	YES*	103
2. Includes current operating budget in accordance with E.C. §42130 and E.C. §42131	NO	
3. Understands that the charter school is fiscally responsible for fair share of any encroachment on general funds	NO	
4. Asserts responsibility for any legal fees relating to the application and assurances process	YES	108, 109
5. Demonstrates it is located within SELPA's geographical boundaries	YES	App. MOU
6. Asserts all instruction will be in a safe environment	NO*	
7. Affirms the terms of the Agreement will be met regarding the organization, implementation, administration and operation of the SELPA	YES	105, App. MOU

CHARTER SCHOOL PETITION EVALUATION MATRIX

Comments by review team:

- "Safe Environment": There is no specific language defining safe environment in this inclusion model. That term generally refers to emotional safety within a team teaching environment. Based on the number and increase in suspensions especially among SPED students, this may require additional guidance or clarification.
- Reviewers could not locate specific language around charter school fiscal responsibility within the SELPA nor the operating budget for SPED

Required Declarations

<u>Evaluation Criteria: E.C. §47605(c)(6)</u> <i>The petition describes, at minimum</i>	Evaluation Standard Met Yes / No	Located on Page(s)
1. Declaration of whether or not the charter school shall be deemed the exclusive public employer of the employees of the charter school for purposes of Chapter 10.7 (commencing with Section 3540) of Division 4 of Title 1 of the Government Code.	YES	6

Required Affirmations

<u>Evaluation Criteria: E.C. §47605(e)</u> <i>The petition describes, at minimum</i>	Evaluation Standard Met Yes / No	Located on Page(s)
1. Affirmation that the school will be nonsectarian in its - programs - admission policies - employment practices - and all other operations	YES	6
2. Affirmation that the school shall not charge tuition	YES	6
3. Affirmation that the school shall not discriminate against any pupil on the basis of disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained in the definition of hate crimes set forth in Section 422.55 of the California Penal Code	YES	6
4. Affirmation that the admission to a charter school shall not be determined according to the place of residence of the pupil, or of the pupil's parent or legal guardian, within this state, except that an existing public school converting partially or entirely to a charter school under this part shall adopt and maintain a policy giving admission preference to pupils who reside within the former attendance area of that public school	YES	6
<u>5. Affirmation that the charter school shall admit all pupils who wish to attend the charter school</u>	YES	6, 7, 17
6. Affirmation that the school will comply with federal, state and local laws as required for charter schools	YES	8, 9

Comments by review team:

Affirmations were also included at the start of each section

CHARTER SCHOOL PETITION EVALUATION MATRIX

Alternative Education Charter School Criteria

Criteria in RED indicate a description that is required under law to be included in the charter petition.

Criteria in BLACK are strongly suggested to be included to ensure that the charter petition is reasonably comprehensive.

For Alternative Education Charter Schools, If Applicable		
Evaluation Criteria: E.C. §58500 - 58512 <i>The petition describes, at minimum</i>	Evaluation Standard Met Yes / No	Located on Page(s)
1. Acknowledgement that the charter school will maintain an unduplicated count of at least 70% of the school's total enrollment composed of the required high-risk student groups	NA	
2. Assurance that the school will maintain documentation that 70% of students will be reflected on Part 1 of their DASS Participation Form	NA	
4. Clearly articulated mission and purpose to recruit and educate high-risk students	NA	
5. Performance plan that include specific measures and goals for success, including one or two attainable norm references and/or verifiable alternative measures that support the school's mission and vision	NA	
6. Required assurances	NA	
a. the school will maintain documentation that 70% of students will be reflected on Part 1 of their DASS Participation Form, as defined in item 1, above	NA	
b. when applying for other alternative school status, ONLY the school's current enrollment will be used (in accordance with the DASS Eligibility Criteria and examples) to determine a school's percentage of high-risk student for DASS eligibility.	NA	
Comments by review team: SCHS is not an alternative education setting.		

CHARTER SCHOOL PETITION EVALUATION MATRIX

Independent Study Supplemental Criteria

Independent Study/Non-Classroom based Instruction - For Renewals Only (There is a moratorium on the approval of new petitions effective January 1, 2020)		
Evaluation Criteria: <u>E.C. §51745</u> <i>The petition describes, at minimum</i>	Evaluation Standard Met Yes / No	Located on Page(s)
1. an assurance that the K-12 public school guidelines for independent study will be evident in the annual audit per Education Code 47612.5(b)	NA	
2. an assurance that the charter will meet the requirement related to the ratio of ADA to FTE certificated employees as prescribed under Education Code 51745.6(a)	NA	
3. an acknowledgement that independent study will be supervised by an appropriately credentialed teacher per EC 51747.5(a)	NA	
4. an acknowledgement that the charter may claim apportionment credit for independent study only to the extent of the time value of pupil or student work products, as personally judged in each instance by a certified teacher per EC 51747.5(b)	NA	
5. the maximum length of time, by grade level and type of program, that may elapse between the time an independent study assignment is made and the date by which the pupil must complete the assigned work	NA	
6. the number of missed assignments that will be allowed before an evaluation is conducted to determine whether it is in the best interest of the pupil to remain in independent study, or whether he/she should return to a regular school program	NA	
7. an assurance that each written agreement shall be signed, prior to the commencement of independent study, by the pupil, the pupil's parent, legal guardian, or caregiver, if the pupil is less than 18 years of age, the certificated employee who has been designated as having responsibility for the general supervision of independent study, and all persons who have direct responsibility for providing assistance to the pupil	NA	
8. a description of how the required Written Agreement for each pupil will be processed and maintained, including at a minimum the following:	NA	
a. The manner, time, frequency, and place for submitting a pupil's assignments and for reporting his/her progress	NA	
b. The objectives and methods of study for the pupil's work, and the methods utilized to evaluate that work	NA	
c. The specific resources, including materials and personnel that will be made available to the pupil	NA	
d. A statement of the policies adopted pursuant to subdivisions (a) and (b) regarding the maximum length of time allowed between the assignment and the completion of a pupil's assigned work, and the number of missed assignments allowed prior to an evaluation of whether or not the pupil should be allowed to continue in independent study	NA	
e. The duration of the independent study agreement, including the beginning and ending dates for the pupil's participation in independent study under the agreement. No independent study agreement shall be valid for any period longer than one semester, or one-half year for a school on a year-round calendar	NA	
f. A statement of the number of course credits, or, for elementary grades, other measures of academic accomplishment appropriate to the agreement, to be earned by the pupil upon completion	NA	
g. The inclusion of a statement in each independent study agreement that independent study is an optional educational alternative in which no pupil may be required to participate	NA	

CHARTER SCHOOL PETITION EVALUATION MATRIX

Charter School Petition Review Findings of Fact -

Education Code 47605(c)

In reviewing petitions for the establishment of charter schools pursuant to this section, the chartering authority shall be guided by the intent of the Legislature that charter schools are and should become an integral part of the California educational system and that the establishment of charter schools should be encouraged. The governing board of the school district shall grant a charter for the operation of a school under this part if it is satisfied that granting the charter is consistent with sound educational practice and with the interests of the community in which the school is proposing to locate. The governing board of the school district shall consider the academic needs of the pupils the school proposes to serve. The governing board of the school district shall not deny a petition for the establishment of a charter school unless it makes written factual findings, specific to the particular petition, setting forth specific facts to support one or more of the following findings:

- (1) The charter school presents an unsound educational program for the pupils to be enrolled in the charter school.
- (2) The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
- (3) The petition does not contain the number of signatures required by subdivision (a).
- (4) The petition does not contain an affirmation of each of the conditions described in subdivision (e).
- (5) The petition does not contain reasonably comprehensive descriptions of all of the following: [A-O requirements]
- (6) The petition does not contain a declaration of whether or not the charter school shall be deemed the exclusive public employer of the employees of the charter school for purposes of Chapter 10.7 (commencing with Section 3540) of Division 4 of Title 1 of the Government Code.
- (7) The charter school is demonstrably unlikely to serve the interests of the entire community in which the school is proposing to locate. Analysis of this finding shall include consideration of the fiscal impact of the proposed charter school. A written factual finding under this paragraph shall detail specific facts and circumstances that analyze and consider the following factors:
 - (A) The extent to which the proposed charter school would substantially undermine existing services, academic offerings, or programmatic offerings.
 - (B) Whether the proposed charter school would duplicate a program currently offered within the school district and the existing program has sufficient capacity for the pupils proposed to be served within reasonable proximity to where the charter school intends to locate.
- (8) The school district is not positioned to absorb the fiscal impact of the proposed charter school. A school district satisfies this paragraph if it has a qualified interim certification pursuant to Section 1240 and the county superintendent of schools, in consultation with the County Office Fiscal Crisis and Management Assistance Team, certifies that approving the charter school would result in the school district having a negative interim certification pursuant to Section 1240, has a negative interim certification pursuant to Section 1240, or is under state receivership. Charter schools proposed in a school district satisfying one of these conditions shall be subject to a rebuttable presumption of denial



Sacramento Charter High School





Sacramento Charter High School

Charter Renewal Petition For the Term July 1, 2025 – June 30, 2030

**Submitted to
Sacramento City Unified School District
Board of Education
June 28, 2024**

Table of Contents

Letter of Petition Intent	Page 4
Executive Summary of Petition Updates	Page 5
Affirmations and Declaration	Page 6
Introduction	Page 10
Charter Renewal Criteria	Page 27
Element 1 The Educational Program	Page 75
Elements 2 & 3 Measurable Pupil Outcomes and Methods of Measurement	Page 125
Element 4 Governance and Parent Involvement	Page 132
Element 5 Employee Qualifications	Page 141
Element 6 Health and Safety Procedures	Page 151
Element 7 Student Population Balance	Page 161
Element 8 Admission Policies and Procedures	Page 169
Element 9 Annual Independent Financial Audit	Page 176
Element 10 Suspension and Expulsion Procedures	Page 179
Element 11 Staff Retirement Systems	Page 207
Element 12 Attendance Alternatives	Page 209
Element 13 Employee Return Rights	Page 211
Element 14 Dispute Resolution Process	Page 213
Element 15 Procedures for School Closure	Page 217
Miscellaneous Charter Provisions	Page 221
Conclusion	Page 226



Sacramento Charter High School

LETTER OF INTENT

Via Hand Delivery

Sacramento City Unified School District
Board of Education
5735 47th Ave, Sacramento, CA 95824

RE: Formal Application for Charter Renewal for Sacramento Charter High School

Dear Members of the Sacramento City Unified School District Board of Education:

As the Superintendent of St. HOPE Public Schools ("SHPS"), I hereby submit the formal charter petition application ("Petition") to the Sacramento City Unified School District Board of Education ("District Board") for renewal of Sacramento Charter High School's ("Sac High" or "SCHS") Petition for a term of five years from July 1, 2025 through June 30, 2030. SHPS looks forward to working with the District Board and Sacramento City Unified School District ("SCUSD" or the "District") superintendent and staff during the charter renewal process. Please do not hesitate to contact SHPS at any time, should you have any questions or concerns.

Sincerely,

Lisa Ruda
Superintendent,
St. HOPE Public Schools
2315 34th Street
Sacramento, CA 95817
916-649-7900

Cassandra Jennings
Board Chairperson,
St. HOPE Public Schools
2315 34th Street
Sacramento, CA 95817
916-649-7900

EXECUTIVE SUMMARY OF PETITION UPDATES

Charter Petition Component	Updates for 2025–2030 Petition
Element 1	No substantive changes
Element 2	No substantive changes
Element 3	No substantive changes
Element 4	No substantive changes
Element 5	No substantive changes
Element 6	No substantive changes
Element 7	No substantive changes
Element 8	No substantive changes
Element 9	No substantive changes
Element 10	No substantive changes
Element 11	No substantive changes
Element 12	No substantive changes
Element 13	No substantive changes
Element 14	No substantive changes
Element 15	No substantive changes
Miscellaneous Provisions	No substantive changes

Affirmations & Declaration

Sacramento Charter High School ("Sac High," "SCHS," or the "Charter School") and St. HOPE Public Schools ("SHPS"), which operates the Charter School, will follow any and all federal, state, and local laws and regulations that apply to the Charter School, including but not limited to:

- The Charter School shall meet all statewide standards and conduct the student assessments required, pursuant to Education Code Section 60605, and any other statewide standards authorized in statute, or student assessments applicable to students in non-charter public schools. [Ref. Education Code Section 47605(d)(1)]
- The Charter School declares that SHPS shall be deemed the exclusive public school employer of the employees of Sacramento Charter High School for the purposes of the Educational Employment Relations Act. [Ref. Education Code Section 47605(c)(6)]
- The Charter School shall be non-sectarian in its programs, admission policies, employment practices, and all other operations. [Ref. Education Code Section 47605(e)(1)]
- The Charter School shall not charge tuition. [Ref. Education Code Section 47605(e)(1)]
- The Charter School shall admit all students who wish to attend the Charter School, unless the Charter School receives a greater number of applications than there are spaces for students, in which case it will hold a public random drawing to determine admission. Except as required by Education Code Section 47605(e)(2), admission to the Charter School shall not be determined according to the place of residence of the student or that student's parent or legal guardian within the State. Preference in the public random drawing shall be given as required by Education Code Section 47605(e)(2)(B)(i)-(iv). In the event of a drawing, the chartering authority shall make reasonable efforts to accommodate the growth of the Charter School in accordance with Education Code Section 47605(e)(2)(C). [Ref. Education Code Section 47605(e)(2)(A)-(C)]
- The Charter School shall not discriminate on the basis of the characteristics listed in Education Code Section 220 (actual or perceived disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained in the definition of hate crimes set forth in Section 422.55 of the Penal Code, including immigration status, or association with an individual who has any of the aforementioned characteristics). [Ref. Education Code Section 47605(e)(1)]

- The Charter School shall adhere to all provisions of federal law related to students with disabilities, including, but not limited to, the Individuals with Disabilities Education Improvement Act of 2004 ("IDEA"); Section 504 of the Rehabilitation Act of 1973 ("Section 504"); and Title II of the Americans with Disabilities Act of 1990 ("ADA").
- The Charter School shall meet all requirements for employment set forth in applicable provisions of law, including, but not limited to credentials, as necessary. [Ref. Title 5 California Code of Regulations Section 11967.5.1(f)(5)(C)]
- The Charter School shall ensure that teachers in the Charter School hold the Commission on Teacher Credentialing ("CTC") certificate, permit, or other document required for that teacher's certificated assignment. The Charter School may use local assignment options authorized in statute and regulations for the purpose of legally assigning certificated teachers, in the same manner as a governing board of a school district. [Ref. Education Code Sections 47605(l)(1) and 47605.4]
- The Charter School shall at all times maintain all necessary and appropriate insurance coverage.
- The Charter School shall, for each fiscal year, offer at a minimum, the number of minutes of instruction per grade level as required by Education Code Section 47612.5(a)(1)(A)-(D).
- If a pupil is expelled or leaves the Charter School without graduating or completing the school year for any reason, the Charter School shall notify the superintendent of the school district of the pupil's last known address within 30 days, and shall, upon request, provide that school district with a copy of the cumulative record of the pupil, including report cards or a transcript of grades, and health information. If the pupil is subsequently expelled or leaves the school district without graduating or completing the school year for any reason, the school district shall provide this information to the Charter School within 30 days if the Charter School demonstrates that the pupil had been enrolled in the Charter School. [Ref. Education Code Section 47605(e)(3)]
- The Charter School may encourage parental involvement, but shall notify the parents and guardians of applicant pupils and currently enrolled pupils that parental involvement is not a requirement for acceptance to, or continued enrollment at, the Charter School. [Ref. Education Code Section 47605(n)]

- The Charter School shall adhere to each of the conditions in Education Code Section 47605(e)(4)(A)–(D), including: (A) not discouraging a student from enrolling or seeking to enroll in the Charter School for any reason; (B) not requesting a student's records or requiring a parent, guardian, or student to submit the student's records before enrollment; (C) not encouraging a student currently attending the Charter School to disenroll or transfer to another school for any reason; and (D) providing a copy of the California Department of Education ("CDE") notice regarding the requirements in Education Code Section 47605(e)(4)(A)–(D) to a parent/guardian or student if the student is 18 years of age or older: (i) when a parent/guardian or student inquires about enrollment, (ii) before conducting an enrollment lottery, or (iii) before disenrollment of a student. [Ref. Education Code Section 47605(e)(4)(A)–(D)]
- The Charter School shall maintain accurate and contemporaneous written records that document all pupil attendance and make these records available for audit and inspection. [Ref. Education Code Section 47612.5(a)(2)]
- The Charter School shall, on a regular basis, consult with its parents and teachers regarding the Charter School's education programs. [Ref. Education Code Section 47605(d)]
- The Charter School shall comply with any applicable jurisdictional limitations to the locations of its facilities. [Ref. Education Code Sections 47605 and 47605.1]
- The Charter School shall comply with all laws establishing the minimum and maximum age for public school enrollment. [Ref. Education Code Sections 47612(b) and 47610]
- The Charter School shall comply with all applicable portions of the Elementary and Secondary Education Act ("ESEA"), as reauthorized and amended by the Every Student Succeeds Act ("ESSA").
- The Charter School shall comply with the California Public Records Act, Government Code Section 7920.000, et seq. ("CPRA").
- The Charter School shall comply with the Family Educational Rights and Privacy Act, 20 U.S.C. Section 1232g, 34 CFR Part 99 ("FERPA").
- The Charter School shall comply with the Ralph M. Brown Act, Government Code Section 54950, et seq. ("Brown Act").
- The Charter School shall comply with Government Code Section 1090, et seq., as set forth in Education Code Section 47604.1 ("Section 1090").
- The Charter School shall comply with the Political Reform Act, Government Code Section 81000, et seq. ("PRA").

- The Charter School shall meet or exceed the legally required minimum number of school days. [Ref. Title 5 California Code of Regulations Section 11960]

Lisa Marie Ruda

6/28/24

Lisa Ruda

Date

Superintendent
St. HOPE Public Schools





Introduction



Overview of Sac High

Sacramento Charter High School is a mission driven, public, college preparatory, independent charter school that serves students in grades 9–12. Sacramento Charter High School was initially authorized by the Sacramento City Unified School District in 2003 and is currently in its twenty-second year of operation as a charter school. Sacramento High School opened in 1856 and operated as a school of the District through the end of the 2002–03 school year. In Fall, 2023 Sacramento Charter High School opened with the support of parents, educators, community members and the District. Sac High's current campus has been the location for Sacramento High School since 1924, 100 years ago.

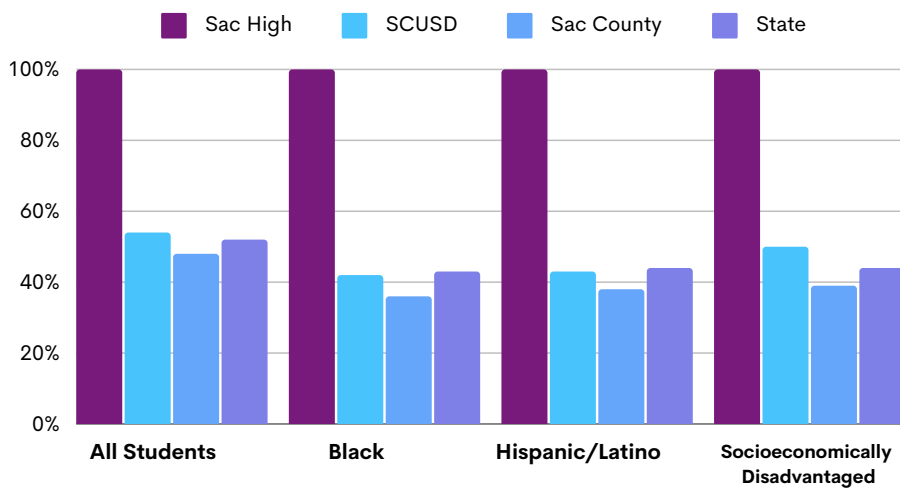
Sac High is operated by St. HOPE Public Schools, a nonprofit, tax-exempt 501(c)(3) California public benefit corporation. SHPS also operates St. HOPE Public School 7 ("PS7") which, like SCHS, is located in Oak Park. PS7's grades 6–8 share a campus with Sac High, while grades TK–5 are located at a facility in the Southwest corner of Oak Park close to Fruitridge Road and Highway 99.

Together, PS7 and Sac High form an education pipeline focused on empowering students to graduate prepared to earn a four-year college degree and to serve as leaders in their chosen communities. The mission of St. HOPE Public Schools and Sac High is the same – to graduate self-motivated, industrious, critically thinking leaders who are committed to serving others, passionate about life-long learning and prepared to earn a degree from a four-year college or university.

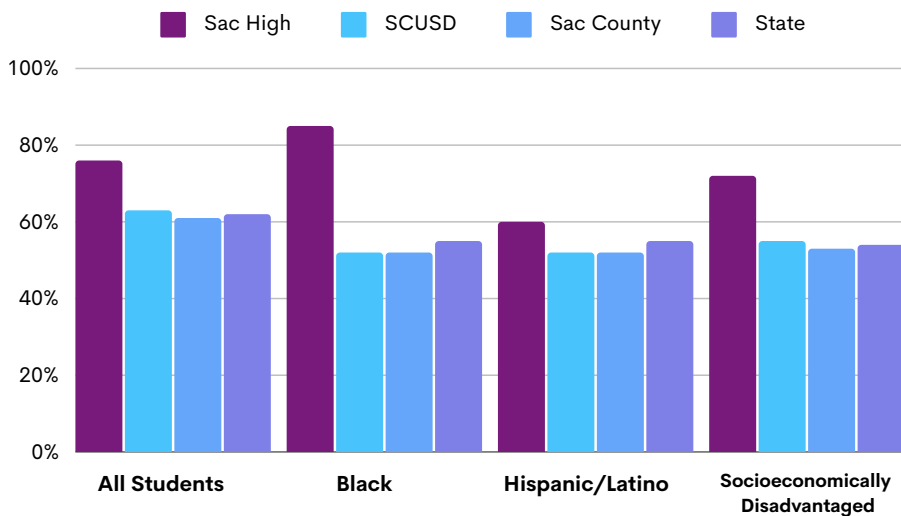
SAC HIGH HAS A SUCCESSFUL PROGRAM WITH PROVEN PRACTICES AND STRONG ACADEMIC RESULTS

Sac High's ultimate measure as a college preparatory high school is how students perform after graduation. This aligns with the District's Equity, Access, and Social Justice Guiding Principle which states, "All students are given an equal opportunity to graduate with the greatest number of postsecondary choices from the widest array of options." The chart below demonstrates the success Sac High alumni have experienced when it comes to enrollment in college, especially when compared to their peers in the District, county and state. The results below are for the Class of 2021 and, for Sac High's socioeconomically disadvantaged students, the Class of 2020. Cumulative data on college attendance rates for seven of Sac High's graduating classes is provided in the Renewal Criteria section of this Petition.

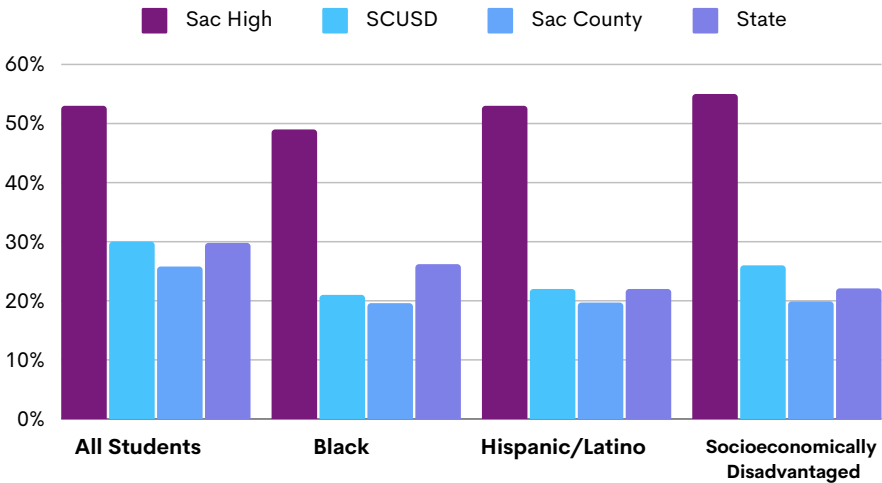
Graduates Meeting UC/CSU Requirements



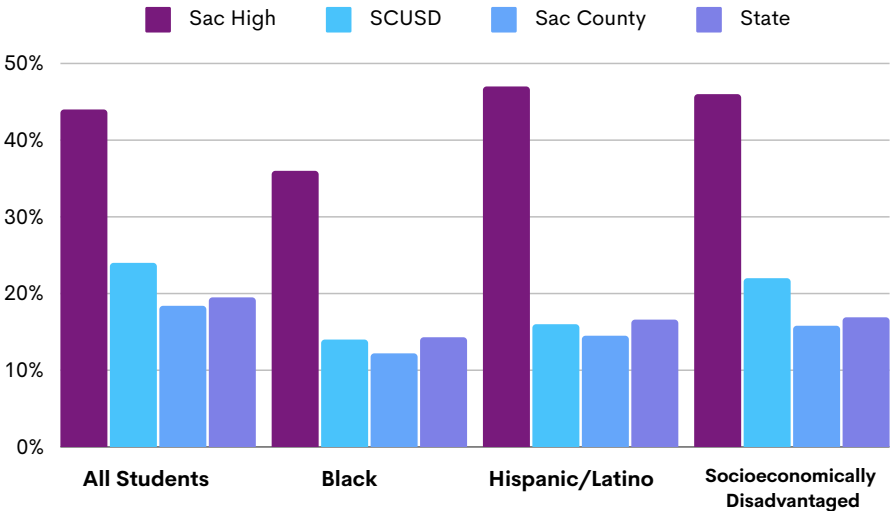
Graduates Attending College



Graduates Attending a Four-Year College



Graduates Attending a UC or CSU Campus



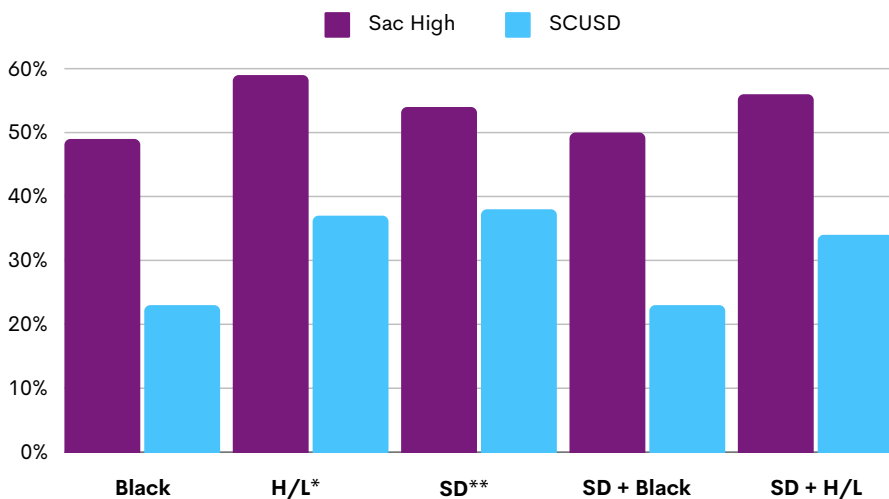
As shown above, Sac High’s students are graduating having met the UC/CSU requirements and enjoying the post-secondary options of attending college. In addition, the results, both schoolwide and broken out by subgroup, demonstrate students at Sac High are far outperforming their peers. Additional achievement data is provided later in this Petition and further reinforces Sac High’s impact on its students in alignment with both the Charter School’s and the District’s intended outcomes.

The success demonstrated above is a result of intentional practices at Sac High as well as hard work from students, families and staff. Some of the key features of Sac High’s program are highlighted below. The Petition also contains additional results and provides a comprehensive description of the required elements of a complete charter petition. Element 1 highlights ten key practices at Sac High that contribute to the results achieved by the Charter School.

While the college enrollment rates are achieved following a student’s graduation from high school, Sac High’s incredibly strong performance on this statistic is an indicator of the successful college going culture the Charter School has created for all students. These efforts are further described in Element 1 of this Petition, but several highlights of Sac High’s college going culture include: graduation requirements aligned with the UC/CSU eligibility requirements (“A-G”); a dedicated college counselor; in-person, on campus dual enrollment, which is expanding to be accessible to all students; multiple college campus visits for all students; advisory where college is the focus for all 12th graders; an annual, on-campus HBCU fair; and, a physical environment designed to promote college as a natural next step following high school.

Beyond the college going culture, Sac High students are also demonstrating success on a key leading indicator of college enrollment, which is performance on the 11th grade CAASPP. While the Renewal Criteria section of this Petition highlights several data points demonstrating Sac High’s strong performance on CAASPP, the table here shows perhaps the most telling indicator of the effectiveness of Sac High’s educational program. Below is a table showing the collective percentage of students scoring at or above grade level (Levels 3 and 4 on CAASPP) for the following testing years: 2018, 2019, 2022 and 2023.

11th graders scoring level 3 or 4 on ELA CAASPP in 2018, 2019, 2022 & 2023



*H/L, Hispanic/Latino

**SD, Socioeconomically Disadvantaged

The college attendance data provided above, as noted, is for only one class of high school graduates, but the Renewal Criteria section of this Petition shows the same statistics for graduates from the classes of 2015 through 2021, cumulatively. The trend in results is similar to the one year of data shown above. Sac High has been serving students and the Oak Park community for over twenty years and the data provided throughout this Petition shows the results of best practices, highlighted in Element One, being consistently applied to an educational program over an extended period of time.

The strong results achieved at Sac High have shown a positive ripple effect across the District, as multiple practices employed by Sac High have resulted in benefits for the District and the students it serves. For example, Sac High has a community service requirement for students. In fall, 2012 one of the community service projects several Sac High students volunteered for during their fall break was a get out the vote campaign for District bond measures Q and R. While Sac High students were not responsible, on their own, for the successful passage of these two bonds, they were the primary get out the vote effort in the District's Trustee Area 7, which is where Sac High is located. These two bonds resulted in tens of millions of dollars in improvements for District facilities which continue to benefit students to this day. Two additional examples of Sac High incubating successful, innovative practices are the Historically Black College and University Fair and the College Track program. While details on both these programs are included below in the highlights section of this Introduction, these are both programs that greatly benefit District students after having been hosted at Sac High for multiple years.

In addition to the strong achievement and programmatic components described above, Sac High has demonstrated incredible resilience over its more than two decades of operation. The Charter School was one of the first large-scale conversions of an urban high school from a District program to an independent charter school. While there were challenges with this transition there were also great gains in student achievement, especially for students from traditionally underserved backgrounds, which continue to this day. In Sac High's first decade the campus' main building underwent a full remodel, stretching across at least three school years, creating significant disruption to the program and to students' learning environments. It was in this setting that Sac High's graduation requirements changed, requiring students to be UC/CSU eligible (A-G). The results on this metric continued to improve, resulting in the 100% UC/CSU eligibility rates observed for the last several classes of graduates. A more recent challenge was the COVID-19 pandemic. Sac High and SHPS responded to this challenge in a similar fashion, ensuring what was best for students came first. The results achieved in 2021-22, which are displayed in the Renewal Criteria section of this petition via the 2022 Dashboard results, demonstrate the success of Sac High's efforts to minimize learning loss over the COVID-19 pandemic.

While the 2022 Dashboard showed strong results at Sac High, the lower 2023 Dashboard performance reflected the unique challenges Sac High faced in the 2022-23 school year. Despite this, student academic performance at Sac High continues to exceed their peers at many other SCUSD schools. Similar to challenges it has faced before, Sac High has not shied away from these results and is doubling down to ensure the focus remains on students and attaining achievement levels that match the expectations Sac High and SHPS have for its programs. To address the gaps observed in the 2022-23 school year, Sac High is investing in its staff with a focus on highly effective teachers, implementing newly adopted curriculum to strengthen the academic program as well as increasing training for adults to improve the culture on campus and increase student attendance while simultaneously reducing suspensions.

Information on these efforts can be found throughout the Petition. The Renewal Criteria section addresses efforts to reduce suspensions, Element One shares next steps with curriculum and Element Five outlines SHPS' steps to attract, hire, develop and retain outstanding educators. Just as it has successfully addressed challenges in the past, Sac High is confident its efforts to confront the current lower performance will see results improve and student achievement return to the high levels reached as recently as 2022.

SHPS, in collaboration with the District as its authorizing partner, established Sac High as a charter school to provide an academic program rivaling the best in Sacramento. Sac High is committed to ensuring all students, especially those who have been traditionally underserved in the public school system, have the opportunity to attend a high-quality, college preparatory high school. A large majority of Sac High's diverse and inclusive student body is composed of socioeconomically disadvantaged students of color – 74.5% in 2023–24. Across the state, region and county, minority and low-income students have struggled to achieve at high levels and have often been denied the choice of a high-quality public education. These are the student groups Sac High is serving and serving well.

Over the last two decades Sac High has made a significant, positive impact on student outcomes. The Charter School has created a safe, orderly, structured and disciplined learning environment complemented by a culture of high expectations and a college-going mindset. Academic achievement has increased over time on multiple metrics. Four-year college acceptance and attendance rates have continued to set the mark for open enrollment, public Sacramento area high schools, as have the percent of graduates meeting University of California ("UC") and California State University ("CSU") "A-G" college entrance requirements. As explained below, Sac High's program and results achieved are meeting the needs of the community served by the Charter School.

As noted, Sac High's population consists almost exclusively of students who identify as Black, Hispanic/Latino, socioeconomically disadvantaged, or a combination of two or more of those three subgroups. These students experience an achievement gap when their results are compared against their White, Asian, and higher income peers across all education outcomes.

This gap exists within the District and has been identified via SCUSD's core value, which states, "We recognize that our system is inequitable by design and we vigilantly work to confront and interrupt inequities that exist to level the playing field and provide opportunities for everyone to learn, grow, and reach their greatness." In addition, the District's guiding principle for equity, access and social justice states, "All students are given an equal opportunity to graduate with the greatest number of postsecondary choices from the widest array of options."









Sac High's academic program compliments both the District's core value and the above guiding principle. The Charter School's target student population are the same students for whom the "system is inequitable" and who most need "to graduate with the greatest number of postsecondary choices." The results achieved by Sac High's students and graduates demonstrate the Charter School is closing the achievement gap and thereby living up to the District's core value and guiding principle. As such, Sac High is a resource for and partner with the District in striving to serve students and families with the best public education possible.

While a more complete analysis of achievement results is included later in this Petition, below are several highlights achieved by Sac High students and the Charter School.

One of the considerations at renewal is whether continuation of the Charter School being open is in the best interest of students. The highlights included below show that renewing the Petition for Sac High is in the best interest of students, and closure would be highly detrimental to students, especially those from traditionally underserved student populations. Additional accomplishments and highlights from the current term of Sac High's charter are included below, in the following section on renewal criteria and throughout the Petition. The acronym DFS is used below and stands for Distance From Standard. This term is further explained in the renewal criteria section of this Petition discussing the California Assessment of Student Progress and Performance ("CAASPP").

English Language Arts Performance

2022 Results (data is included in Appendix A)

-  Schoolwide, as measured by DFS, students at Sac High performed better, on average, against all students tested at the District, in Sacramento County (the "County"), and Statewide.
-  The average student in every qualified subgroup with more than ten test takers at Sac High performed better against the District, County, and State - for every subgroup and every comparison on DFS.
 -  Qualified subgroups at Sac High include Black, Hispanic and socioeconomically disadvantaged students, as well as students with disabilities ("SWD").
-  Between 2019 and 2022 Sac High students showed learning gains in English Language Arts ("ELA"), contrary to trends experienced by the District, the County and the State on DFS.
-  With the exception of West Campus (a school with selective admissions), Sac High outperformed every other District high school, both schoolwide and for all qualified subgroups on DFS.
-  A Black student was more than three times as likely to be on or above grade level at Sac High compared to all District high schools.
-  A Hispanic/Latino or socioeconomically-disadvantaged student was more than two times as likely to be on or above grade level at Sac High compared to all District high schools.
-  The table below shows the 2021-22 performance of Sac High's Black 11th graders compared to the District population of Black 11th graders.

2021-22 RESULTS	SAC HIGH	SCUSD
Number of Black 11th graders enrolled	45	387
Number of Black 11th graders with a score on the ELA CAASPP	45	280
Percent of enrolled students tested	100%	72.4%
Number and percentage of enrolled Black 11th graders scoring level 4 (Standards Exceeded) on the 2022 ELA CAASPP	13 28.9%	9 2.3%
Number of low income Black 11th graders scoring level 4 on the 2022 ELA CAASP	11	5

2023 Results

- Both schoolwide and for all subgroups where Sac High had data, Sac High's DFS was higher than both the District and State.
 - This holds true, other than for the "all student" comparison with the state, when comparing Sac High's results against just 11th graders, which traditionally score higher than tested students in grades 3-8.
- Compared to the District's 12 high school programs on DFS, Sac High was:
 - Highest performing for Black students
 - Second highest performing for Hispanic/Latino students, behind West Campus
 - Third highest performing for socioeconomically disadvantaged students
 - Fourth highest for all students

2018 through 2023

- 49.4% of Black Sac High 11th graders scored on or above grade level on the CAASPP compared with just 23.3% of District 11th graders in this same time frame. When looking only at students scoring above grade level across these same years, Sac High was at 17.1% with the District at just 6%.

Mathematics Performance

2022 Results (data is included in Appendix A)

- ✓ Schoolwide, a student at Sac High performed better, on average, against SCUSD and the County.
- ✓ The average student in all of Sac High’s qualified subgroups outperformed the students in those same subgroups at the District, County, and State, with the exception of SWD.
- ✓ From 2019 to 2022, Sac High students showed lower amounts of learning loss when compared to the District, County, and State.
- ✓ A Black student was more than five times as likely to be on or above grade level at Sac High compared to all District high schools.
- ✓ A Hispanic/Latino or Socioeconomically Disadvantaged student was more than two times as likely to be on or above grade level at Sac High compared to all District high schools
- ✓ The table below shows the 2021–22 performance of Sac High’s Black 11th graders compared to the District population of Black 11th graders.

2021-22 RESULTS	SAC HIGH	SCUSD
Number of Black 11th graders enrolled	45	387
Number of Black 11th graders with a score on the Math CAASPP	45	273
Percent of enrolled students tested	100%	70.5%
Number and percentage of Black 11th graders scoring level 3 on the 2022 Math CAASPP	11 24.4%	11 2.8%
Number of low income Black 11th graders scoring level 3 on the 2022 Math CAASPP	8	6

2023 Results

- Sac High's DFS was higher than SCUSD's result for all grade levels for Black and Hispanic/Latino students
- When looking at only 11th grade results, Sac High's DFS was higher than both SCUSD and the state for both Black and Hispanic/Latino students and higher than SCUSD for socioeconomically disadvantaged students.
- Compared against open enrollment high school only programs, Sac High was the highest performing school for Black students and for Hispanic/Latino students, while being the second highest performing for socioeconomically disadvantaged students and third for all students.
 - This comparison does not include 7th-11th grade campuses or selective admissions high schools.

2018 through 2023

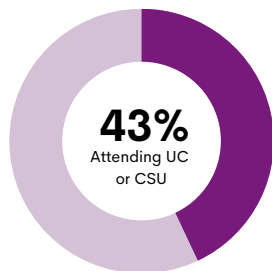
- In this time frame Sac High's average proficiency rate on the 11th grade CAASPP was more than double the District's rate.



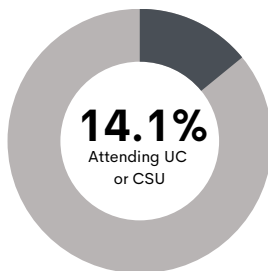
Postsecondary Outcomes

- The 2023 College/Career Indicator ("CCI") shows Sac High:
 - Outperformed both the District and state on status both schoolwide and for every subgroup with more than ten graduates.
 - Had the highest CCI of any program serving high school students for Black students and for students with disabilities.
- For 2023 Sac High had a higher graduation rate for Black students, socioeconomically disadvantaged students and students with disabilities than both the District and the state.
- Sac High hosts a fair for Historically Black Colleges and Universities ("HBCUs") each year on campus. A large majority of Sac High seniors earn on the spot acceptance to college at this fair based on their preparation, test scores and transcript results. Each senior class sees more than half of seniors earn acceptance on the spot at the HBCU fair with some years having a much higher acceptance rate. In addition to acceptance, students frequently earn scholarships and financial aid, both on the spot and following a processing period, based on their application and accompanying academic performance.
 - The HBCU fair is one of multiple examples of collaboration between the Charter School and the District. For several years Sac High hosted the HBCU fair on behalf of the District and all of the District's high schools would bring students to attend the event, free of charge. Currently the District hosts its own HBCU fair and Sac High is proud to have supported this event which became popular enough for both the District and Sac High to individually host.
- For the Class of 2021, 100% of Sac High's Black graduates met the UC/CSU requirements and over 43% went on to attend a UC or CSU. Corresponding numbers in the District were 41.5% met the UC/CSU requirements and 14.1% of graduates attending a UC or CSU. The County was at 36% and 12.2%, respectively.

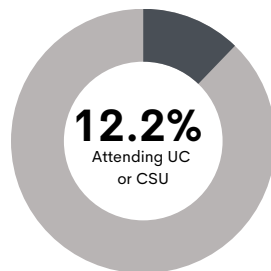
2021 Sac High Black Graduates



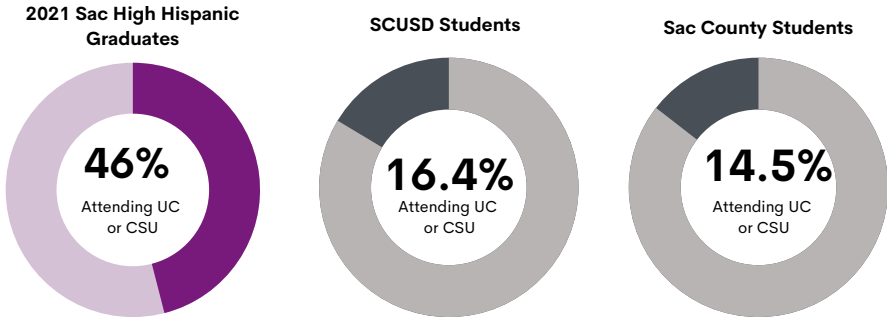
SCUSD Students



Sac County Students



- For Hispanic students in the same class, 100% of Sac High's graduates met the UC/CSU requirements and over 46% went on to attend a UC or CSU. Corresponding numbers in the District were 42.5% met the UC/CSU requirements and 16.4% of graduates attending a UC or CSU. The County was at 38.2% and 14.5%, respectively.



- The San Francisco Chronicle reported that Sac High's Classes of 2021 and 2022 were the only seniors from a public high school without admissions requirements in Sacramento County to have more than 40% of seniors apply to the University of California system and see 80% or more of applicants accepted in both years.
- On February 2, 2023 the Sacramento Bee cited Sac High and West Campus as the only two public high schools in the Sacramento region who were among top schools in sending the highest proportion of graduates to both UC and CSU campuses for the high school Classes of 2019 and 2020.
- As cited by the Sacramento Bee on April 10, 2023, Sac High had the highest acceptance rate to the UC system across all area public high schools without admissions requirements.
 - The articles mentioned above, and others, are provided in the appendix.

Additional Highlights

- In spring of 2023, Sac High and SHPS were recognized for outstanding efforts in closing the education gap and providing all students with access to high-quality education and opportunities by Stanford University's Center for Research on Education Outcomes (CREDO) report, "As a Matter of Fact: The National Charter School Study." CREDO's report cites SHPS, with Sac High as one of two SHPS schools, as being a "gap-busting" CMO in both Reading and Math for the 2015-2019 time frame. In explaining the "gap-busting" term, CREDO stated, on pg. 12 of the report, "Perhaps the most revealing finding of our study is that more than 1,000 schools have eliminated learning disparities for their students and moved their achievement ahead of their respective state's average performance. We refer to these schools as "gap-busting" charter schools."

- Based on its 2019–2023 CAASPP results, Sac High made Educational Results Partnership's "Honor Roll" for California's top performing schools, which recognizes top public schools, school districts and charter schools in California that have outperformed their peers in closing achievement gaps, particularly among higher-poverty and historically disadvantaged student populations.
- The California Charter Schools Association ("CCSA") has recognized Sac High for "Serving Black Students with Excellence" for the Charter School's 2018–19 academic performance.
- The National Action Network ("NAN") named Sac High a California Education Champion.
- Sac High received the Silver Star award for 'Valuing Diversity' from the Association of California School Administrators ("ACSA"), which recognized the Charter School's Inclusion Program that provides all Special Education students with access to rigorous and common core aligned grade-level instruction.
- Sac High has high expectations for all members of the Charter School's community, expectations that are captured in the mission:
 - To graduate self-motivated, industrious, critically thinking leaders who are committed to serving others, passionate about life-long learning, and prepared to earn a degree from a four-year college
- Over half of Sac High's students come from the zip codes immediately surrounding the Charter School's campus and a little over one third come from outside the school district. This shows Sac High is both serving the community where the Charter School is located and is an attractive option for families living further away who choose Sac High for its academic program. There are likely few schools in the District that have managed to attract a higher percentage of students from outside of the school district, although PS7, also run by SHPS, is one of them.
- Data Driven Instruction is a key component of Sac High's program and the academic calendar allows teachers time and space throughout the year to analyze student results, reflect on their practices and create action plans for how to move forward with adjustments to instruction and support for students. The fact that this happens multiple times during each school year allows for student academic progress to be accelerated as adjustments are made in real time.
- Effective Data Driven Instruction cannot happen without sufficient time for Professional Development for teachers. Sac High sets aside time before the school year as well as during the school year for teachers, teacher work days, ongoing professional development at least weekly and, where possible, common planning time. Each year new teachers also receive additional professional development days before school begins.
 - All teachers at Sac High currently receive 21 full days of professional development over the course of a school year, 1.5 hours per week on early release Wednesdays and several half days on early release Fridays for instructional planning.
 - Teachers new to SHPS receive an additional three days of professional development at the start of their first school year, prior to all teachers returning for professional development.

- Sac High's academic program includes additional time for all students above the state's minimum instructional minutes and the impact of this additional time is demonstrated in the results shared here and throughout this Petition. This includes 68 minutes for core classes four days a week along with office hours provided by teachers outside of the school day and a free after school program where tutoring opportunities are included daily.
- This academic program is continuously adjusted based on what will aid students in improving their achievement and readiness for college. One major update is the addition of the Panther Pipeline to Sac High's program, which allows students dual enrollment with Sacramento City College. The Panther Pipeline program at Sac High is the only dual enrollment program in Sacramento where college professors teach onsite and in-person at the high school campus.
- All Sac High students participate in college visits over the course of their time in high school.
- Students, families and staff have the opportunity to participate in decision making at Sac High through student senate, school site council and various other structures in place to facilitate feedback to the Charter School.
- Sac High has expanded its athletic offerings, adding men's volleyball and ladies and men's soccer.
- Sac High's women's basketball team won the Sac-Joaquin Section title in Division 2 in 2019 and the men's basketball team won the Sac-Joaquin Section title in Division 3 in both 2023 and 2024.
- As noted in Element 1 of the Petition, one of the ways Sac High supports students with success in college is the Charter School's partnership with College Track. Originally College Track partnered exclusively with students from Sac High. Now, after several years of having a presence in Sacramento, College Track accepts students from a variety of high schools, including multiple SCUSD high schools. Sac High and SHPS are honored to have incubated the College Track program in Sacramento and proud that this program is now available to students across the community, including those attending District high schools. This expansion of College Track's partner schools fulfills a desire expressed when the program launched in Sacramento and the District, via a letter from then SCUSD Superintendent Jonathan Raymond, expressing support for the program supporting both Sac High students and those from District high schools.

CONCLUSION TO THE INTRODUCTION

Sac High and SHPS look forward to continuing to work in partnership with the District, and other like-minded organizations, to provide a high-quality educational option for the students of Oak Park and Sacramento. Furthermore, Sac High is committed to working with the District throughout this renewal process and will provide additional information as reasonably requested by the District.

The District has previously approved Sac High's Petition for renewal charter terms in 2007, 2012 and 2016. The Petition and supporting documents provided demonstrate that, in addition to Sac High's strong academic program that has led to high student achievement, Sac High is also operationally and fiscally sound and is in compliance with all relevant laws and regulations.

Now, it is based on undeniable results, as well as sustained, strong community interest and support, that St. HOPE Public Schools, in accordance with the Charter Schools Act of 1992 (the "CSA"), hereby petitions the District Board for renewal of the charter term for Sacramento Charter High School. This Petition provides clear evidence that Sac High has far exceeded the charter renewal criteria set forth in Education Code Sections 47607 and 47607.2 and offers a strong educational program. In addition, this Petition and its appendices further demonstrate Sac High is operationally as well as fiscally sound and is in compliance with all relevant laws and regulations.

As required by the CSA, the Petition contains a reasonably comprehensive description of each of the 15 elements identified in Education Code Sections 47605(c)(5)(A)-(O). In addition to the required elements, the Petition includes the appropriate assurances and supplemental materials, referred to as Appendices.

In this Petition, along with two decades of strong results, the Charter School has presented the case for continuing SHPS' mission and furthering Sac High's ultimate purpose – ensuring student achievement at SCHS and success beyond high school. Accordingly, as shown in the following section, titled Renewal Criteria, Sac High has met the criteria for a five year renewal term pursuant to Education Code Sections 47607 and 47607.2(b).



CHARTER RENEWAL CRITERIA

Sac High maintains high expectations for all students and members of the Charter School's community. Ambitious goals are set for academic achievement and all members of the Sac High team and family are held accountable for meeting these goals. Sac High, in partnership with the District, aims to provide all students with the quality of education and schooling available at the highest performing schools in the state and nation. All students and families deserve access to excellent schools and Sac High is providing this option to the children of Oak Park and Sacramento. Sac High's history to date shows its students are achieving and the Charter School is one of the top performing schools in the area.

This section of the Petition summarizes Sac High's performance on various measures of student outcomes. The initial analysis is done against the criteria established by the Education Code for renewal of a charter school. This data shows Sac High meets the criteria for the middle performing track and has earned a five-year renewal. The results reviewed include the California Dashboard indicators and comparisons of Sac High's performance in relation to the District and State, as well as a brief comparison of demographics. These comparisons include schoolwide results and those achieved by subgroups enrolled at the Charter School. Overall, Sac High is outperforming the District on 66% of the available comparison data points on the 2023 Dashboard.

An extensive analysis of ELA and math CAASPP results follows the Dashboard analysis described above. In ELA Sac High shows extremely strong results when compared with both the District and the state. This holds true when looking at both schoolwide and subgroup results. While Sac High is not as high performing in math, the comparisons favor the Charter School when isolating for just 11th grade performance at the subgroup level.

Beyond the Dashboard indicators, Sac High has also demonstrated unprecedented success in college preparation, acceptance and attendance rates. A summary of the results in each area is provided below. The results show definitively that all students, even traditionally underserved subgroups, can achieve at the highest levels and meet ambitious achievement goals if the expectations are high, all stakeholders work relentlessly, and the necessary support is provided to students, families, and staff.

The results show definitively that all students, even those from traditionally underserved subgroups, can achieve at the highest levels and meet ambitious achievement goals if the expectations are high, all stakeholders work relentlessly, and the necessary support is provided to students, families, and staff.

Following the analysis of student outcomes, more detailed information is provided on Sac High's enrollment in comparison with the District and its high school programs. For additional information on Sac High's academic achievement results please refer to Appendix A.

EVIDENCE OF MEETING CHARTER RENEWAL CRITERIA PURSUANT TO EDUCATION CODE SECTION 47607.2(B) (MIDDLE TIER).

Pursuant to the amendments made to Education Code Section 47607, and the creation of Education Code Section 47607.2, by Assembly Bill ("AB") 1505 (2019), at the time of charter renewal, a chartering authority shall consider the performance of the charter school on the state and local indicators reported on the California School Dashboard ("Dashboard"), and, in some circumstances, the performance of the charter school on assessments deemed to be "verified data."

Alongside the shift toward the use of Dashboard data for purposes of evaluating charter schools at renewal, AB 1505 also created a three-tiered system of evaluating charter schools' renewal eligibility, plus a separate category for Dashboard Alternative School Status schools. Each of the three tiers has unique qualifying criteria.

The three performance categories are as follows:

- High Performing – Presumptive renewal if the charter school meets the established renewal criteria—Education Code Section 47607(c)(2).
- Low Performing – Presumptive non-renewal if the charter school meets the non-renewal criteria, unless the chartering authority makes a finding to approve for a two-year term —Education Code Section 47607.2(a).
- Middle Performing – Presumptive renewal unless a chartering authority makes written findings, supported by specific facts, that the charter school failed to meet or make sufficient progress toward meeting standards and closure is in the best interest of students, giving greater weight to measurements of academic performance – Education Code Section 47607.2(b).

For the first time since 2020, the CDE has published a list of high-, middle-, and low-performing charter schools. SCHS is pleased to have been deemed a middle-performing school by the CDE and is thus entitled to a default renewal standard, for a five-year term.



Due to the suspension of the Dashboard in 2020 and 2021, as a result of the COVID-19 pandemic, charter schools could not be placed into performance categories as contemplated by AB 1505. For 2022, the CDE could only display the most current year of data (also known as Status) on the Dashboard. The 2022 Dashboard used one of five Status levels (ranging from Very High (V High), High, Medium, Low, and Very Low (V Low)) for all state indicators based on the 2021-22 school year data.

The 2023 Dashboard is the first since 2019 to display the intended red, orange, yellow, green, and blue performance colors for schools' status and change scores in the state indicators, other than for the College/Career Indicator as noted below.

The state indicators presented on the Dashboard and applicable to a 9-12 grade school include the following:

- Suspension Rate: kindergarten through grade twelve
- English Learner Progress: grades one through twelve
- Graduation Rate: high school only
- Academic: grades three through eight and grade eleven in ELA and Mathematics, based on performance on CAASPP
- The College/Career Indicator ("CCI") - in 2023 CCI is shown as status only, similar to the format used for all indicators on the 2022 Dashboard

Accordingly, Sac High fits into the middle performing category, as determined by law and the California Department of Education, and is eligible, and as clearly demonstrated by the evidence meets the criterion, for charter renewal for a term of 5 years, as shown below.

For middle-performing charter schools, Education Code Section 47607.2(b) mandates that the District consider the performance, schoolwide and for all student subgroups, of SCHS on the state and local indicators on the Dashboard. The District shall provide greater weight to measurements of academic performance, which include the CAASPP ELA and math assessments, the English Learner Progress indicator ("ELPI"), and the College/Career indicator ("CCI").

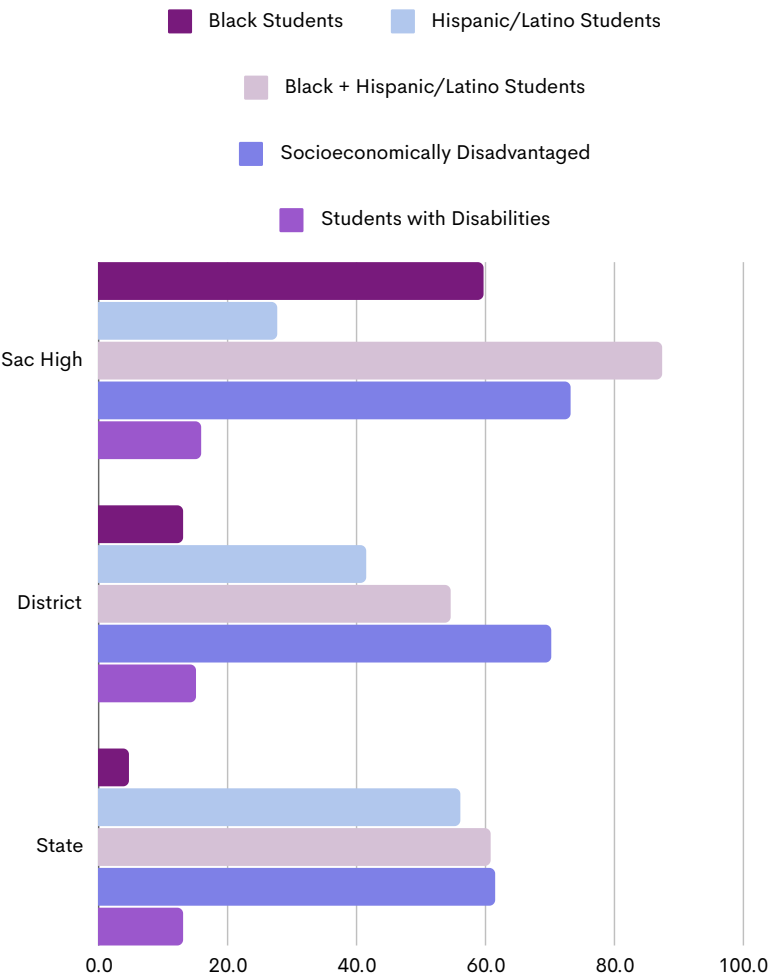
Further, in addition to the state and local indicators on the Dashboard, the District shall also consider evidence, from the assessments deemed verified data by the State Board of Education, showing measurable increases in academic achievement (at least one year's progress for each year in school), or showing strong postsecondary outcomes (college enrollment, persistence, and completion rates equal to similar peers).

SCHS documents its performance on the Dashboard and through verified data, in support of approval of its Petition and renewal charter term, below:

DASHBOARD RESULTS

For reference, Sac High's strong performance as shown below must also be understood within the context of the student population it serves which, in contrast to the State, consists of greater proportions, and significantly greater in the case of Black student enrollment, of historically underserved and marginalized students. As Sac High's data indicates below, particularly at the subgroup level of analysis, students in attendance at Sac High meaningfully outperform their peers. Additional data regarding Sac High's enrollment can be found at the end of this section.

2022 - 2023 Demographics



*2022-23 demographic data is shown as the below results are from the 2023 Dashboard.

The results below, in particular at the subgroup-level, clearly demonstrate the significant academic benefit Sac High provides to students. For example, whereas statewide, African American students consistently perform among the lowest subgroups in ELA and math, the data shows these same students, in attendance at Sac High, achieve at significantly higher levels than they would be expected to perform on average elsewhere.

The following tables display the Charter School’s schoolwide Dashboard results and, in some places for comparison purposes, the District, and the State’s, for the 2022 and 2023 Dashboard years. These are the two Dashboards that, combined, resulted in Sac High being placed in the middle performing track, demonstrating the Charter School has earned a five-year renewal term.

**Schoolwide Dashboard, Comparison of 2022
Status & Performance Levels**

INDICATOR	SAC HIGH	SCUSD	CALIFORNIA
ELA CAASPP DFS (Academic)	45.2 High	- 32.9 Low	- 12.2 Low
Math CAASPP DFS (Academic)	- 74.2 Low	- 69.4 Low	- 51.7 Low
ELPI (Academic)	43.8%* N/A	46% Medium	50.3% Medium
College/Career Indicator (Academic)	87.6% Medium	87.8% Medium	87.4% Medium
Graduation Rate (Academic Engagement)	4.8% Medium	4.9% High	3.1% Medium
Suspension (Conditions and Climate)	16% Red	6.1% Orange	3.5% Orange

*N/A due to having more than ten but fewer than 30 EL students enrolled

There is a more detailed analysis of CAASPP results later in this section. For the other dashboard indicators, as shown above, the Charter School performed on par with the District for ELPI, and schoolwide for graduation rate and suspension. Subgroup comparisons with these last two Dashboard indicators are provided below.

**Schoolwide Dashboard, Comparison of 2023
Status & Performance Levels**

INDICATOR	SAC HIGH	SCUSD	CALIFORNIA
ELA CAASPP DFS (Academic)	-8.6 Orange	-34.8 Orange	- 13.6 Orange
Math CAASPP DFS (Academic)	- 123.5 Red	-67.3 Orange	- 49.1 Orange
ELPI (Academic)	46.2% N/A	43.2% Orange	48.7% Yellow
College/Career Indicator (Academic)	52.1% Medium	33.2% Low	43.9% Medium
Graduation Rate (Academic Engagement)	86.5% Orange	83.8% Orange	86.4% Orange
Suspension (Conditions and Climate)	16% Red	6.1% Orange	3.5% Orange

*N/A due to having more than ten but fewer than 30 EL students enrolled

The 2023 Dashboard results for all students indicate the following: As to ELA, Sac High is outperforming the District and the State as measured by status (DFS). As to ELPI, the Charter School performed slightly above the District and just below the state in the percent of students making progress. Also, Sac High showed an increase from 2022 to 2023 compared to a decline seen by both the District and state. On CCI the Charter School's performance is significantly higher than the District, in both status and performance level, and more than eight percentage points higher than the state. For graduation rate, the academic engagement indicator for high schools, Sac High performed slightly above the District and statistically tied with the state. In summary, Sac High outperformed the District on ELA, ELPI, CCI and graduation rate. The same is true in comparison with the state, other than for ELPI.

Summary 2022 Dashboard comparison: Sac High vs. District

INDICATOR	ALL	BLACK	H/L	SD	SWD
ELA CAASPP DFS (Academic)	Above	Above	Above	Above	Above
Math CAASPP DFS (Academic)	Below	Above	Above	Above	Below
ELPI (Academic)	Below	N/A	N/A	N/A	N/A
Graduation Rate (Academic Engagement)	Below	Above	Below	Above	Above
Suspension (Conditions and Climate)	Below	Below	Below	Below	Equal

Above means Sac High is outperforming the District, other than for suspension rate

When looking across all Dashboard indicators, both schoolwide and for subgroups with results on multiple indicators, Sac High overperformed the District on more than 70% of the comparisons made. The analysis of all Dashboard indicators for the comparisons made in this and the following chart can be found later in this section.



Summary 2022 Dashboard comparison: Sac High vs. State

INDICATOR	ALL	BLACK	H/L	SD	SWD
ELA CAASPP DFS (Academic)	Above	Above	Above	Above	Above
Math CAASPP DFS (Academic)	Below	Above	Above	Above	Below
ELPI (Academic)	Below	N/A	N/A	N/A	N/A
Graduation Rate	Above	Above	Below	Above	Below
Suspension	Above	Below	Below	Above	Above

Above means Sac High is outperforming the state, other than for suspension rate

When looking across all Dashboard indicators, both schoolwide and for subgroups with results on multiple indicators, Sac High overperformed the state on over 60% of the comparisons made.

Summary 2023 Dashboard comparison: Sac High vs. District

INDICATOR	ALL	BLACK	H/L	SD	SWD
ELA CAASPP DFS (Academic)	Above	Above	Above	Above	N/A
Math CAASPP DFS (Academic)	Below	Above	Above	Below	N/A
ELPI (Academic)	Above	N/A	N/A	N/A	N/A
College/Career Indicator (Academic)	Above	Above	Above	Above	Above
Graduation Rate (Academic Engagement)	Above	Above	Below	Above	Above
Suspension (Conditions and Climate)	Above	Above	Above	Above	Above

Above means Sac High is outperforming the District, other than for suspension rate.

When looking across all available 2023 Dashboard indicators, both schoolwide and for subgroups with results on multiple indicators, Sac High overperformed the state on 66% of the comparisons made.



Summary 2023 Dashboard comparison: Sac High vs. State

INDICATOR	ALL	BLACK	H/L	SD	SWD
ELA CAASPP DFS (Academic)	Above	Above	Above	Above	N/A
Math CAASPP DFS (Academic)	Below	Below	Below	Below	N/A
ELPI (Academic)	Below	N/A	N/A	N/A	N/A
College/Career Indicator (Academic)	Above	Above	Above	Above	Above
Graduation Rate (Academic Engagement)	Below	Above	Below	Above	Above
Suspension (Conditions and Climate)	Above	Above	Above	Above	Above

Above means Sac High is outperforming the state, other than for suspension rate.

When looking across all Dashboard indicators, both schoolwide and for subgroups with results on multiple indicators, Sac High overperformed the state on half (50%) of the comparisons made.

DASHBOARD INDICATORS FOR ACADEMIC PERFORMANCE

There is a more detailed analysis of ELA and math CAASPP results later in this section, which are two of the Dashboard indicators. There are two other indicators for academic performance: ELPI and CCI. ELPI, which is an indicator with no subgroups, is noted above. A further analysis of the 2023 CCI is below, including subgroup comparisons. There was no CCI in 2022 so this analysis only includes one year of Dashboard results.

Sac High, SCUSD & State Schoolwide and Subgroup Comparison of 2023 CCI

INDICATOR	SUBGROUP	SAC HIGH	SCUSD	STATE
College/Career Indicator Shows percentage of graduates deemed prepared for college/career	Schoolwide ("All")	52.1% Medium	33.2% Low	43.9% Medium
	African American/Black ("Black")	42.9% Medium	12.6% Low	25.1% Low
	Hispanic/Latino ("H/L")	68.4% N/A*	28.8% Low	35.5% Medium
	Socioeconomically Disadvantaged ("SD")	51.6% Medium	27.4% Low	35.4% Medium
	Students with Disabilities ("SWD")	16.7% N/A*	6.9% Very Low	12.3% Low

*N/A due to having more than ten but fewer than 30 graduates in these subgroups

As shown above, both schoolwide and for every subgroup at Sac High with more than ten graduates, the Charter School outperformed both the District and state on status. Sac High also achieved a higher performance level than the District across all the comparisons above that included a performance level. Data on additional postsecondary outcomes is provided later in this section.

When comparing the 2023 CCI between Sac High and individual District high schools, the following is observed:

- Sac High had the highest CCI of any program serving high school students for Black students and for students with disabilities.
- Sac High was second, behind West Campus*, in the 2023 CCI for Hispanic/Latino students
- When looking at the results for all students and for socioeconomically disadvantaged students, Sac High was fourth and was behind West Campus* and the District's two 7th-12th grade programs.

*West Campus is a selective admissions program that students must apply to and meet specific academic criteria to be accepted.

DASHBOARD INDICATORS FOR ACADEMIC ENGAGEMENT AND CONDITIONS & CLIMATE

Beyond the academic indicators, additional data and analysis is provided below on the two other Dashboard indicators, including results by subgroup. These two indicators are graduation rate, as a measure of academic engagement, and suspension rate as an indicator of conditions and climate at the Charter School.

Sac High, SCUSD & State Schoolwide and Student Subgroup Comparison of 2022 Graduation Rate

INDICATOR	SUBGROUP	SAC HIGH	SCUSD	STATE
Graduation Rate	Schoolwide	87.6% Med	87.8% Med	87.4% Med
	Black	90% Med	84.8% Med	79.5% Low
	Hispanic/Latino	84.8% Med	85.3% Med	85.3% Med
	Socioeconomically Disadvantaged	89.4% Med	86.5% Med	85.1% Med
	Students with Disabilities	75% N/A	74.5% Low	75.2% Low

*N/A due to having more than ten but fewer than 30 seniors in the subgroups

For the 2022 graduation rate, Sac High had a higher graduation rate for both Black and Socioeconomically Disadvantaged students compared to both the District and state. For the schoolwide results and the Hispanic/Latino and Students with Disabilities subgroups, Sac High, the District and the state were all statistically tied as every comparison was within 0.5%.

**Sac High, SCUSD & State Schoolwide and Student Subgroup
Comparison of 2023 Graduation Rate**

INDICATOR	SUBGROUP	SAC HIGH	SCUSD	STATE
Graduation Rate	Schoolwide	86.2% Orange	83.8% Orange	86.4% Orange
	Black	85.7% Orange	74% Red	78.5% Orange
	Hispanic/Latino	80% N/A*	82.1% Orange	84.2% Orange
	Socioeconomically Disadvantaged	86.2% Orange	81.7% Orange	83.7% Orange
	Students with Disabilities	75% N/A*	67% Red	72.7% Orange

*N/A due to having more than ten but fewer than 30 seniors in these subgroups

For graduation rate, when comparing against just the District, Sac High has a higher graduation rate for every comparison made above other than Hispanic/Latino students, which were not a significant subgroup for Sac High's Class of 2023. This trend is true when comparing the Charter School's results against the state except for the schoolwide rate where there was a statistical tie.



Sac High, SCUSD & State Schoolwide and Subgroup Comparison of
2022 Suspension Rate

INDICATOR	SUBGROUP	SAC HIGH	SCUSD	STATE
Suspension	Schoolwide	4.8% Med	4.9% High	3.1% Med
	Black	5.1% Med	12.5% V Low	7.9% High
	Hispanic/Latino	2.5% Med	4.6% High	3.3% Med
	Two or More Races	11.4% V High	5.9% High	2.9% Med
	English Learner	0% N/A	3.4% Med	3.2% Med
	Socioeconomically Disadvantaged	5.1% Med	6.1% High	4% Med
	Students with Disabilities	8.3% High	8.3% V High	5.4% High

In 2022, in comparison with the District, Sac High outperformed or was statistically tied with the District for the schoolwide results and for each subgroup other than for the Two or More Races subgroup.

The largest racial/ethnic subgroup at Sac High is Black students. In addition to the above data, the below chart shows the Black student suspension rate for all District high schools with an enrollment of at least 300 9th–12th grade students and at least 30 Black students enrolled (cumulatively), as well as the District’s suspension rate for 9th– 12th grade Black students. Only the rates for Sac High and the District are identified. As shown in the chart below, Sac High had the lowest suspension rate for Black student across all District high schools within the criteria described in this paragraph.

Black Student Suspension Rate

	SAC HIGH			DISTRICT			
Suspension Rate	5.1%	11.5%	15.3%	15.6%	16.4%	20.2%	21.5%

**Sac High, SCUSD & State Schoolwide and Student Subgroup
Comparison of 2023 Suspension Rate**

INDICATOR	SUBGROUP	SAC HIGH	SCUSD	STATE
Suspension	Schoolwide	16% Red	6.1% Orange	3.5% Orange
	Black	18.5% Red	15.3% Red	8.8% Red
	Hispanic/Latino	11.5% Red	5.9% Orange	3.8% Orange
	Two or More Races	21.6% Red	6.8% Orange	3.3% Orange
	English Learner	5% N/A	4.3% Orange	3.7% Orange
	Socioeconomically Disadvantaged	16.6% Red	7.4% Orange	4.5% Orange
	Students with Disabilities	23% Red	9.3% Red	5.9% Orange

Similar to the analysis of the 2022 suspension rate, the below chart shows the Black student suspension rate for all District high schools with an enrollment of at least 300 9th–12th grade students and at least 30 Black students enrolled (cumulatively), as well as the District’s suspension rate for 9th– 12th grade Black students. Only the rates for Sac High and the District are identified. While Sac High’s suspension rate increased dramatically from 2022, the Charter School still achieved the third lowest suspension rate for Black students in 2023 across the Districts large high schools and was within less than one percentage point of the District’s rate for Black high school students.

Black Student Suspension Rate

		DISTRICT		SAC HIGH			
Suspension Rate	8.7%	17.9%	18.4%	18.5%	18.9%	21.3%	26.2%

As noted in the comparison of schoolwide results, Sac High performed below both the District and state in suspension rate. Reducing suspensions is a priority for the Charter School. The LCAP, included as part of Appendix 2 & 3, notes action steps the Charter School is taking to reduce suspensions.

The steps for reducing suspensions include, but are not limited to, the following efforts. Sac High operates an advisory program where students are assigned to an advisory teacher and class that remains consistent over their four years at Sac high. The intent of advisory is to build a strong school culture and provide students an adult to connect with who is invested in their success. In addition, Sac High hosts multiple family events throughout the school year to facilitate strong relationships with parents, as strong family relationships support students during the school day. Sac High is further looking to reduce suspensions with a focus on keeping students in class and a review, and potential revision, of processes along with ongoing training for all staff to ensure consistency in implementation to reduce the number of scholars violating school rules.

Beyond these efforts, Sac High has invested in additional team members focused on supporting students' ability to emotionally regulate themselves and learn problem solving and coping skills as well as revisiting the Charter School's hands free policy for its campuses. The Charter School has also expanded the duties for staff whose sole focus is safety, mental health and student wellness. SHPS is participating in differentiated assistance activities with the Sacramento County Office of Education ("SCOE") as well as receiving additional training which include the implementation of progressive discipline ladders and corresponding flow charts aimed at keeping students in class by addressing small behavior issues prior to them becoming larger incidents. The Charter School's MTSS team (described in Element 1) meets at least quarterly and discusses training and support needed for staff as well as for individual students. Substance abuse prevention support workshops are part of the menu of supports available to students.

Beyond the LCAP, the description of the educational program in Element 1, along with the information in the beginning of Element 10 (Suspension and Expulsion Procedures), detail actions focused on reducing this rate.

Sac High 2018, 2019 and 2022 and 2023 Dashboard Local Indicators

LOCAL INDICATOR	2018	2019	2022	2023
Basics: Teachers, Instructional Materials, Facilities	Standard Met	Standard Met	Standard Met	Standard Met
Implementation of Academic Standards	Standard Met	Standard Met	Standard Met	Standard Met
Parent and Family Engagement	Standard Met	Standard Met	Standard Met	Standard Met
Local Climate Survey	Standard Met	Standard Met	Standard Met	Standard Met
Access to a Broad Course of Study	Standard Met	Standard Met	Standard Met	Standard Met



As demonstrated above, the Charter School met standards for all local indicators in each of the most recent four years local indicators were reported on the California Dashboard.

CALIFORNIA ASSESSMENT OF STUDENT PERFORMANCE AND PROGRESS DATA

Moving beyond the Dashboard indicators analyzed above, below is an extensive analysis of the ELA and math CAASPP results achieved by Sac High including comparisons with the District and state. ELA and math CAASPP are also academic indicators on the Dashboard.

The State Board of Education has adopted standards to establish what all California children are expected to know and be able to do for particular subjects at particular grade levels, and which are assessed on CAASPP. Based on their scores on CAASPP, students are rated as having "Exceeded", "Met", "Nearly Met", or "Not Met" the standard for ELA and math.

Below is a snapshot of Sac High's CAASPP results. The focus is on 2021-22 and 2022-23 results, but in some cases additional years of data have been provided to show the Charter School's performance over the current term. As noted above, the 2021-22 and 2022-23 school years produced the 2022 and 2023 Dashboards, respectively. These are the two Dashboards that resulted in placing the Charter School in middle track and earned it a five-year renewal term.

The data demonstrates Sac High students achieved measurable increases in academic achievement based on their performance relative to their similarly situated peers. Specifically, insofar as state and District data (and subgroup data) indicate average performance within a school year, where Sac High outperforms those averages, Sac High clearly demonstrates the measurable increases in academic achievement its students have attained.

The CAASPP data shown below primarily uses the Distance From Standard ("DFS") metric to show performance. This metric is different from the more traditional method of viewing CAASPP results, which is the percentage of students scoring at or above grade level (on CAASPP level 3 is considered "Met" or at grade level and CAASPP level 4 is considered "Exceeded" or above grade level).

DFS measures how far a student is from the grade level standard. A DFS of zero means the student is scoring at the minimum scale score to be considered on grade level. A negative DFS means the student has not met the standard while a positive DFS puts the student above the minimum score needed to be at grade level.

The Charter School is mainly using the DFS metric for multiple reasons. First, the Dashboard uses DFS when looking at CAASPP. The dashboard drives accountability for charter schools under AB 1505, as explained above, and so using DFS here aligns with how the state is viewing charter school performance. In addition, DFS measures the performance of all tested students and each individual score is weighted equally. This provides schools an incentive to maximize the academic growth and achievement of every student. When looking at the more traditional metric of percent of students at or above grade level, only students who performed at or above a certain threshold are taken into account.

DFS is not calculated on a county wide basis for the purposes of the Dashboard. As such, only the District and State are included in the below comparisons.

In some cases CAASPP data has been included below to show the percentage of students scoring at or above grade level as well as some data points showing the proportion of students scoring Exceeded, Met and Nearly Met.

2022 ELA CAASPP Performance: Status, Performance Level

SUBGROUP	SAC HIGH	DISTRICT	STATE
Schoolwide	45.2 High	- 32.9 Low	-12.2 Low
Black	39 High	-96.9 V Low	-57.7 Low
Hispanic/Latino	43.2 N/A*	-52.6 Low	-41.4 Low
Socioeconomically Disadvantaged	57.1 High	-60.6 Low	-38.6 Low
Students with Disabilities	- 28.6 N/A*	-116.7 V Low	-97.3 V Low

*N/A means the subgroup had more than 10 but fewer than 30 students, so the subgroup’s status is reported on the Dashboard but it does not have a performance level (color).

The 2022 Dashboard for ELA shows Sac High is outperforming the District and the state in status for all of the comparisons made.

2023 ELA CAASPP Performance: Status, Performance Level

SUBGROUP	SAC HIGH	DISTRICT	STATE
Schoolwide	-8.6 Orange	-34.8 Orange	-13.6 Orange
Black	-14.2 Orange	-91.9 Orange	-59.6 Orange
Hispanic/Latino	29.1 N/A*	-54.6 Orange	-40.2 Orange
Socioeconomically Disadvantaged	-13.8 Orange	-61 Orange	-42.6 Orange

Despite every performance level being orange on the above chart, the data shows Sac High is outperforming the District and the state in status for all of the comparisons made.

2022 Math CAASPP Performance: Status, Performance Level

SUBGROUP	SAC HIGH	DISTRICT	STATE
Schoolwide	-74.2 Low	-69.4 Low	-51.7 Low
Black	-84.3 Low	-139.5 V Low	- 106.9 V Low
Hispanic/Latino	-65.8 N/A*	- 92.2 Low	- 83.4 Low
Socioeconomically Disadvantaged	-73.4 Low	- 96.3 V Low	-84 Low
Students with Disabilities	- 148.3 N/A	-147.3 V Low	- 130.8 V Low

The 2022 math results show the Charter School underperforming compared to the District and state when comparing results for all students and for Students with Disabilities. However, Sac High is well above the District's results for Black, Hispanic/Latino and Socioeconomically Disadvantaged students.

2023 Math CAASPP Performance: Status, Performance Level

SUBGROUP	SAC HIGH	DISTRICT	STATE
Schoolwide	-123.5 Red	-67.3 Orange	-49.1 Orange
Black	-130.1 Red	-132 Orange	-104.5 Red
Hispanic/Latino	-88.9 N/A*	-91.2 Orange	-80.8 Orange
Socioeconomically Disadvantaged	-125.4 Red	-93 Yellow	-80.8 Yellow



Contrary to 2023 ELA, the 2023 math results above show the Charter School underperforming compared to the state. Sac High is just above the District’s results for Black and Hispanic/Latino students. Sac High’s scores are for 11th graders, as that is the only grade level tested in high school, while the District’s results are for all grades tested. A comparison of 11th grade only results is included below.

The data tables below show results for ELA and Math. For both subjects, comparisons are provided first against the District and State results for all tested students and then a comparison for just 11th graders is shown.

ELA Data, Sac High Compared to All Grade Levels Tested

2022 Distance From Standard: ELA CAASPP

SUBGROUP	SAC HIGH	SCUSD*	SAC HIGH ABOVE?	STATE	SAC HIGH ABOVE?
Schoolwide	45.2	- 32.9	Above	-12.2	Above
Black	39	-96.9	Above	63	Above
Hispanic/Latino	43.2	-52.6	Above	42.9	Above
Socioeconomically Disadvantaged	57.1	-60.6	Above	-38.6	Above
Students with Disabilities	- 28.6	-116.7	Above	-97.3	Above



2023 Distance From Standard: ELA CAASPP

SUBGROUP	SAC HIGH	SCUSD	SAC HIGH ABOVE?	STATE	SAC HIGH ABOVE?
Schoolwide	-8.6	-34.8	Above	-13.6	Above
Black	-14.2	-91.9	Above	-59.6	Above
Hispanic/Latino	29.1	-54.6	Above	-40.2	Above
Socioeconomically Disadvantaged	-13.8	-61	Above	-42.6	Above

As demonstrated above, based on the 2022 and 2023 Dashboard results for the ELA CAASPP, the Charter School outperformed the District and the State in the DFS achieved for every subgroup with more than ten test takers in addition to the results for all students.

ELA data, Sac High Compared to 11th grade

Statewide students in 11th grade score higher on the ELA CAASPP compared to K-8 students. In 2023 11th graders across the state are estimated to have scored more than 20 points higher on DFS compared to the statewide average for all students based on published CAASPP results. Given that 11th graders are the only students taking CAASPP at Sac High, it is also a valid comparison to look at 11th grade only scores across Sac High, the District and the state. The comparative results still show Sac High outperforming the District and state despite the trend of higher scores for 11th graders in ELA.

2022 Distance From Standard: 11th grade ELA CAASPP

SUBGROUP	SAC HIGH	SCUSD*	SAC HIGH ABOVE?	STATE*	SAC HIGH ABOVE?
Schoolwide	45.2	-33.3	Above	6.5	Above
Black	39	-93	Above	-71.3	Above
Hispanic	43.2	-54.4	Above	-22.2	Above
Socioeconomically Disadvantaged	57.1	-58.8	Above	-22.9	Above
Students with Disabilities	- 28.6	-135.4	Above	-112	Above

*Estimates based on CAASPP data¹

2023 Distance From Standard: 11th grade ELA CAASPP

SUBGROUP	SAC HIGH	SCUSD*	SAC HIGH ABOVE?	STATE*	SAC HIGH ABOVE?
Schoolwide	-8.6	-40.1	Above	7.4	Below
Black	-14.2	-91.6	Above	-45.9	Above
Hispanic	29.1	-63.5	Above	-20.5	Above
Socioeconomically Disadvantaged	-13.8	-58.2	Above	-21.3	Above

*Estimates based on CAASPP data

Similar to the comparison with state averages for all students, in 2022 and 2023 Sac High's 11th graders outperformed their 11th grade peers across the District and state in the DFS achieved for every subgroup with more than ten test takers. When looking at all students, Sac High outperformed the District and the state in 2022 but only the District in 2023.

¹Estimates calculated by finding the difference between the average scale score for 11th graders on the ELA CAASPP, displayed at <https://caaspp-elpac.ets.org/caaspp/>, and the lowest possible scale score for level 3, Standard Met. This is how DFS is calculated on the Dashboard. The estimate does not apply the Dashboard rules for continuous enrollment or the penalty for testing fewer than 95% of students.

2023 ELA Performance Comparisons

When comparing the 2023 ELA CAASPP results between Sac High and 12 individual District high schools (this comparison did not look at alternative or DASS high school programs), as well as compared to the District, county and state, the following is observed.

- On DFS compared to SCUSD’s high school programs, Sac High was:
 - highest performing for Black students
 - second highest performing for Hispanic/Latino students, behind West Campus
 - third highest performing for socioeconomically disadvantaged students
 - fourth highest for all students
- For the percent of students scoring levels 3 + 4, compared to SCUSD’s 12 high school programs, Sac High was:
 - highest performing for Black students and for socioeconomically disadvantaged Black students
 - third highest performing for socioeconomically disadvantaged Hispanic/Latino students
 - fourth highest performing for Hispanic/Latino students
 - fifth highest performing for socioeconomically disadvantaged students
- For all the subgroups included above, Sac High outperformed the District, county and state when looking at both all student performance and 11th grade only results, except for statewide results for 11th grade socioeconomically disadvantaged students



ELA Learning Loss

The CAASPP was not administered in 2020 and was not taken by all students in 2021. Comparing results from 2019 to 2022 showed a trend of a decline in achievement across the state. This was not the case at Sac High.

	SAC HIGH	DISTRICT	STATE
Change in DFS, 2019 to 2022	+11.1	-11.5	-9.7

As shown above, Sac high's DFS increased from the pre-COVID results of 2019. This is contrary to the trend seen in the DFS of the District and state, both of which decreased

ELA Performance Over Time

Over the current charter term there have been four administrations of the CAASPP for which there are publicly available, comparable results: 2018, 2019, 2022 and 2023. Over that period of time Sac High's largest subgroups have been Black, Hispanic/Latino and Socioeconomically Disadvantaged students. The charts below identify cumulative performance on the CAASPP across the four years noted for these subgroups, comparing the Charter School against the District using the percent of students scoring level 3 or 4. Also included is the performance of students who qualify in two of the subgroups (Black and SD as well as Hispanic/Latino and SD).

Black 11th Graders

	% SCORING LEVEL 3 + 4	% SCORING LEVEL 4
Sac High	49.4%	17.1%
SCUSD	23.3%	6%

Hispanic/Latino 11th graders

	% SCORING LEVEL 3 + 4	% SCORING LEVEL 4
Sac High	58.7%	21.5%
SCUSD	36.8%	12.4%

Socioeconomically Disadvantaged 11th graders

	% SCORING LEVEL 3 + 4	% SCORING LEVEL 4
Sac High	54%	18.9%
SCUSD	38.4%	13.3%

Black, Socioeconomically Disadvantaged 11th graders

	% SCORING LEVEL 3 + 4	% SCORING LEVEL 4
Sac High	50%	17.9%
SCUSD	23.3%	5.7%

Hispanic/Latino, Socioeconomically Disadvantaged 11th graders

	% SCORING LEVEL 3 + 4	% SCORING LEVEL 4
Sac High	55.9%	21.6%
SCUSD	33.9%	10.5%

The data above demonstrates the consistent performance, year over year, of the Charter School in relation to the District and reinforces the positive impact of the educational program in place.

Math data, Sac High Compared to All Grade Levels Tested

2022 Distance From Standard: Math CAASPP

SUBGROUP	SAC HIGH	SCUSD*	SAC HIGH ABOVE?	STATE*	SAC HIGH ABOVE?
Schoolwide	-74.2	-69.4	Below	-51.7	Below
Black	-84.3	-139.5	Above	- 106.9	Above
Hispanic	-65.8	- 92.3	Above	- 83.4	Above
Socioeconomically Disadvantaged	-73.4	- 96.4	Above	-84	Above
Students with Disabilities	- 148.3	-147.5	Below	- 130.8	Below

*Estimates based on CAASPP data

The 2022 math results above show the Charter School’s subgroups overperformed compared to their peers in the District and across the state, other than for Students with Disabilities.

2023 Distance From Standard: Math CAASPP

SUBGROUP	SAC HIGH	SCUSD	SAC HIGH ABOVE?	DIFFERENCE W/ STATE	SAC HIGH ABOVE?
Schoolwide	-123.5	-67.3	Below	-49.1	Below
Black	-130.1	-132	Above	-104.5	Below
Hispanic	-88.9	-91.2	Above	-80.8	Below
Socioeconomically Disadvantaged	-125.4	-93	Below	-80.8	Below

*Estimates based on CAASPP data

The 2023 math results above show the Charter School underperforming compared to the state. Sac High is just above the District’s results for Black and Hispanic/Latino students. As noted, these results show the achievement of all tested students in the case of the District and state, however Sac High’s results are only for 11th graders. Next is a comparison of only 11th grade results.

Math Data, Sac High Compared to 11th grade

Contrary to ELA, statewide students in 11th grade score lower on the Math CAASPP compared to K-8 students. In 2023 11th graders across the state scored over 33 points lower on DFS compared to the statewide average for all students, based on an estimate from published CAASPP results. A comparison of 11th grade only results on the Math CAASPP is provided below. As shown, the comparative results are stronger for Sac High given the trend of lower scores for 11th graders in math across the state.

2022 Distance From Standard: 11th grade Math CAASPP

SUBGROUP	SAC HIGH	SCUSD*	SAC HIGH ABOVE?	STATE*	SAC HIGH ABOVE?
Schoolwide	-74.2	-114.9	Above	-83.5	Above
Black	-84.3	-180.5	Above	-147	Above
Hispanic	-65.8	-141.8	Above	-123.2	Above
Socioeconomically Disadvantaged	-73.4	-139.6	Above	-120.9	Above
Students with Disabilities	-148.3	-221.7	Above	-201.3	Above

*Estimates based on CAASPP data

In contrast with the 2022 Math results comparison against all grade levels, when Sac High’s 2022 math DFS is compared against only their 11th grade peers in the District and across the state, Sac High out performs both schoolwide and in comparison with every subgroup.

2023 Distance From Standard: 11th grade Math CAASPP

SUBGROUP	SAC HIGH	SCUSD*	SAC HIGH ABOVE?	STATE*	SAC HIGH ABOVE?
Schoolwide	-123.5	-123.4	Below	-82.6	Below
Black	-130.1	-177.8	Above	-145.1	Above
Hispanic	-88.9	-149.9	Above	-121.5	Above
Socioeconomically Disadvantaged	-125.4	-142.7	Above	-119	Below

*Estimates based on CAASPP achievement data²



² See footnote 1.

Similar to the comparison with state averages for all grade levels, in 2023 Sac High's 11th graders did not outperform their 11th grade peers across the District and state when looking at the performance of all students, although there was less than a one point difference with the District. However, when looking at just 11th grade results, Sac High out performed the District for all three subgroups where there was data and outperformed two out of three subgroups in comparison with the state.

2023 Math Performance Comparisons

When comparing the 2023 Math CAASPP results between Sac High and 12 individual District high schools (this comparison also did not look at alternative or DASS high school programs), as well as compared to the District, county and state, the following is observed:

- On DFS compared to SCUSD's high school programs, Sac High was
 - second highest performing for Black students
 - third highest performing for Hispanic/Latino students
 - fourth highest performing for socioeconomically disadvantaged students
 - sixth highest for all students
- When compared against open enrollment high school only programs, the numbers above, respectively, shift to Sac High being first for Black students, first for Hispanic/Latino students, second for socioeconomically disadvantaged students and third for all students
- For the percent of students scoring levels 2 + 3 + 4, compared to SCUSD's open enrollment high school only programs, Sac High was
 - highest performing for Black students and second highest for socioeconomically disadvantaged Black students
 - second highest performing for Hispanic/Latino students and for socioeconomically disadvantaged Hispanic/Latino students



Math Learning Loss

Similar to ELA, comparing results from 2019 to 2022 showed a trend of a decline in achievement across the state in math DFS. The change in DFS is shown below.

	SAC HIGH	DISTRICT	STATE
Change in DFS, 2019 to 2022	-4.2	-20.7	-18.2

As shown above, all three entities saw a decline in results, yet Sac high's decrease was far less compared to both the District and state.

Math Performance Over Time

The data below is in a similar format as above in the section showing ELA data over time and includes comparisons with the same subgroups over the 2018, 2019, 2022 and 2023 CAASPP administrations. The charts below identify cumulative performance on the CAASPP across the four years noted for these subgroups, comparing the Charter School against the District using the percent of students scoring level 3 or 4.

Black 11th graders

	% SCORING LEVEL 3 + 4
Sac High	16.4%
SCUSD	7.1%

Hispanic/Latino 11th graders

	% SCORING LEVEL 3 + 4
Sac High	20.7%
SCUSD	13.7%

Socioeconomically Disadvantaged 11th graders

	% SCORING LEVEL 3 + 4
Sac High	17.4%
SCUSD	16.9%

Black, Socioeconomically Disadvantaged 11th graders

	% SCORING LEVEL 3 + 4
Sac High	16.8%
SCUSD	6.3%

Hispanic/Latino, Socioeconomically Disadvantaged 11th graders

	% SCORING LEVEL 3 + 4
Sac High	20.6%
SCUSD	11.8%

The data above demonstrates the consistent performance, year over year, of the Charter School in relation to the District and reinforces the positive impact of the educational program in place.

MEASURABLE INCREASES IN ACADEMIC PERFORMANCE

For charter schools in the middle track, authorizers have the following requirement:

(3) In addition to the state and local indicators, the chartering authority shall consider clear and convincing evidence showing either of the following:

(A) The school achieved measurable increases in academic achievement, as defined by at least one year's progress for each year in school.

(B) Strong postsecondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers.

(4) Subparagraphs (A) and (B) of paragraph (3) shall be demonstrated by verified data . . .

"Verified data" is defined in statute as "data derived from nationally recognized, valid, peer-reviewed, and reliable sources that are externally produced." (Education Code Section 47607.2(c)(1).)

In order to show measurable increases in academic performance, Sac High has provided results below on postsecondary outcomes as displayed on the State's Dataquest website. In November of 2020 the California State Board of Education ("SBE") approved multiple "Postsecondary Indicator Data Sources" and Dataquest's College-Going Rate was one of the sources approved. While Sac High has included the data source that fits with the verified data requirements, which is Dataquest's College-Going Rate, additional metrics are also included (e.g. percent of graduates who met the UC/CSU requirements).

The threshold set by the state, as cited above, is that the Charter School needs to show strong postsecondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers. Based on the available data, Sac High has far exceeded this standard and thus meets the criteria for charter renewal.



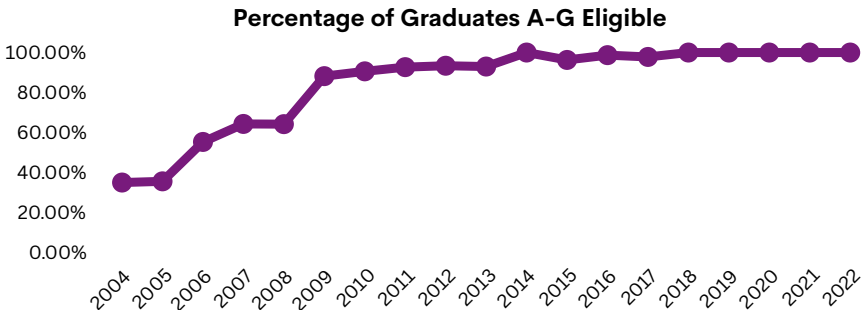
One of Sac High's greatest accomplishments in its first twenty years of operation is the establishment and maintenance of a college-going culture, which is readily apparent in the annual percent of graduates who meet the UC/CSU requirements, four-year college acceptance and college attendance rates that now follow two decades of graduating seniors.

Many of Sac High seniors are first generation college attendees. In 2023-24 48.7% of Sac High students came from households with parents with no college education. Across the region and nation there are few, if any, schools graduating college bound, low-income students of color on the same scale as Sac High.

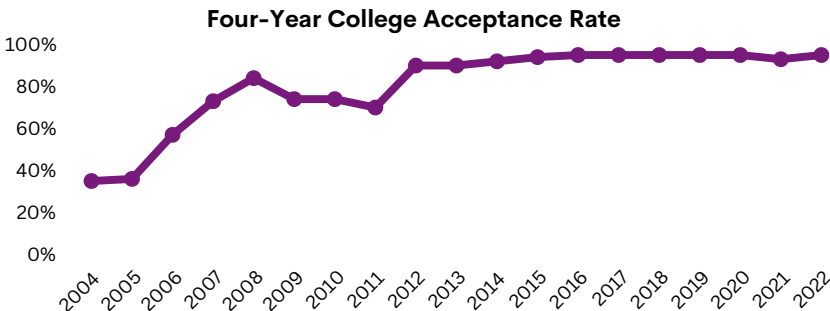
Sac High's strong college eligibility, acceptance and attendance rates are displayed in the charts below. Sac High is proud of the recognition it has received, including recent articles in the Sacramento Bee highlighting the achievement of the Charter School's graduates. Relevant articles and stories from the Sacramento Bee and other local media outlets are included in the appendix (note this appendix item includes links to television clips or other online sources). Several of these media sources indicate that the trends shown below, which provide data through the Class of 2021, will continue for additional Sac High graduating classes.

PERCENT OF GRADUATES MEETING THE UC/CSU REQUIREMENTS

In order to be considered for acceptance to the University of California or California State University institutions of higher learning, students are required to successfully complete a set of college preparatory courses, termed "A-G requirements." Students must earn a grade of "C" or higher and each course is certified by California's public university systems. Prior to SHPS' opening of Sac High as a charter school, only 39% of graduates in the Sacramento High School Class of 2003 were "A-G" eligible, meaning they graduated having met the UC/CSU eligibility requirements. Sac High's class of 2023 had 100% of graduates meet this requirement and, as shown below, the results have improved dramatically over time.



In addition to being eligible for a four-year college, prospective students must also apply and be accepted. Sac High invests significant resources, as outlined in Element One of this Petition, to support students and families to successfully apply and earn acceptance to a range of four-year colleges and universities.



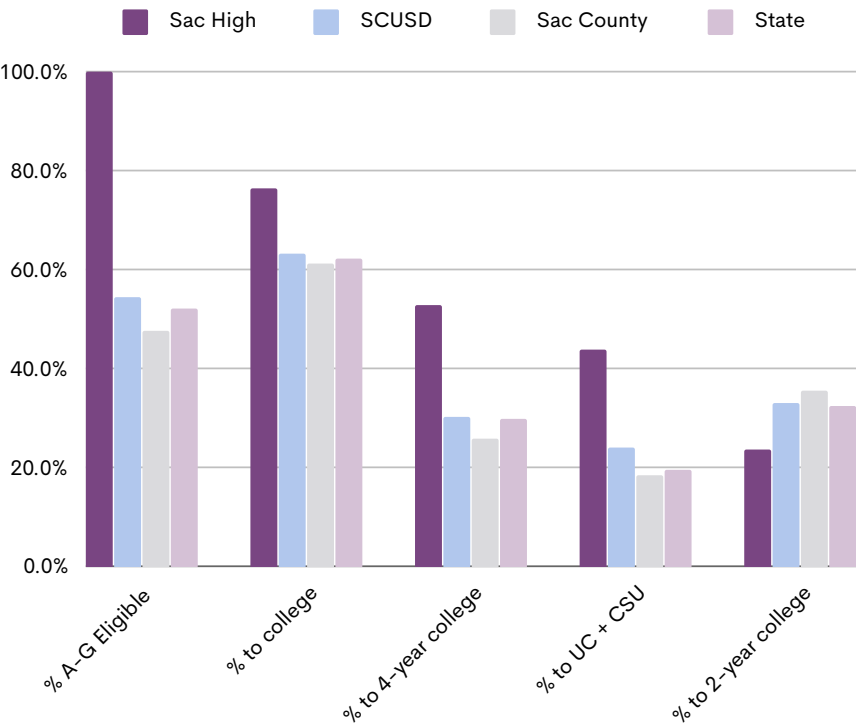
However, just eligibility for and acceptance to a four-year college or university are not enough. Sac High’s mission includes students attending and succeeding in college. The State recently released results showing college attendance for seven cohorts of high school graduates. Similar to the CAASPP data shared above, the college attendance data shows the value add Sac High has delivered to its students as they attend college at far higher rates than their peers. The charts below first look at just the Class of 2021. Then the data is shown for the cumulative results of seven successive classes of high school graduates to demonstrate Sac High’s sustained success over time in supporting students to ultimately attend college.

POSTSECONDARY OUTCOMES DATA CHARTS

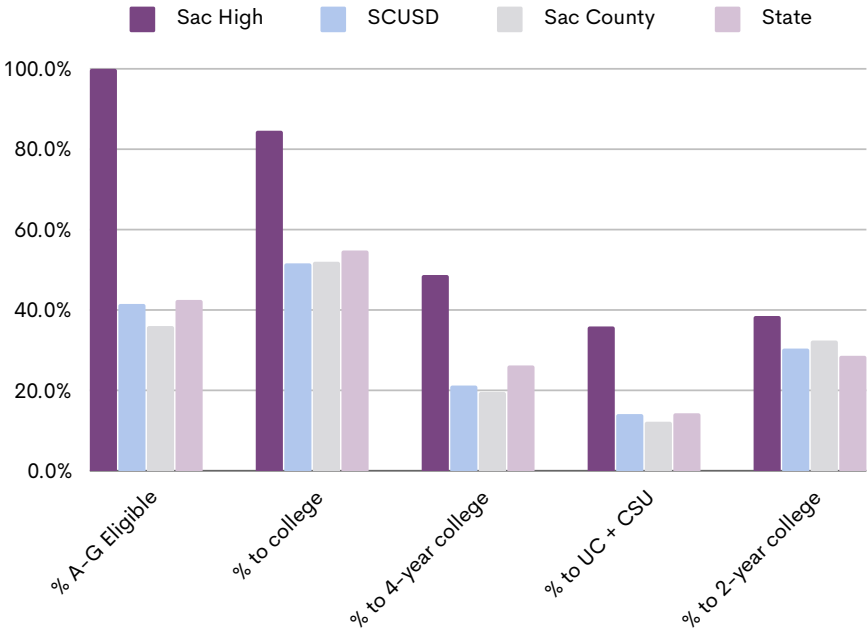
Sac High Postsecondary Outcomes Comparison, Class of 2021

The below charts show student enrollment in colleges and universities following high school graduation. Both the UC and CSU are included. These two systems are part of the data set provided by the State and they are widely considered two of the finest systems of public universities across the county.

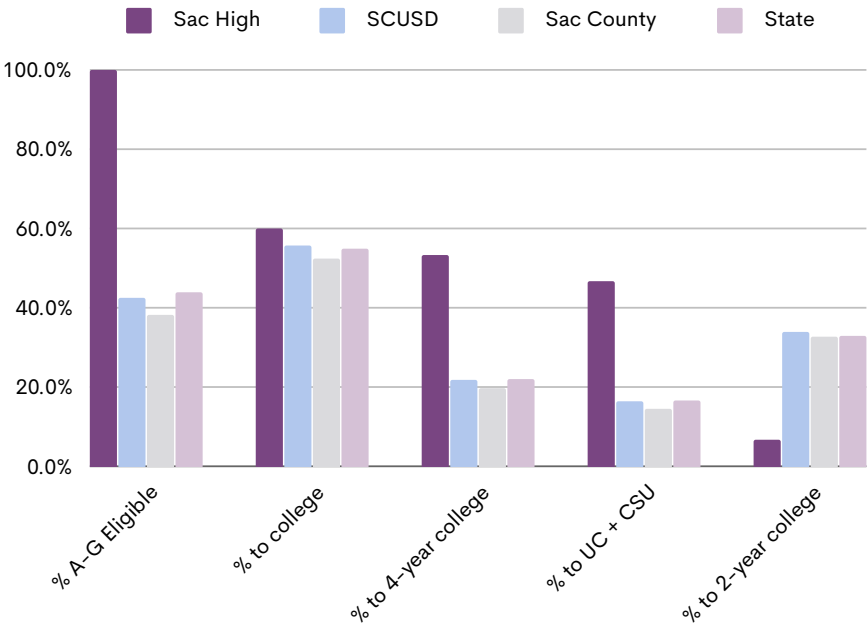
All Students, Class of 2021



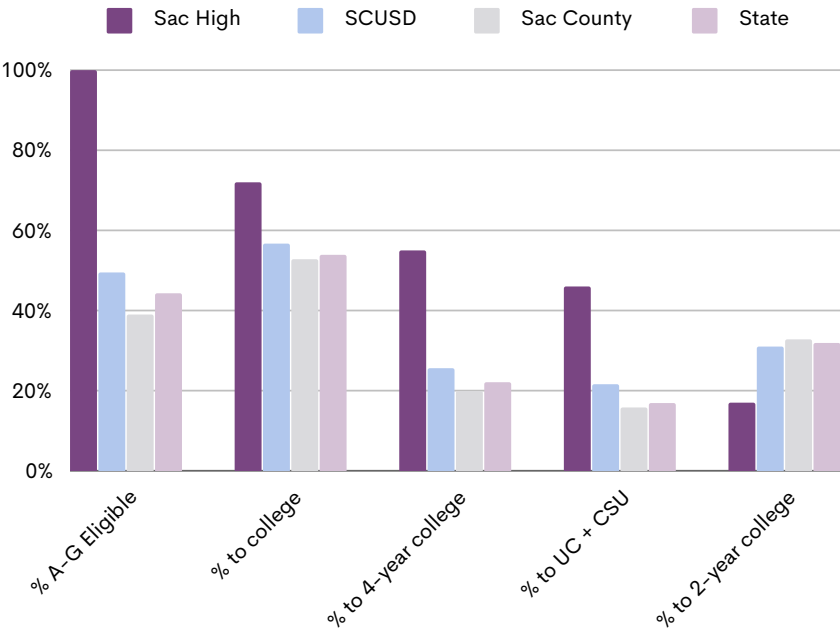
Black Students, Class of 2021



Hispanic/Latino Students, Class of 2021



Socioeconomically Disadvantaged (“SD”) Students, Class of 2021



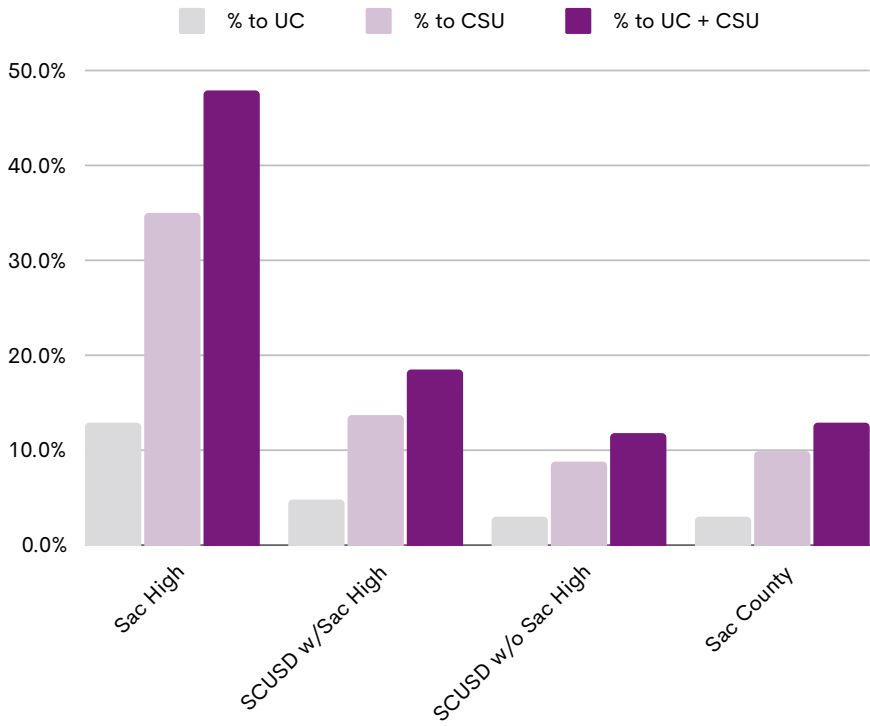
*Sac High numbers are for the Class of 2020 as results were not publicly posted by CDE on Dataquest for the Class of 2021 beyond racial/ethnic subgroups.



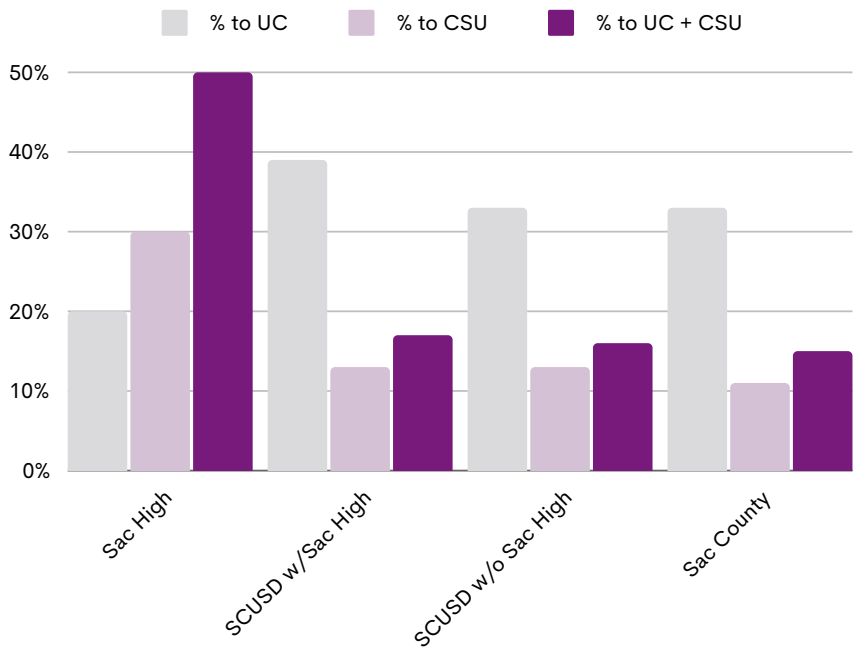
Sac High Postsecondary Outcomes, Class of 2015 through 2021 graduates

Note: The results below for the District include Sac High’s results. If Sac High graduates were removed from the District’s numbers then the percentages would drop, as shown below.

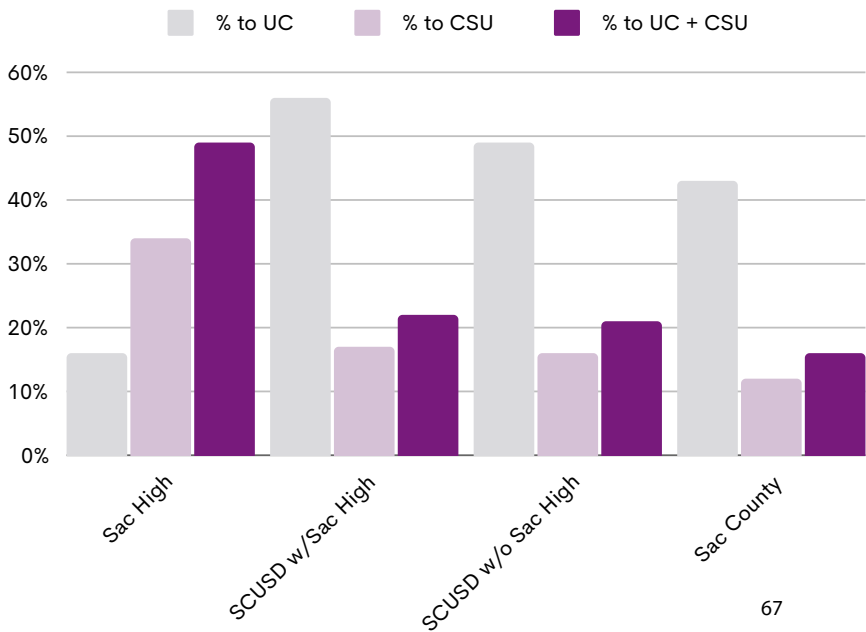
Black Students, Class of 2015-2021



Hispanic Students, Class of 2015-2021



Socioeconomically Disadvantaged ("SD") students, Class of 2015-2020



Sac High Postsecondary Outcomes, Disproportionality of Graduates Attending UC + CSU

Sac High is one of 13 non-DASS high school programs in the District, and one of approximately 70-plus non-DASS high schools in the County. As such, the Charter School has a small proportion of the graduates when compared to both the District and the County. Yet, SCHS is producing far more of the students who go on to attend the UC and CSU system than its percentage of the overall student population. This overperformance is shown below and accounts for students across seven cohorts of high school graduates.

Black Students

% OF STUDENTS GRADUATING FROM SAC HIGH	EXPECTED % OF UC + CSU ATTENDEES	ACTUAL % OF UC + CSU ATTENDEES	DISPROPORTIONALITY*
18.6% vs. SCUSD's total	18.6%	48%	258.2%
4% of Sac County's total	4%	14.9%	371%

*The disproportionality means Sac High produced 258.2% of the Black graduates who went on to a UC or CSU compared to what it should have graduated given the percent of district enrollment the Charter School had for Black students. With 18.6% of the District's Black graduates over seven years, Sac High should have also had 18.6% of the District's Black graduates attending UC + CSU, but it had 48% of these students. 48% is 258.2% of 18.6%. Similar disproportionalities are shown below.

Hispanic Students

% OF STUDENTS GRADUATING FROM SAC HIGH	EXPECTED % OF UC + CSU ATTENDEES	ACTUAL % OF UC + CSU ATTENDEES	DISPROPORTIONALITY
3.7% vs. SCUSD's total	3.7%	10.6%	286.5%
0.7% vs. Sac County's total	0.7%	2.5%	357.1%

Socioeconomically Disadvantaged Students*

% OF STUDENTS GRADUATING FROM SAC HIGH	EXPECTED % OF UC + CSU ATTENDEES	ACTUAL % OF UC + CSU ATTENDEES	OVERPERFORMANCE
5.7% vs. SCUSD's total	5.8%	12.7%	219%
1.1% vs. Sac County's total	1.1%	3.4%	309%

*Results are only for six cohorts of graduates – 2015 through 2020

Sac High Enrollment Data

Prior to discussing the Dashboard and other results provided above in this section, some context was given for Sac High’s student population in comparison to the District and state, as these were two entities being compared against the Charter School. Additional enrollment data is provided here including the enrollment of other District high schools, the subgroups at District high schools, particularly in regard to significant subgroups for Dashboard indicators, as well as stability rate. This additional data provides further context around Sac High’s results and continues to reinforce the value experienced by students at the Charter School from the academic program they experience.

For example, when looking at only 11th grade results on 2023 ELA DFS (above), Sac High had an average of -8.6 and SCUSD of -40.1, yet Sac High achieved this result with an 11th grade that looks much different compared to the District’s 11th grade, as seen below. If the Charter School’s students performed at the averages achieved by their peers across the District, county and state, the Charter School would be performing well below the District average, which is for all students, given the composition of the Sac High student body. Instead of performing on average, Sac High students are scoring significantly above the results achieved by their peers.

2023-24 Grades 9-12 Enrollment of SCUSD non-DASS High School Programs

SCHOOL	GRADES	ENROLLMENT	% AA	% H/L	% SD	% SWD
C.K. Mc McClatchy	9-12	2,481	7.9%	43.7%	60.1%	12.4%
John F. Kennedy	9-12	1,888	19.2%	35%	65.1%	17.6%
Hiram Johnson	9-12	1,627	10.7%	51.6%	84.2%	18.9%
Luther Burbank	9-12	1,574	17.4%	46.4%	84.4%	21.8%
Rosemont	9-12	1,515	15.8%	36.4%	66.7%	21.6%
West Campus	9-12	881	2%	27%	46%	2.6%
Sac High	9-12	355	57.5%	27.3%	74.9%	15.5%
School of Engineering and Sciences*	7-12	291	7.9%	53.6%	63%	11.5%
The MET Sacramento Charter High School	9-12	221	10.9%	43.4%	52.5%	21.7%
Arthur A. Benjamin Health Professions High School	9-12	185	17.8%	53%	67%	24.3%
Umoja (Kit Carson) International Academy*	7-12	182	13.1%	45.1%	71%	19.2%

George Washington Carver School of Arts & Sciences	9-12	178	8.4%	37.1%	52.8%	33.1%
New Technology High School	9-12	152	14.5%	66.4%	80.9%	17.1%

*For 7-12 schools only 9-12 enrollment is shown



2022-23 Dashboard Subgroups

SCHOOL	ELA/MATH			CCI/GRADUATION RATE			
	AA	H/L	SD	AA	H/L	SD	SWD
C.K. McClatchy	Y	Y	Y	Y	Y	Y	Y
John F. Kennedy	Y	Y	Y	Y	Y	Y	Y
Hiram Johnson	Y	Y	Y	Y	Y	Y	Y
Luther Burbank	Y	Y	Y	Y	Y	Y	Y
Rosemont	Y	Y	Y	Y	Y	Y	Y
West Campus	N/A	Y	Y	N/A	Y	Y	N/A
Sac High	Y	10+	Y	Y	10+	Y	10+
School of Engineering and Sciences*	Y*	Y*	Y*	N/A	Y	Y	N/A
The MET Sacramento Charter High School	N/A	10+	10+	N/A	10+	Y	N/A

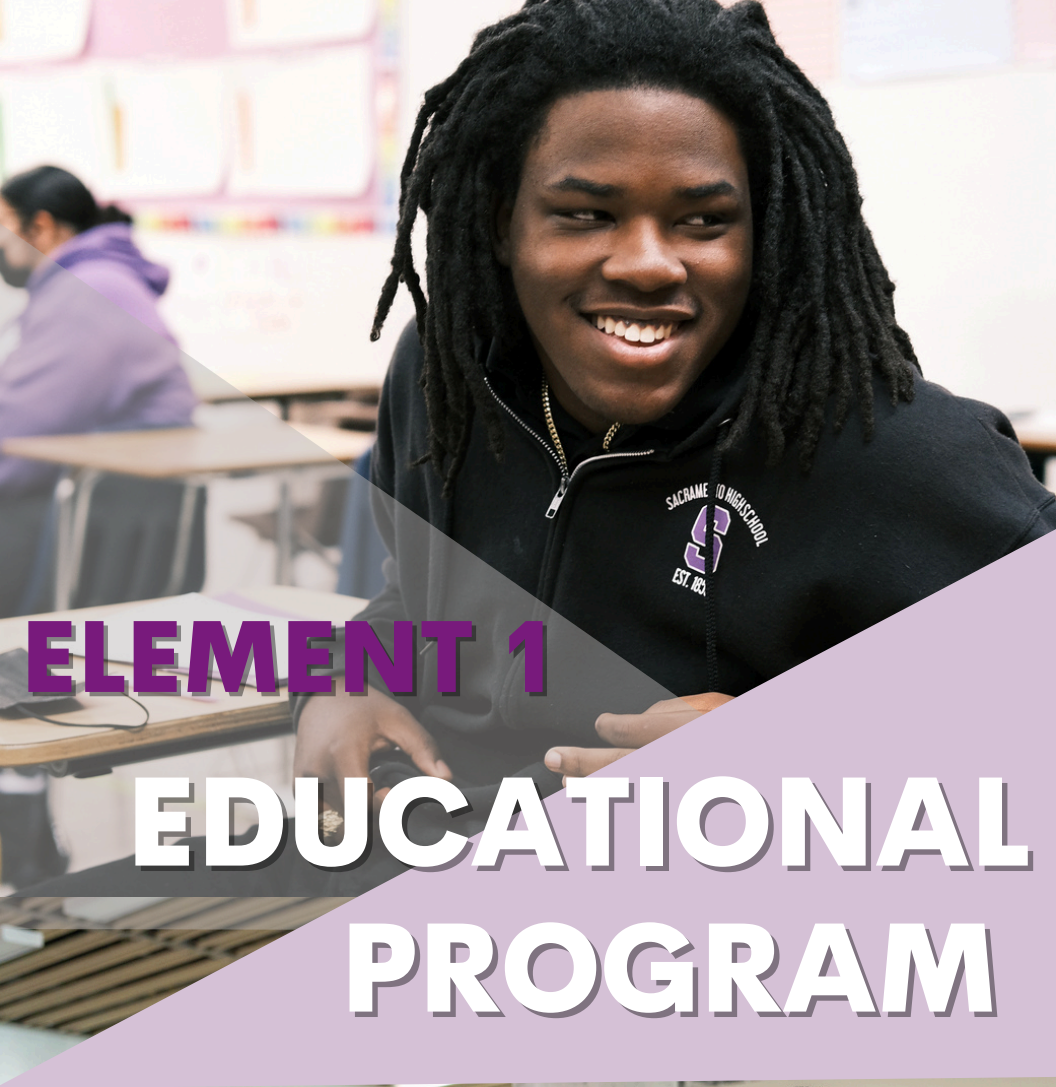
Arthur A. Benjamin Health Professions High School	N/A	Y	Y	10+	10+	Y	10+
George Washington Carver School of Arts & Sciences	N/A	10+	10+	N/A	10+	Y	10+
Umoja (Kit Carson) International Academy*	Y*	Y*	Y*	N/A	10+	10+	N/A
New Technology High School	N/A	10+	10+	N/A	10+	10+	N/A

Y = Subgroup of 30+ students
 10+ = Subgroup of more than 10, fewer than 30
 N/A = Subgroup of 10 or less, no results report
 Y* = Subgroup present across all tested students in grades 7, 8 & 11



Conclusion

In summary, as demonstrated in this section of the Petition, the following is clear. Sac High meets the criteria for and has earned a five year renewal. The Dashboard results achieved by the Charter School compare favorably against the District and the state, especially when looking at the results achieved by subgroups. Diving into CAASPP data, the comparisons continue to demonstrate Sac High's strong performance as a result of its academic programs. Finally, the postsecondary outcomes achieved by Sac High graduates demonstrate the tremendous value the Charter School adds to the community and, most importantly, the students and families enrolled.



ELEMENT 1

EDUCATIONAL PROGRAM



ELEMENT 1: EDUCATIONAL PROGRAM

Governing Law: The educational program of the charter school, designed, among other things, to identify those whom the charter school is attempting to educate, what it means to be an “educated person” in the 21st century, and how learning best occurs. The goals identified in that program shall include the objective of enabling pupils to become self-motivated, competent, and lifelong learners. Education Code Section 47605(c)(5)(A)(i).

The annual goals for the charter school for all pupils and for each subgroup of pupils identified pursuant to Section 52052, to be achieved in the state priorities, as described in subdivision (d) of Section 52060, that apply for the grade levels served, and specific annual actions to achieve those goals. A charter petition may identify additional school priorities, the goals for the school priorities, and the specific annual actions to achieve those goals. Education Code Section 47605(c)(5)(A)(ii).

If the proposed charter school will serve high school pupils, the manner in which the charter school will inform parents about the transferability of courses to other public high schools and the eligibility of courses to meet college entrance requirements. Courses offered by the charter school that are accredited by the Western Association of Schools and Colleges may be considered transferable and courses approved by the University of California or the California State University as creditable under the “A” to “G” admissions criteria may be considered to meet college entrance requirements. Education Code Section 47605(c)(5)(A)(iii).



VISION

Sac High's vision is to become one of the finest urban public high schools in America.

By doing so, Sac High aims to prove that, when given access to a high quality education, all youth can and will achieve at the same level, if not higher, than the highest achieving ethnic and socioeconomic subgroups in the nation. By working in partnership with parents, teachers, staff, and community members, Sac High provides 9th–12th grade students in Oak Park and Sacramento with a college preparatory education that readies them for success in the 21st century. Specifically, the Charter School provides students with the skills, knowledge and abilities needed to excel in and graduate from the nation's most rigorous colleges and universities and compete for selective employment opportunities. Students also receive an education that empowers them to be community leaders and instills within them a sense of civic responsibility as reflected in the Sac High motto, "Service for others." These aims are reflected in Sac High's mission statement.

MISSION

Sac High has created a learning environment where students, staff and parents strive to achieve a standard of excellence in academic achievement, ethics, and citizenship. Specifically, Sac High embraces the following mission statement, which mirrors that of SHPS and serves as the foundation of both schools within the St. HOPE Public Schools system:

The mission of Sac High is to graduate self-motivated, industrious, critically thinking leaders who are committed to serving others, passionate about life-long learning, and prepared to earn a degree from a four-year college.

Within St. HOPE Public Schools, which provides an educational continuum for students from transitional-kindergarten through grade 12, Sac High has created a learning environment for grades 9–12 where students, faculty and parents embrace accountability and strive to achieve a standard of excellence in academic achievement, character, and citizenship.

Sac High also adheres to the "Five Pillars" originally developed by the Knowledge is Power Program ("KIPP"). The Five Pillars (High Expectations, Choice and Commitment, More Time, Focus on Results, and Power to Lead) guide the operation of Sac High, functioning as the values by which the Charter School serves and interacts with students and their families. A more detailed description of the Five Pillars may be found in Appendix 1.

**TARGET POPULATION & WHOM THE CHARTER SCHOOL IS
ATTEMPTING TO EDUCATE**

Sac High utilizes a site-based model to serve students in grades 9–12 who are diverse in ethnicity, socio-economic background, culture, and language. As illustrated in the introduction section of this Petition, the student body is predominantly low-income, minority students and is inclusive of students with a wide range of abilities, including those with special education needs and those who are English Learners ("EL").

While open to all students in the state of California, Sac High primarily targets students and families living within the District, with approximately two thirds of the current student body residing within the District's boundaries. Sac High provides the youth of Oak Park (the neighborhood where the Charter School is located) and surrounding communities that make up south Sacramento with a high-quality educational option. Sac High strives to increase the diversity of its student body to become even more reflective of the surrounding community and the District. Appendix A provides a detailed description of Sac High's current student population.

2023-24 DISTRIBUTION OF STUDENTS BY GEOGRAPHY

RESIDING IN NINE ZIP CODES* IN PROXIMITY TO SAC HIGH	RESIDING IN SCUSD	RESIDING OUTSIDE OF SCUSD
51%	63.3%	36.7%

*The nine zip codes are: 95811, 95814, 95816, 95817, 95818, 95820, 95822, 95823, 95824 - residential data taken from Sac High's 2024-25 Prop 39 application.

**2023-24 DEMOGRAPHIC COMPARISON, SUBGROUPS AS A
PERCENTAGE OF THE POPULATION**

	SAC HIGH	SCUSD	SAC COUNTY	STATE
BLACK	57.5%	12.7%	9.9%	4.9%
AI/AN	1.1%	0.5%	0.4%	0.4%
ASIAN	1.1%	17%	17.9%	9.9%
FILIPINO	0.3%	1.3%	2.5%	2.2%
HISPANIC/LATINO	27.3%	41.8%	32.3%	56.1%
PACIFIC ISLANDER	0.6%	2.1%	1.3%	0.4%
WHITE	2%	16.3%	26.7%	20.3%
TWO + RACES	10.1%	8%	8.3%	4.6%
ENGLISH LEARNER	7%	19.7%	18%	18.4%
FOSTER YOUTH	0.8%	0.3%	0.3%	0.5%
HOMELESS YOUTH	5.4%	2.3%	3.7%	3.6%
STUDENTS WITH DISABILITIES	15.5%	15.9%	13.6%	13.7%
SOCIO- ECONOMICALLY DISADVANTAGED	74.9%	70.5%	62.1%	62.7%

As shown above, Sac High serves a diverse student population and has an overrepresentation of several traditionally underserved student groups in comparison to the District, county and state. In the chart Sac High has the highest percentage of students who identify as Black, as well as the highest combined percentage of students identifying as Black or Hispanic/Latino. In addition, Sac High serves a high percentage of unduplicated pupils who qualify as Socioeconomically Disadvantaged. Further, 2023-24 saw the highest population of English Learners at Sac High in at least the last seven years. The Charter School's cohort of students with disabilities is on par with the District and above both the county and state. Finally, the Charter School has seen a sharp increase in the population of homeless students and families choosing to attend. The 2023-24 homeless population at Sac High more than tripled from the prior year and now makes up over five percent of enrollment. Overall, the student body at the Charter School is a reflection of the community it serves and will continue serving into the next charter term.

Sac High seeks to serve an expanding population of students and to increase the diversity of the Charter School's student body so it becomes even more representative of the surrounding community and the District.

AN EDUCATED PERSON IN THE 21ST CENTURY - PROFILE OF A SAC HIGH GRADUATE

Sac High believes an educated person in the 21st Century will be a unique individual, a student who is industrious, thinks critically, and is motivated to lead social change – a student who walks with a sense of purpose and has their head held high. By the time they graduate, Sac High students:

- Have been accepted into a four-year college or university;
- Have met the UC and CSU "A-G" subject requirements;
- Have taken standardized exams (e.g., CAASPP and Advanced Placement ("AP") tests) and demonstrated with their results that they are prepared for success in college;
- Have participated in at least two extracurricular activities (athletics included);
- Have visited at least two colleges or universities;
- Have completed at least 110 hours of community service; and
- Have taken and passed an AP or college-level course.



In order to attain the vision and mission described above, Sac High has developed a school model of how learning best occurs that is reflective of research-based best practices from high performing, excellent schools across the country as well as lessons learned over the last two decades of operation. Currently, Sac High is a college preparatory high school where all students take courses directly aligned to the UC/CSU eligibility requirements (A-G) so they exit Sac High ready and eligible to be admitted and enroll directly into a four-year college or university.

Sac High has identified a core set of instructional and school design elements that serve as the foundation for the Charter School's model. A description of the current elements in place follows and supplemental information is provided in the appendices.

1. Personalization;
2. College-Going Culture;
3. Structured, Orderly Learning Environment;
4. Rigorous, Standards-Based Curriculum and Instruction;
5. Data Driven Instruction;
6. Extended Time for Learning;
7. Structured Interventions and Support;
8. Leadership Development and Community Service;
9. High Quality Professional Development; and
10. Parent and Community Involvement.

To implement this model, Sac High operates with one school culture, one set of academic standards, and one common set of expectations. Curriculum and instructional programs are aligned campus wide and are managed and supported by the principal and administration. Discipline, attendance, facilities and operations are also handled campus-wide, as are student activities such as athletics and student government.

1. Personalization. Students thrive in environments where they have meaningful relationships with peers and adults, they are known by name, and where teachers know students' individual strengths and weaknesses and are able to modify instruction accordingly. Sac High employs a number of strategies to personalize the learning environment and create a sense of community. These strategies include:

- **Advisory Class.** Each student is assigned to a grade-level advisory group of ideally no more than 25 students. Students attend weekly advisory meetings with their advisor throughout their four years at Sac High. The focus of advisory is academic guidance and character development through leadership and service, college preparation, and preparation for assessments and exams such as the CAASPP and ACT. Advisors are advocates for their students and the primary contact for parents. A key component of advisory is supporting student's social emotional learning and ensuring they have an adult on campus they feel comfortable with and who they can form a positive relationship with throughout their four years. Additional information regarding Advisory is located in Appendix 1.
- **Individualized Learning Plans.** Each student at Sacramento Charter High School has an Individualized Learning Plan, which is a document that outlines their completed and not yet completed A–G courses required for graduation, as well as the credits earned and not yet earned. The Academic Counselor completes the Individualized Learning Plan for each student, which remains in the student's file. The counselor updates the document with each student during check-ins throughout the school year. This document guides the counselor and the student on the courses needed for the upcoming years or summer school in case the student needs to get back on track. Students in the 9th and 10th grade complete the document in credit workshops led by the Academic Counselor and Student Services Coordinator. Families receive the Individualized Learning Plan during conferences as additional resources on their child's progress. The Individualized Learning Plan provides students with a framework by which they can take ownership of their academic achievement.
- **Modified Block Schedule.** Currently, all classes are 68 minutes long four-days-a-week and 41 minutes long on Wednesdays. Most core subjects are taught for the entire year. This extended time in class provides for a greater degree of personalization, allowing teachers to make deeper connections with students and their families.
- **Communication.** All teachers are provided email addresses for teacher-parent-student communication as needed. Students and parents are encouraged to contact teachers, are provided each teacher's email address and can communicate via Infinite Campus. This ensures both students and parents have at least two avenues of communication. Students also provide their parents with a grade report, showing their grades for all classes, every week. Parents must sign and return the report to their child's advisory teacher at the Charter School after it is received.
- **Counseling Team.** Sac High also employs counselors and support staff whose primary focus is to provide academic and social support to students, working closely with advisors to ensure students are on track for graduation and college. Counselors also offer social and psychological support to students as needed. Due to Sac High having a lower student-to-staff ratio, in comparison with most large high schools, students at Sac High are able to receive more individualized support.

2. College-Going Culture. Sac High believes all students should graduate prepared to earn a degree from a four-year college, and as such makes a concerted effort to instill within the student body a college-going mindset. The Charter School has developed systems and structures to support students through the college exploration and application process. These strategies include:

- Graduation Requirements. Graduation requirements are aligned with the UC and CSU "A-G" subject requirements.
- College Visits. As part of the advisory curriculum, students will have the opportunity to visit colleges as often as possible, ideally once per year.
- College Counselor. Sac High has a college counselor whose sole responsibility is to support students and their families through the college admissions process.
- Advisory. Sac High has developed a comprehensive curriculum for 12th grade advisory that walks students through the college research, exploration, and application process. 12th grade advisory also assists students in preparing scholarship applications, the Free Application for Federal Student Aid ("FAFSA"), resumes, and in completing their senior portfolio. A copy of the current version of the 12th grade Advisory curriculum can be found in Appendix 1. Advisors, throughout all four years, also help students track their progress in meeting college entrance requirements including "A-G" courses and tests such as the PSAT, SAT and ACT. In addition, the advisory curriculum for grades 9-11 also addresses college and career exploration, leadership development, and community building to reinforce the Charter School's college going mission and culture.
- HBCU College Fair. All Sac High seniors currently attend the annual Historically Black Colleges and Universities ("HBCU") College Fair. As noted in the introduction, more than half of Sac High seniors earn on the spot acceptances to HBCUs at this fair each year. Many seniors also receive scholarships meant to cover varying portions of tuition.
- Classroom Culture. All teachers make personal and visible connections to the college going culture in their classroom.
- School-wide Culture. The halls are lined with college acceptance letters, pennants, the names of Sac High alumni who are attending specific colleges, and quotes of encouragement from alumni.

3. **Structured, Orderly Learning Environment.** SHPS believes all students can and will rise to the level of expectations set for them. As such, Sac High holds students to high standards for achievement and conduct. School culture is characterized by clear academic and behavior norms; an orderly, structured and disciplined learning environment; and a genuine care and concern for students. Hard work is expected. Excuses are not tolerated. Support is provided. Expectations are high for student conduct. The following elements are central to creating this culture:

- **Student-parent handbook.** Sac High has written a student-parent handbook that provides key information on school history, philosophy, and spirit, as well as behavior expectations, graduation requirements, and academic services. Students review the handbook at the beginning of each school year and sign a Commitment to Excellence Contract annually that indicates they have read the handbook and that they commit to their roles and responsibilities. A copy of the most recent student-parent handbook is available for review in Appendix 1.
- **Uniforms.** Sac High strongly believes uniforms positively impact student learning and contribute to the creation of a safe and secure campus. For these reasons Sac High has a school-wide uniform and dress code. The current dress code is outlined in the student-parent handbook, located in Appendix 1.
- **Norms and Routines.** Sac High orients students towards a common set of norms, phrases and routines that focus on academic achievement, work ethic and respect. These expectations are outlined in the Charter School's student-parent handbook and updated annually.

4. **Rigorous, Standards-Based Curriculum and Instruction.** In order to compete with the most talented and privileged students across the nation, students need to have the strongest foundation of academic knowledge and skills possible. Sac High uses a core curriculum that is increasingly aligned with the applicable state standards, including the Common Core State Standards ("CCSS") and Next Generation Science Standards ("NGSS"), History-Social Science Framework, English Language Development ("ELD") Standards, and the remaining State Content Standards (collectively the "State Standards") and requires all students to successfully complete a course of study that meets the University of California and California State University "A-G" subject requirements. Sac High, as of the submitting of this petition, is in the process of purchasing additional, published curriculum for the 2024-25 school year for ELA, math and science.

Another key component of the instructional program is critical thinking, which is assessed through benchmark assessments that align to the subject appropriate State Standards (e.g. CCSS for ELA and math, NGSS for science) and gradually include more rigorous questions as students continue through the school year and grade levels. A sample of the benchmark assessments is available in Appendix 2 & 3. This increased rigor ensures students are mastering the skills required for success in college. Sac High's academic program, in addition to content and skill mastery, emphasizes the higher order thinking skills necessary for success at a four-year university. Beyond rigorous classroom instruction, critical thinking is also developed through inquiry laboratories in science, essays graded on a college level rubric in English, primary document analysis in history, and application based problems in mathematics. The following are key aspects of Sac High's rigorous, standards-based curriculum and instruction:

- **Standards-Based.** Sac High utilizes a curriculum that is increasingly aligned to the applicable State Standards, including CCSS and NGSS, in order to ensure students master the requisite skills and knowledge, and are successful with state accountability measures.
- **Rigorous, Extensive Curriculum.** Sac High is implementing a balanced and comprehensive curriculum that increasingly will provide teachers with instructional resources, materials, assessments, skill development methods, intervention plans, re-teaching strategies, hands-on-learning and strategies to support English Learners and students with special needs.
- **Focus on ELA and Math.** ELA, and in particular, reading and writing, and math are the foundation of academic success. With the high expectations of Sac High's graduation requirements and a large percentage of current students entering ninth grade below grade level in math and ELA, Sac High has made reading, writing and math a central focus. The modified block schedule, where students are in each core class for 68 minutes every full school day for the entire year, provides approximately 20% more time in each class than a traditional schedule. Furthermore, the advisory period allows for additional support to be provided as needed.
- **Opportunities for Acceleration.** Sac High offers a range of college level courses to ensure students are academically challenged. Panther Pipeline (highlighted below) is open to all grade levels starting in the 2024-25 school year. During students' junior year, all students take the CAASPP for math and language arts and attempt to earn an exemption from remedial classes at all CSU campuses. Additionally, Sac High students are encouraged to take AP courses when offered, college courses at area community colleges if a student is looking beyond those offered at Sac High, and apply for internships to apply their learning outside of school.



- Sac High offers a dual enrollment program, the Panther Pipeline, in partnership with Sacramento City College. This is an opportunity for students to earn high school and college credit, at the same time. All college courses will be taught at Sac High with Sacramento City College staff in a hybrid learning model. This program launched as a pilot in 2023–24 with up to four courses for Seniors, and two courses for Juniors. The plan for this program is for students to have the opportunity to access dual enrollment classes at the start of their Freshman year and potentially complete their Associates Degree by the time they graduate from Sac High. All courses offered are transferable to all CSU and UC campuses. Students will receive support to ensure they are successful in their collegiate academics. This includes but isn't limited to: a co-teacher who facilitates support meetings and is a direct mentor to students, extra tutoring, weekly grade checks, education support plans and college dual enrollment counselors.
- Teaching and Learning Protocols. All teachers are expected to use specific teaching and learning protocols. The protocols include basic, suggested frameworks for lesson planning, including deconstruction of standards and the development of measurable objectives, board configuration, rubrics, common assessments, and data analysis. All teachers undergo intensive training to deconstruct standards, use measurable objectives, continuously check for understanding, and use structured student interaction in every classroom. Professional development for all teachers includes a heavy emphasis on the daily use of strategies and protocols from a variety of literature including "The Skillful Teacher", Saphier, et al., (2008); "Classroom Instruction that Works", Marzano, et al., (2001); "Pre-Referral Intervention Manual", McCarney, et al. (2006); "Driven by Data", Bambrick-Santoyo (2010); "Teaching as Leadership", Farr (2010); and "Teach Like a Champion 1 & 2", Lemov (2010).

- **Diverse Pedagogy.** Sac High recognizes students learn in different ways and no one teaching method will work for all students. Pedagogy needs to be adaptive and culturally responsive as well as provide students with a wide range of opportunities to succeed. To ensure all students are actively engaged in learning, Sac High delivers instruction through a variety of modalities (e.g., auditory, visual, kinesthetic) and uses multiple instructional strategies. Examples of these strategies include: direct instruction, teacher as coach and facilitator, cooperative learning and group work, use of classroom technology, Socratic questioning, inquiry-based instruction, project-based learning, and experiential learning.
- **Flexible Grouping.** Too often, teachers “teach to the middle,” meaning instruction is geared toward the mid-range of academic levels in the classroom. This is a disadvantage for both students who are struggling and those who are excelling. In order to maximize the learning opportunities and achievement for all students, not only will instruction be delivered through a variety of modalities as described above, but flexible grouping strategies (whole class, adjusted seating arrangements, learning centers, cooperative groups, small group, partner work, independent work, project-based learning, and one-on-one tutoring, just to name a few) will be used to ensure students are receiving support and enrichment based on their specific areas of need, as indicated by State-mandated assessments, benchmark assessments and performance on teacher-created assessments. Student groups may change throughout the day, week or year based on students’ changing needs and/or optimal instructional mode. While students are grouped to better meet their needs, standards and expectations are consistent across classrooms.

5. **Data-Driven Instruction.** Equally important to the curriculum (what is taught) and instruction (how material is taught) is what students have learned. Measuring student learning requires frequent analysis of student achievement data and ongoing revision of instructional plans in order to implement the most effective strategies to increase student learning. Sac High’s instructional methods and philosophy are not revolutionary. Much of students’ academic success can be attributed to both students and teachers showing dogged determination, a tireless work ethic, an unwavering belief and sheer will. Teachers look to meet every student where they are at and continue to teach, re-teach, scaffold and support students until they master the necessary skills and knowledge. With that said, Sac High’s model centers on the diligent use of student achievement data gathered through annual summative assessments such as CAASPP, benchmark assessments and daily Exit Tickets.

- **Benchmark Assessments.** The use of formative (diagnostic and ongoing), standards-aligned assessments allows school leaders and teachers to regularly measure the progress of students and modify instructional practices based on this data. Sac High has implemented an assessment system in which benchmark tests are given in all core subjects at least quarterly. Benchmark results are analyzed by teachers to inform curricular and instructional adjustments throughout the year. Additionally, diagnostic assessments are given to all incoming 9th graders in ELA and mathematics prior to or in the beginning of the school year in order to properly place each student in the appropriate core courses.

6. **Extended Time for Learning.** With Sac High's model, including the extended school day, students have more instructional time to master the knowledge and skills that prepare them for competitive colleges and success beyond school. Students who are behind have the opportunity to catch up and students who are on or above grade level have the opportunity to accelerate their learning at a pace suited for their ability level. Both the current instructional calendar and daily bell schedule are included as part of the student-parent handbook, located in Appendix 1. Sac High will strive to maintain, and if possible expand, the below features of the Charter School's program.

- **Extended Day.** Sac High's full instructional day is currently from 8:30 a.m. – 4:13 p.m. Academic support, enrichment, and extracurricular activities (all of which are attendance-optional) are offered before and after school.
- **Modified Block Schedules.** For the past several years Sac High has implemented a modified block schedule. Specifically, the current schedule includes six 68 minute periods four days a week plus a weekly minimum day (currently Wednesdays) with 41 minutes classes and an advisory period. The modified block period for all classes provides increased opportunities for in-depth learning, with bell-to-bell instruction as the expectation. The school year is divided into two semesters (fall and spring). The block schedule also allows students to take core courses for an entire year to provide more time to master the content and to better prepare themselves for the rigor of college.
- **Office Hours.** All teachers have office hours outside of class to provide students additional opportunities and more time for support. Office hours, which are posted, are before school, during lunch, or after school to ensure students have access to teachers.



- **Two-Way Communication.** All Sac High teachers currently have email addresses, provided by SHPS. Students and families have access to the email addresses for their teachers. As needed, students can contact their teachers for additional support and teachers are expected to respond.
- **Dragon Academy Tutoring.** Sac High currently runs an after-school program that includes opportunities for tutoring and reteaching free of charge. All Sac High students are able and eligible to attend at any time and on any day for this drop-in support service.

7. **Structured Intervention and Support.** Sac High employs a series of specific and targeted interventions to quickly accelerate the learning of all students, having a particularly positive impact on those who are the furthest behind grade level. This is done without lowering academic expectations for any student. Examples of these structures are listed below.

- **Advisory.** One responsibility of all advisors is to monitor the progress and performance of all their advisory students. If needed, advisors are tasked to provide extra support for students in need. Through the use of Academic Intervention Conferences ("AICs"), advisors bring together teachers, family members, and the student to develop a personalized support plan to get students back on track to be prepared for college. AICs could be called by an advisor if a student is struggling academically in more than one class, one of which could be advisory, as additional resources may be needed to support the student to get back on track. These conferences also happen at the grade-level based on

how students are performing across all of their classes. Additionally, through weekly, individual tracking of grades, GPAs and attendance, students, advisors, and families have an opportunity, and, almost more importantly, maintain an open, trusting relationship where students can discuss the need for additional interventions and support.

- **Math and ELA Inclusion Classes.** Students in need of additional support as identified in their IEP are cohorted into inclusion classes for math and ELA. Inclusion classes are co-taught by a general education teacher and an education specialist or teaching assistant. In addition to delivering whole group instruction, the additional instructor is able to re-teach, review and provide guidance if a student is struggling or in need of additional support. All students enrolled in these classes benefit from the lower student to teacher ratio and additional expertise that comes from having two teachers in one classroom. Given this, students who may need extra support but may not have an IEP, or may not have the specific subject listed in their IEP, can benefit from being enrolled in inclusion classes.
- **College Track.** In 2014-15 College Track Sacramento opened. College Track is a national education non-profit focused on supporting low income and first-generation students from the summer before 9th grade through the next ten years as students work towards earning a four-year college degree. Now fully grown out, almost 200 Sac High graduates are enjoying the support of College Track as they climb the mountain to and through college. Sac High students or alumni are enrolled in all ten cohorts served by the program.
- **Assessing Learning and Differentiating for High and Low Achievers:** At the beginning of the year, or semester, teachers work with students to establish a baseline for where students are starting and identify any immediate support needed for students, including any intervention support a student may need to ensure they have mastered the necessary prior knowledge to succeed in their courses. This baseline may include performance in previous classes and establishes where students are starting. Teachers use this data to identify each student's performance level and plan instruction and support for the students accordingly. This support is in the form of intervention for low achieving students, and challenges for higher performing students. In addition, throughout a course, students are regularly assessed to monitor their progress and the effectiveness of instruction. Data is utilized to adjust instructional strategies, such as student grouping or class schedule, instructional delivery, or a variety of other programmatic components.

- Academically Low-Achieving Students.
 - Sac High currently implements a multi-tiered system of support ("MTSS") to support scholars who may be struggling with the instructional program. A team is dedicated to reviewing student data and supporting the progress of students and overall procedures within the Charter School. The MTSS team is a school-based, multidisciplinary problem-solving team that offers a variety of perspectives to comprehensively support all students at Sac High. The MTSS team exists to proactively address system needs by reviewing school-wide data, assigning supports to students at tiered levels based on need, in alignment with the principle of Least Restrictive Environment, and support individual student growth by helping to monitor progress and make decisions for students at the Tier Three level. The MTSS team currently meets at minimum on a quarterly basis to support specific students, create action plans, and consult on effective measures of support within the systems and structures of the Charter School.
 - The MTSS team is composed of a variety of staff, including general education, special education, deans/campus support, student services, administration (e.g. inclusion coordinator), etc. to contribute to school wide improvement strategies, as well as support students at the individual level.
 - To help increase capacity to support all students, SHPS added an inclusion coordinator to increase student support and interventions, specifically focused on students with SST plans, 504 plans, or students receiving Tier 2 interventions, as well as to consult with teachers, families, and staff to support progress. This position was added to best support increasing student needs following the disruptions to school, and life, caused by the COVID-19 pandemic.
 - After each benchmark assessment teachers and education specialists identify the key levers for their classrooms and for students of focus. Instructional staff make an action plan for students of focus that involves an alternate calendar of objectives to catch students up where they are struggling and specific times when they will be involved in intervention activities such as small group instruction and differentiated activities within the classroom.
 - Additionally, Sac High has numerous structures in place, many of which have already been described, to support academically low achieving students. The Charter School will continue to, where necessary and as feasible, add to its programs to support students who are performing below grade level as it has done so already with the examples provided. Current and past practices for supporting low achieving students include the following (divided into categories of school-wide versus individual support):

- School-wide support structures for all students:
 - Advisory
 - Provides a small class setting and an advocate to monitor student progress (weekly at minimum),
 - Provides support through a positive relationship and establish regular communication between school and home.
 - Through advisory, students can receive support for assessments, such as CAASPP, by grade level. Advisory groups can be adjusted based on the ability level of students for specific days, allowing lower performing students to be placed in smaller groups with support from more experienced teachers.
 - If needed, advisors also facilitate Academic Intervention Conferences for students who are struggling. These conferences bring together all stakeholders (student, family, teachers, and administrators) to develop a plan to support a student and ensure they are successful.
 - Extended day and year
 - Sac High's extended day provides students with a greater amount of time in a structured environment where the focus is achievement and preparing for college. The longer day also provides sufficient time to master the content and skills needed in each class to be college ready at the end of high school.
 - Sac High's school year provides a shorter summer and thus less time for students to experience the typical loss of learning that occurs when students are out of school, compared to traditional school calendars. Also, when available, Sac High offers students a robust summer program, further shortening the time students are out of a structured environment.
 - All teachers at Sac High also have set office hours when they are available to support students outside of scheduled class time. Office hours are posted and take place before or after school, or, most often, during lunch. Students know when office hours are and to use office hours to receive help or find answers to their questions.
 - Modified block classes. A longer class period allows for additional instructional support structures to be in place in each class daily. In addition, teachers are better able to establish relationships with all students and understand how to meet the needs of all students.

- College visits and a college-going culture
 - Visits are used to increase student investment as they are able to connect their daily work in class to the goal of attending and earning a degree from a 4-year college.
 - The school-wide culture establishes a clear goal for students to work towards and reinforces that goal with visual and other reminders of success.

- Counseling/Support team
 - The combination of counselors provides an additional network of support to ensure students are:
 - Supported socially and emotionally
 - On track to graduate
 - On track to be prepared for and accepted to a 4-year college

- School-wide norms and routines, common teaching protocols
 - Consistency in areas such as classroom expectations, board configuration, dress code, and other routines from class to class and year to year create clear expectations for students and ensure students understand how to succeed at Sac High. This consistency is crucial for struggling students as it allows them to focus on meeting the academic expectations in each class and allows them to know how to succeed in the non-academic aspects of school, regardless of the class they are in.

- Diverse instructional methods
 - Within the norms and protocols discussed above, teachers have the flexibility to teach how their students learn best, which varies from class to class and student to student. Teachers are trained to deliver instruction with a variety of modalities and provide multiple opportunities for success.



- Individualized support structures based on student need
 - Flexible grouping
 - Both during and outside of class, teachers are able to group students as needed to provide the maximum level of support. For students who are struggling, this may be a small group working with a teacher or another educator during independent practice, student pairs where a high-achieving student supports a student who needs help, or teacher meetings with individual students or groups of students outside of class to review material and ensure student mastery.
 - Students are also given the opportunity to take classes over the summer if they did not pass them during the year. Currently these classes are offered online.
- Inclusion classes
 - As discussed in this Petition, students, as needed, are placed in full inclusion classrooms to provide additional support. This provides struggling students with daily access to core content along with the support of a second teacher in the room to help differentiate instruction.
- Tutoring
 - Sac High has provided tutoring to students through its Supplemental Educational Services ("SES") funding and will continue to do so as required with applicable law(s). Tutors work with students one-on-one to ensure mastery of current skills and concepts, as well as provide background knowledge if necessary.
- Mentorships
 - Sac High partners with several organizations in Oak Park and around Sacramento. In addition, Sac High is always looking to expand mentorship opportunities and has recently, for example, worked with engineering groups and Young Moguls to allow more students access to a mentoring relationship.

- Monitoring Student Progress
 - As discussed, student progress is regularly monitored with multiple forms of assessments. Teachers often use exit tickets to measure student mastery of daily objectives. Benchmark assessments, typically occurring quarterly, monitor student progress and the effectiveness of instruction and support structures. In addition, if students show sufficient improvement, support structures are adjusted or, if deemed appropriate, eliminated, provided students show continued progress. In addition, teachers use other methods, such as portfolios, essays, projects, presentations, and others to measure student learning and determine what supports are needed. Advisors monitor student GPAs and attendance weekly, as well as communicate progress with students and families.
- Academically High-Achieving Students. In addition to supporting students who are below grade level, Sac High provides a challenging, rigorous environment to students who are performing above grade level. Many of these features of the Sac High program have already been described, and are highlighted again below. High achieving students are pushed to not just master, but go above and beyond the applicable State Standards in multiple ways. High performing students are identified through diagnostics, benchmark exams and, for students who transfer in, past performance on assessments and grades on their transcripts. Furthermore, the Charter School will continue to, where necessary and as feasible, add to its programs to support high achieving students. Many of the current practices are included in the following list, which is not exhaustive:
 - As mentioned in the prior section on students achieving below grade level, after each benchmark assessment, teachers and education specialists identify the key levers for their classrooms, including next steps for students who are performing above grade level.
 - College courses
 - Students who have the flexibility in their schedule are encouraged to take courses at the community college level if they are not offered at Sac High through the recently launched Panther Pipeline dual enrollment program in partnership with Sac City college.

- Internships
 - Students often have free periods in their senior year and are encouraged to participate in internships on and off campus in areas of interest. All students can participate in summer internships. Internships provide students with a real world connection to what they learn in the classroom, as well as an opportunity to apply their learning in school to an area of interest. Sac High students have interned in diverse settings from Sacramento City Hall, art galleries to banks to the UC Davis Med Center to the halls of the State Capitol.
- Additional courses in areas of interest
 - While all Sac High students must meet the UC/CSU eligibility requirements to graduate (unless otherwise noted, such as in an IEP), students have the opportunity to take additional classes in areas of personal interest. A complete list of current A–G approved courses offered at Sac High is included in Appendix 1.
- Extracurricular activities
 - Sac High offers a wide variety of extracurricular activities from sports to clubs to fitness activities. All students are encouraged to participate, and there are academic requirements for many of these options.
- Leadership opportunities
 - Students who are interested in leadership opportunities and have the capacity to participate, are able to join Student Senate, or obtain a leadership position through any of the extracurricular activities offered by the Charter School.
- Differentiation
 - High achieving students have opportunities to complete enrichment and challenge activities aligned to the curriculum. Within classrooms they may receive differentiated materials that push their knowledge and skills beyond the grade level standards or, through more advanced books and literature, past the expected reading levels.
- AP exams
 - Part of Sac High’s profile of a graduate is that students have demonstrated college readiness. One way to do this is by passing an AP exam. In the past Sac High has offered a variety of AP courses starting as early as 10th grade. With the addition of the Panther Pipeline dual enrollment program, Sac High will reassess the AP courses offered to ensure they are complementary to the dual enrollment opportunities provided. Interested students are still able to take AP exams even if the specific course is not offered at Sac High. Sac High currently covers the cost of AP exams for interested students.

8. Leadership Development and Community Service. Sac High seeks to instill within students a strong sense of civic responsibility and a lifelong commitment to meaningful community involvement.

- Service Requirement. Sac High requires students to complete at least 110 hours of community service over their four years in high school with the hours required each year increasing from grades 9 up to 12. Students who transfer to Sac High are only required to complete community service for the time they are enrolled at Sac High.
- Leadership Opportunities. Sac High offers a variety of opportunities for students to develop their leadership skills on and off campus, including providing students with meaningful ways to participate in school leadership such as student senate, clubs, and sports, and externally through internships and tutoring.

9. High Quality Professional Development. Professional development is a cornerstone of St. HOPE Public Schools and supports the development of both teachers and staff. An overview of recent summer professional development training, both for new teachers and for returning staff, is located in Appendix 5.

- New Staff Orientation. All new teachers attend a 3-day long orientation that centers on teacher professional development and SHPS and Sac High culture. New teachers learn about Sac High norms for instruction (clearly stated and measurable objectives, continuous checking for understanding, structured student interaction), and behavior (e.g., norming on classroom routines, uniforms policy, etc.) A schedule for New Teacher Orientation week is provided in Appendix 5.
- All Staff Summer Orientation. Prior to the start of the school year all staff attend training for a week and a half. This orientation includes, but is not limited to, team building, collaboration, instructional planning, scenarios reviewing and modeling best practices and safety training.



- **Teacher Work Days and Professional Development.** All teachers attend regular teacher workdays that are a combination of whole school professional development, common instructional planning, data analysis, and collaboration. These days are a fundamental aspect of improving teacher practice and implementing highly effective, school-wide instructional pedagogy. Teachers attend sessions on effective practices based on respected authors (Lemov, Marzano, Saphier, Farr, etc.), practice with peers, and create/adjust instructional plans in order to implement highly effective curriculum and instruction. The weeks prior to the school year beginning are typically reserved for professional development for all staff. This time is typically driven by a combination of SHPS and school leaders, and what is seen as topics needing to be covered based on previous results and the needs of staff. During this week, best practices and new strategies are presented and staff create plans for implementing these practices and strategies with students. It is at this point that new strategies for working with students with special needs are presented to staff, typically by school leaders but sometimes by other experts, whether from within or outside SHPS. Strategies for working with students with disabilities are often presented by members of the SHPS Special Education team. Administrators and other experienced educators present on current best practices for providing support and differentiation for all learners, including ELs, and show how current curriculum resources can be used or differentiated to meet the need of diverse learning styles and abilities.
- **Common Planning Time.** In order to ensure there is alignment of curriculum across classrooms and grade levels, as well as opportunities to share best practices, common planning time for teachers is incorporated into the school day when possible and after school on Wednesdays during weekly professional development time. During this time, teachers may meet as a content team to ensure they are developing a highly effective teaching practice. An emphasis is placed on content teams teaching from the same lesson plan.
- **Weekly Professional Development.** Every Wednesday, students have an early release day. This additional time is used by staff for subject area and/or grade level planning, advisory planning, and whole school workshops on effective instructional practices.
- **School and Instructional Leaders.** Perhaps the most important development opportunity for a teacher is the chance to have an instructional expert observe his or her practice and receive critical and constructive feedback. To that end, the principal and instructional leaders make regular visits to classrooms to observe teacher practice and provide regular written feedback. These visits can be captured on video so teachers have a visual connection to specific feedback, and can even watch and reflect on their own practice. Sac High's instructional culture is to make individual teacher practice public, with open invitations for teachers to observe each other regularly.

The structures above allow for staff to participate in a professional development program that supports the Charter School's goals for increasing student achievement. Professional development activities have teachers engaging with highly effective instructional strategies and honing those strategies in the classroom.

Professional development includes in-house meetings and workshops, the extensive use of Infinite Campus and Illuminate, adapting technology for the classroom, content team meetings, individual support and coaching, and the participation of new teachers in the Induction program. All of these efforts work to provide teachers with opportunities to develop, share and utilize instructional strategies that engage students and focus instruction on the appropriate content standards for their particular course(s).

Professional growth is also promoted through regular administrative classroom visits that include individual teacher feedback and regular feedback on both lesson planning and instruction. All teachers receive an annual evaluation based on the SHPS Teacher Evaluation Rubric, which is a comprehensive tool focusing on five areas of teacher competency: planning, execution, assessment, classroom culture, and fit with the organization. Evaluations are conducted through classroom observations using a comprehensive rubric that helps teachers focus on highly effective skill sets. Teachers can expect regular classroom observations with written feedback and at least one annual conference to discuss specific ways teachers can move towards or stay at the highly effective level of the evaluation rubric.

Sac High's improved student performance on a variety of metrics is evidence of the effectiveness of the Charter School's professional development. Sac High will continue to expand efforts to evaluate the effectiveness of professional development programming and implement improvements as needed in order to improve overall student achievement.

Professional development and training for staff extends beyond instructional leadership and data driven practices. Staff is also trained on safety expectations. For example, staff are currently trained on the Catapult Safety App and SHPS collaborates with the Red Cross and the EDCOE SELPA for additional training. CPI training is also conducted for staff at each school site, which includes recertification every 18-months.

10. Parent and Community Involvement. Research shows parent involvement helps student achievement. Parents and families play a crucial role in the success of their children and Sac High wants parents to be active participants in their child's education. As such, the Charter School seeks to create an open, welcoming environment for parents and families. Below is a summary of key parent involvement strategies:

- Student Progress. The Charter School regularly reports academic and non-academic (i.e., behavior, attendance) progress to parents through regular grading periods, reporting of test score results (i.e., ELPAC and CAASPP), and parent conferences.
 - Accountability/Data Wednesday. Each student is part of Advisory for four years and has an advisor in a smaller classroom setting. Every Wednesday, currently, as part of Advisory, grades and attendance are sent home for a parent signature.
 - Conferences. Teachers facilitate semester, or, if needed, more frequent, student led parent-teacher conferences.

- Web-Based Student Information System. Sac High currently utilizes Infinite Campus, which is a web-based student information system. This system allows parents access 24 hours a day to real-time information about their child's attendance and grades. All parents can be provided with training on how to use the system. Additionally, a number of computers are available at the Charter School to allow parents and students without computers access to the system.
- Family Engagement Events. At least once per quarter (four times per year) the Charter School holds a program for parents to update them on the Charter School's programs, as well as to provide an opportunity for parents to meet their students' teachers and other staff.
- Commitment to Excellence Contract. Sac High parents are expected to sign their child's Commitment to Excellence Contract (along with the student, advisor and principal). The contract, complemented by the student-parent handbook, clearly outlines the Charter School's goals, expectations, policies and procedures.
- Parent Involvement/Volunteers. Parents may volunteer in a variety of ways such as: attending parent-teacher conferences, serving on the School Site Council, attending parent meetings, chaperoning student activities, and completing parent satisfaction surveys. Sac High is flexible as to how and when parents are involved, providing ample opportunities and means for parents to support their child and the Charter School. SHPS created a Parent/Guardian/Family Involvement Policy that establishes the expectations for parent involvement. This policy can be found in Appendix 4.
- School Site Council and Other Advisory Councils. Sac High has a School Site Council ("SSC") that encompasses the English Learner Advisory Committee (as needed based on the number of English Learners enrolled). More information on SSC can be found in Element 4 of this Petition.
- Two-Way Communication System. The Charter School disseminates schoolwide information through multiple means (i.e., onsite postings, mail, email, phone calls, notices sent home through students, website, parent surveys), many of which allow for a two-way, home-school communication system. Parents can receive regular calls from advisory teachers with updates on attendance, grades and student accomplishments and have a listing of teacher cell phone numbers and email addresses to facilitate responsive communication. SHPS email addresses are provided to all Sac High staff to maintain consistency of communication expectations between all families and staff. The Charter School provides documents translated into other languages, as necessary and feasible, to allow greater parent communication with non-English speaking parents. To allow more parents to participate, Sac High offers, when feasible, multiple times and days for a variety of meetings (i.e., parent conferences) and home visits to accommodate families. Sac High complies with all requirements for parental notification regarding the rights for parents to request records and teacher and/or paraprofessional requirements. In addition, SHPS has established a written complaint procedure that is available to all parents and provides parents with the opportunity to make suggestions, as well as voice dissenting views, of any program through formal and informal means.

- Community Partnerships. Sac High also relies heavily on community partnerships to support teaching and learning and the overall mission of the Charter School. Local business and community organizations will continue to be called upon to provide resources to the Charter School, including funding, the donation of materials, volunteering, and tutoring students. Hands-on experience is central to the mission of Sac High. Businesses and community organizations will also be asked to provide students with opportunities to apply classroom learning to real world projects, problems, internships, and jobs. The Charter School currently works with community partners such as UC Davis Medical Center to offer internship and mentoring opportunities to students. In addition, the Sac High hosts an extensive Black History Month program annually. This includes exposing students to a speaker series, art gallery visits and culinary demonstrations.

Overall, as described in the key elements above, Sac High has created a rigorous college prep educational program for all students combined with a system of support to assist all students in succeeding. This program has produced strong results and will continue to be refined, through the lens of continuous improvement, as the Charter School strives to achieve its mission and vision for all students.

In addition to the programmatic elements already described, there are other key aspects of Sac High's educational program. To start, technology resources, exposure and experience are also key to ensuring students leave high school prepared for the next step. Sac High currently has the following technology options available to students:

- Chromebook laptop carts are available for teachers to check out and use in their classrooms to enhance instruction and learning. Sac High at a one to one ratio of devices to students and will continue to invest in Chromebooks and Chrome carts until as needed to maintain this one to one ratio as resources allow.
- Graphing calculators were purchased for higher level math classes and engineering to support student learning.
- Projectors, interactive whiteboards and document cameras are located in every classroom.

Combined these items enhance the learning experience for students by allowing teachers to use a wider variety of instructional strategies in their lesson delivery.

SPECIAL POPULATIONS

Sac High is committed to creating an inclusive learning environment that supports the needs of all students to thrive academically and socially, including students with disabilities and English Learners. The primary mechanism for supporting special populations is through full inclusion in specific, supported classrooms. This provides students with daily access to core content along with the support of a second educator in the room to help differentiate instruction and decrease the student to adult ratio. All educators within supported classrooms participate in the planning and development of lesson plans, and attend department collaboration meetings.

STUDENTS WITH DISABILITIES

Overview

The Charter School recognizes students will come to Sac High with varying needs, including for disability-related accommodations. The Charter School has been purposeful in creating an environment that values and supports every child who enrolls, regardless of disability. Staff at Sac High is committed to supporting all students and providing them with a high-quality, college-preparatory education.

The Charter School uses many strategies to support all learners in the general education setting and, in particular, special education students. Within its inclusion model the Charter School uses co-teaching methodologies that allow all students to benefit from having a general education and a special education teacher in their core classes. This allows staff to reteach those students who need additional support or instruction while maintaining rigorous lesson pacing. The Charter School uses flexible grouping strategies in classrooms and offers one-on-one assistance to those who need it. In addition, Sac High uses adaptive computer programs which help students with significant academic needs fill in their skill gaps and catch up with their peers.

The Charter School also offers extra time for students to complete assignments and tests and allow multiple opportunities to retake tests and redo assignments for students whose IEPs indicate these supports. Sac High currently offers tutoring each morning on every school day where students can receive one-on-one support, or support in small groups to get extra help in mastering concepts, make up missing assignments, and retake tests and class exit tickets. Any support provided by the after school provider or beyond the school day others will be above and beyond the requirements of a student's IEP. In addition, any services outlined in the IEP will only be provided by certificated and qualified special education staff, as required by law.

Sac High's staff provides all enrolled students with disabilities, regardless of their district of residence, with a Free Appropriate Public Education ("FAPE") within the Least Restrictive Environment ("LRE"). The Charter School complies with all applicable state and federal laws in serving students with disabilities, including, but not limited to, IDEA, Section 504, ADA, and any other requirements imposed by the U.S. Department of Education Office for Civil Rights ("OCR").

Sac High is an independent local educational agency ("LEA") (for the purposes of special education) and the Charter School is a member of the El Dorado Charter Special Education Local Plan Area ("EDCOE Charter SELPA" or the "SELPA") in conformity with Education Code Section 47641(a). In the event the Charter School seeks membership in a different state-approved SELPA, the Charter School shall provide notice to the District, the SELPA, and the California Department of Education before June 30th of the year before services are to commence.

Sac High complies with all state and federal laws related to the provision of special education instruction and related services and all SELPA policies and procedures; and shall utilize appropriate SELPA forms. As a result of SHPS' participation in the EDCOE Charter SELPA, the Sacramento City Unified School District is not obligated to provide or oversee special education and related services at Sac High. Appendix 1 includes a detailed guide to the EDCOE SELPA policies, procedures, and legal compliances.

Sac High may request related services (e.g., Speech, Occupational Therapy, Adapted P.E., Nursing, and Transportation) from the SELPA, subject to SELPA approval and availability. Sac High may also provide related services by hiring credentialed or licensed providers through private agencies or independent contractors.

Sac High shall follow SELPA policies as they apply to all SELPA schools for responding to implementation of special education services. Sac High has adopted and implemented policies relating to all special education issues and referrals.

Sac High shall be solely responsible for its compliance with Section 504 and the ADA. The facilities to be utilized by Sac High shall be accessible for all students with disabilities.

SPECIAL EDUCATION PROGRAM STRUCTURE

Sac High's special education program is spearheaded by the Director of Special Education for SHPS who is directly responsible for ensuring Sac High is in compliance with all applicable special education laws and requirements. Special education teachers are employed to ensure the unique needs and learning styles of all students are being met. At Sac High students are educated in the LRE and within the general education classroom whenever possible, as well as provided with push-in services and uniquely designed accommodations or personalized strategies to aid learning. In exceptional circumstances, when it is critical to a student's academic progress, the Charter School utilizes pull-out services to aid the student's academic success. Education Specialists coordinate the direct instruction and inclusion of Special Education ("SPED") students. Classroom teachers are informed of their responsibilities for particular students, trained and guided by the Director of Special Education, Special Education teachers and/or the Principal on how to successfully meet those responsibilities, and implement any modifications or accommodations in their classes in accordance with the students' Individualized Education Plan ("IEP"). As required, tutoring, counseling, physical, occupational, speech and language therapy services are provided outside of the classroom (either by Sac High certified staff or specially contracted expert professionals) for those with special needs.

Sac High students who have IEPs also receive extensive support beyond the inclusion "push-in" model on an as needed basis. While not an exhaustive list of the services that can be provided based on student need, Sac High has students whose systems of support include, or may include, some or each of the following:

1. Behavior Intervention Services through a consultative model in collaboration with the School Psychologist, Education Specialist, and General Education Teachers. This could include 1:1 Behavior Intervention Support where a student has an adult assigned individually to provide both behavioral and social/emotional support full time on campus.
2. Very small group or individualized one-on-one instruction in pull-out or push-in groups to increase access and improve student response opportunities and pacing.
3. Speech sessions per their IEPs including both individual and small group pull out sessions.
4. Counseling services as specified in their IEPs to support their social/emotional growth.
5. Occupational Therapy, Adaptive PE, Deaf & Hard of Hearing support are provided when necessary by non-public agencies ("NPAs"). Or independent contractors
6. Students whose level of need exceeds what can be provided in Sac High's on-site support programs may be provided a more intensive therapeutic environment through a Non-Public School ("NPS").

IDENTIFICATION AND REFERRAL

Sac High has the sole responsibility to identify, refer, and work cooperatively in locating Charter School students who have or may have exceptional needs that qualify them to receive special education services. Sac High implements SELPA policies and procedures to ensure timely identification and referral of students who have, or may have, such exceptional needs. A pupil shall be referred for special education only after the resources of the general education program have been considered, and where appropriate, utilized. Parents may also request their student be assessed for special education eligibility at any time.

Sac High follows SELPA child-find procedures to identify all students who may require assessment to consider special education eligibility and special education and related services in the case that general education interventions do not provide a free appropriate public education to the student in question.

When students are admitted to the Charter School, Sac High staff will follow up with the previous schools to determine whether the students have IEPs and ensure these records are transferred to Sac High. Applicants are also asked to provide Sac High with their IEP as part of the enrollment process, but this is not required.

After enrollment, parents and teachers of students with special needs attend a meeting led by special education staff to determine appropriate services to be delivered at Sac High. The Charter School complies with all laws and provisions regarding students with IEPs. Sac High implements IEPs as written, and holds a 30-day meeting in order to determine any updates and changes to the child's IEP.

Throughout the school year, Sac High's frequent internal assessment program provides an efficient means to identify students who are struggling academically. Weekly, each advisor reviews the progress of his/her students based upon their performance on homework, class work, tests, quizzes, and projects. The principal and teachers monitor student assessment data at regular intervals. This allows students who are struggling with the course material to be identified quickly.

If a student is not making sufficient academic progress, a team of both special education staff (e.g., Education Specialist, School Psychologist, etc.), general education staff (i.e. general education teacher, advisor), administrators (e.g. Inclusion Coordinator) and a parent work collaboratively to develop pre-referral strategies that may include tutoring and/or other support. This is referred to as the Student Study Team ("SST") process. The effectiveness of the pre-referral strategy on the student's progress is carefully monitored for up to six (6) weeks. In addition, other information is gathered to determine if a student may need special education support, such as parent questionnaires and interviews, classroom observations, analysis of work samples, and teachers' anecdotal data. In addition, a parent may make a referral for a special education assessment at any time. If the parent does so, the assessment may take place without waiting for prior interventions.

EVALUATING STUDENTS WITH SPECIAL NEEDS

If pre-referral strategies are unsuccessful, the student is not progressing academically, and classroom teachers, parents, guardians, or special education faculty believe a disability may exist, the student is referred, by the Charter School team in writing, for individual evaluation and determination of eligibility for special education programs and services. Referrals can be made by a parent or any professional faculty member of Sac High.

Such referrals (1) state the reasons for the referral and include any test results, records, or reports upon which the referral is based; (2) describe any attempts to remediate the student's performance prior to the referral, including any supplementary aids or support services provided for this purpose; and (3) describe the extent of parental contact or involvement prior to the referral. A copy of such referral and the procedural safeguards notice described in 34 CFR §300.504 is given to the student's parents.

The Sac High team (which may consist of the school psychologist, the principal or administrative designee, general education staff and special education staff) convene a meeting, if appropriate, with the student's parents to discuss the option of a comprehensive special education evaluation to determine the child's special education eligibility and to secure written parental consent to conduct such testing. This collaborative conversation may also take place via parent phone call with one or more special education team members.

Sac High then conducts such testing, either in-house or via the services of an expert consultant. Once the tests have been conducted and the results are received, an eligibility meeting is reconvened with the parents, the appropriate special education staff, and other appropriate faculty.

At that time, a decision is made as to the student's eligibility for special education services. If the team determines the student is eligible for special education services, an IEP for that student is developed.

IEP DEVELOPMENT

Sac High understands the decisions regarding eligibility, goals/objectives, program, services, placement, and exit from special education shall be the decision of the IEP team, pursuant to the IEP process. Programs, services, and placements shall be provided to all eligible Sac High students in accordance with the policies, procedures, and requirements of the SELPA and State and Federal law.

All IEPs are evaluated and revised as needed at least annually. All assessments and evaluations are repeated at least once every three years. For further details on the "Referral, Assessment, and Placement" process, timelines, and legal compliance for special education services please see the EDCOE Charter SELPA Procedural Guide as well as the EDCOE CAC Parent Handbook. All of these documents are located in Appendix 1.

ASSESSMENTS

The term "assessments" shall have the same meaning as the term "evaluation" in the IDEA, as provided in Section 1414, Title 20 of the United States Code. Sac High will determine what assessments, if any, are necessary and arrange for such assessments for referred or eligible students in accordance with applicable law. Sac High shall obtain parent/guardian consent to assess Charter School students.

INTERIM AND INITIAL PLACEMENTS OF NEW CHARTER SCHOOL STUDENTS

Sac High shall comply with Education Code Section 56325 with regard to students transferring into the Charter School within the academic school year. In accordance with Education Code Section 56325(a)(1), for students who enroll in Sac High from another school district within the State, but outside of the SELPA with a current IEP within the same academic year, Sac High shall provide the pupil with a free appropriate public education, including services comparable to those described in the previously approved IEP, in consultation with the parent, for a period not to exceed thirty (30) days, by which time the Charter School shall adopt the previously approved IEP or shall develop, adopt, and implement a new IEP that is consistent with federal and state law.

In accordance with Education Code Section 56325(a)(2), in the case of an individual with exceptional needs who has an IEP and transfers into Sac High from a program under the same special education local plan area of the Charter School within the same academic year, Sac High shall continue, without delay, to provide services comparable to those described in the existing approved IEP, unless the parent and Sac High agree to develop, adopt, and implement a new IEP that is consistent with federal and state law.

For students transferring to Sac High with an IEP from outside of California during the same academic year, Sac High shall provide the pupil with a free appropriate public education, including services comparable to those described in the previously approved IEP in consultation with the parents, until the Charter School conducts an assessment pursuant to paragraph (1) of subsection (a) of Section 1414 of Title 20 of the United States Code, if determined to be necessary by the Charter School, and develops a new IEP, if appropriate that is consistent with federal and state law.

Similar to students transferring to Sac High, the Charter School will notify the district of residence for a student with an IEP if they leave the Charter School. These processes will occur via mailed notices, electronic mail, and/or phone calls.

NON-PUBLIC PLACEMENTS/NON-PUBLIC AGENCIES

Sac High shall be solely responsible for selecting, contracting with, and overseeing all nonpublic schools and non-public agencies used to serve special education students.

IEP IMPLEMENTATION

Sac High is responsible for all school site implementation of IEPs. As part of this responsibility, Sac High provides parents with timely reports on the student's progress as provided in the student's IEP, at least as frequently as report cards are provided for the Charter School's non-special education students. Sac High shall also provide all home-school coordination and information exchange. Sac High shall also be responsible for providing all curriculum, classroom materials, classroom modifications, and assistive technology.

IEP MEETINGS

Sac High shall arrange and work collaboratively with parent(s)/guardian(s) to schedule necessary IEP meetings at the most convenient times for parent(s)/guardian(s) to attend. IEP team membership shall be in compliance with state and federal law. Sac High is responsible for having the following individuals in attendance at the IEP meetings: the principal and/or the Charter School's designated representative with appropriate administrative authority as required by the IDEA; the student's special education teacher; the student's general education teacher if the student is or may be in a general education classroom; the student, if appropriate; a parent or guardian of the student; and other Charter School representatives who are knowledgeable about the general education program at Sac High and/or about the student. Sac High shall arrange for the attendance or participation of all other necessary staff that may include, but are not limited to a speech therapist, psychologist, resource specialist, and behavior specialist; and shall document the IEP meeting and provide the notice of parental rights. If a member of the IEP team is unavailable to attend, written input will be provided, or the related area of curriculum or service will not be discussed in the meeting, and a team member excusal form will be provided to the parent to approve.

SERVICES FOR STUDENTS UNDER THE "IDEA"

The following description regarding how special education and related services are provided and funded is included below for the sole purpose of providing a reasonably comprehensive description of the special education program in the Charter Petition. The Memorandum of Understanding ("MOU") between the Charter School and the SELPA provides additional details that supplement the below description. A copy of the MOU can be reviewed in Appendix 1.

Sac High shall provide special education instruction and related services in accordance with the IDEA, Education Code requirements, and applicable policies and practices of the SELPA.

Sac High provides services for special education students enrolled in the Charter School. Sac High follows SELPA policies and procedures, and utilizes SELPA forms in seeking out and identifying and serving students who may qualify for special education programs and services, and for responding to record requests and parent complaints, and maintaining the confidentiality of pupil records.

Sac High agrees to promptly respond to SELPA inquiries, to comply with reasonable SELPA directives, and to allow the SELPA access to Charter School students, staff, facilities, equipment, and records as required or imposed by law.

SAC HIGH'S INCLUSION MODEL

Sac High currently implements an inclusion model where special education students are supported in the general education classroom. As noted above, students will receive services outside of the general education classroom if required, but this is minimized where possible.

Under Sac High's inclusion model, which is directed by the SHPS Inclusion Coordinator, education specialists coordinate the direct instruction and inclusion of special education students. Classroom teachers are informed of their responsibilities for particular students, are provided training and guidance by the Special Education Director, teachers and/or the principal on how to successfully meet those responsibilities, and are responsible for implementing any modifications or accommodations in their classes in accordance with the students' IEPs. Co-teaching is a key element of the inclusion model and Sac High's general education teachers and education specialists receive professional development on best practices for co-teaching.

Sac High prioritizes serving special education students in a high quality setting and has determined an inclusion model is the most effective method for delivering instruction and ensuring achievement. Sac High's LCAP includes a metric tracking the achievement of IEP goals by special education students and the success rate has been improving.

Education specialists go above and beyond to track progress for scholars on their caseload weekly, and collaborate with stakeholders, teachers, and families to promote student progress/address any performance concerns. Additionally, in collaboration with Education Specialists, teachers and staff, the School Psychologist monitors behavioral data for students in need of behavior support plans in addition to consulting with teachers, stakeholders, and families to increase positive behaviors in the school setting.

Sample accommodation strategies for teaching special education for use as needed:

- Provide access to a multiplication table and or calculator when completing math assignments when needed
- Allow extended time for assignments and assessments, for up to a specified number of days or allocated amount of time
- Allow preferential/assigned seating – i.e., individual seat near teacher, next to a positive peer, or an area in the classroom most free from distractions
- Frequent checks for understanding during class
- Have student paraphrase directions/content back to teacher, to allow for additional processing and feedback
- Provide graphic organizer, outlines, and/or sentence starters for writing assignments
- Allow access to an assignment checklist to support in office hours/ assignment retakes or make-ups
- Chunking of instructions and/or directions – step by step directions
- Allow access to a keyboard for longer writing assignments
- Provide students with frequent positive praise for large and small accomplishments
- Use concrete examples and experiences when sharing academic information with student
- Access to text to speech or read aloud for assessments with reading passages, access to dictation while typing
- Provide near model of notes to student
- Provide study guides, allow time to review study guides (whether teacher provided or student created) prior to commencing an assessment
- Check for understanding by asking students to repeat expectations, directions, or key concepts of the lesson
- Create personal incentives to use with students, as established between staff and students, to increase student on-task behavior and work production
- Provide visual aides to supplement instruction
- Keep oral directions short and simple and make sure directions are understood by having student paraphrase directions back to staff member
- Chunk new information into smaller parts for mental storage (Ex: introduce one or two concepts at a time and pause strategically when talking)
- Allow short breaks when requested (not to exceed 2-5 minutes)
- Utilize chunking strategies for testing and independent practice (i.e. complete a predetermined amount of problems/questions, earn a reinforcement or break)
- Positive praise/reinforcement for demonstrating on-task behavior and work completion
- Get student's full attention before giving instruction
- Use clear if/then statements when providing behavioral redirections
- Use least invasive (non-verbal to verbal) strategies when redirecting behavior
- Weekly grade check-in during office hours and/or advisory class times
- Frequent school/home communication to support student if grades fall below 70% in classes
- Access to checklist for editing written assignments (grammar and punctuation)
- Prompt student to utilize spell check software for computer-based writing assignments
- Provide student with an Office Hours schedule to support in work completion
- Keep oral directions short and simple
- Verbally restate directions if/when direction is not executed
- Access to incentives when accomplishing tasks that are challenging or overwhelming

- Provide positive affirmations/reinforcement to help build confidence and assignment completion momentum
- Give reminders or facilitate check/ins with staff to check progress on work completion and grades
- Provide nonverbal cues and reminders to redirect behavior
- Provide instructions for tasks written down (i.e., on board or in notes), prompting to focus on key information during note-taking activities
- Provide positive praise/encouragement; staff check-ins to action plan next steps when help or assistance is needed (i.e., grade improvement strategies as needed or to support content understanding)
- Chunk longer problems into steps
- Facilitate reteaching of key concepts during office hours
- Provide explicit teaching and reteaching of study skills – Reminders to self-monitor pace during testing
- Prompt student to refer back to steps to solve for math problems, provide visuals of steps
- Rephrase or explain concepts in another way if student expresses confusion for a specific skill
- Allow extra processing or “think time” before student is expected to produce an answer
- Support students with organizational skills and task completion in curriculum support (i.e. prompt to write down important due dates, provide reminders for due dates/missing assignments, invite to office hours, etc.)

STAFFING

All special education services at Sac High will be delivered by individuals or agencies qualified to provide special education services as required by the California Education Code and the IDEA. Charter School staff participate in SELPA in-service training relating to special education.

Sac High is responsible for the hiring, training, and employment of site staff necessary to provide special education services to its students, including, without limitation, education specialists and teaching assistants. Sac High shall ensure all special education staff hired or contracted by the Charter School are qualified pursuant to SELPA policies, as well as meet all legal requirements. Sac High shall be responsible for the hiring, training, and employment of itinerant staff necessary to provide special education services to Charter School students, including, without limitation, speech therapists, occupational therapists, behavioral therapists, and psychologists.

For the past several years the percentage of students with IEPs attending Sac High has ranged between approximately 10% and 18%. Going forward, Sac High projects that the Charter School’s special education population will continue to reflect the population found in the District. In order to properly meet the needs of all students with IEPs, Sac High’s current Special Education staffing plan has called for the following positions in recent years:

- Education Specialists
- School Psychologist
- Teaching Assistants
- Speech Language Pathologist
- Occupational Therapist

In addition, to ensure students are receiving the appropriate services, caseloads are projected to be no more than twenty-eight students per education specialist or other properly credentialed staff member managing a caseload.

Beyond school site staff, SHPS employs members of the special education team. These staff members include a director of special education, an inclusion coordinator and a systems specialist who handles all data and maintains oversight of all IEPs for compliance.

NON-DISCRIMINATION

All children will have access to Sac High and no student shall be denied admission nor counseled out of Sac High due to the nature, extent, or severity of his/her disability or due to the student’s request for, or actual need for, special education services.

PARENT/GUARDIAN CONCERNS AND COMPLAINTS

Sac High implements policies for responding to parental concerns or complaints related to special education services. Sac High shall receive any concerns raised by parents/guardians regarding related services and rights.

Sac High’s designated representative shall investigate as necessary, respond to, and address the parent/guardian concern or complaint.

DUE PROCESS HEARINGS

Sac High may initiate a due process hearing or request for mediation with respect to a student enrolled in Sac High if it determines such action is legally necessary or advisable. In the event that the parents/guardians file for a due process hearing, or request mediation, Sac High shall defend the case.

SELPA REPRESENTATION

Sac High represents itself at all SELPA meetings.

FUNDING

Sac High is subject to the allocation plan of the SELPA.

SECTION 504

The Charter School recognizes its legal responsibility to ensure no qualified person with a disability shall, on the basis of disability, be excluded from participation, be denied the benefits of, or otherwise be subjected to discrimination under any program of the Charter School. A student, who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment, is eligible for protections under Section 504.

A 504 team will be assembled by the principal or designee, which is currently the inclusion coordinator, and shall include the parent/guardian, the student (where appropriate) and other qualified persons knowledgeable about the student, the meaning of the evaluation data, and accommodations. The 504 team will review the student's existing records; including academic, social, and behavioral records, and is responsible for making a determination as to whether an evaluation for 504 services is appropriate. If the student has already been evaluated under the IDEA but found ineligible for special education instruction or related services under the IDEA, those evaluations may be used to help determine eligibility under Section 504. The student evaluation shall be carried out by the 504 team, which will evaluate the nature of the student's disability and the impact upon the student's education. This evaluation will include consideration of any behaviors that interfere with regular participation in the educational program and/or activities. The 504 team may also consider the following information in its evaluation:

- Tests and other evaluation materials that have been validated for the specific purpose for which they are used and are administered by trained personnel.
- Tests and other evaluation materials including those tailored to assess specific areas of educational need, and not merely those which are designed to provide a single general intelligence quotient.
- Tests are selected and administered to ensure that when a test is administered to a student with impaired sensory, manual, or speaking skills, the test results accurately reflect the student's aptitude or achievement level, or whatever factor the test purports to measure, rather than reflecting the student's impaired sensory, manual or speaking skills.

The final determination of whether the student will or will not be identified as a person with a disability is made by the 504 team in writing and notice is given in writing to the parent or guardian of the student in their primary language along with the procedural safeguards available to them. If, during the evaluation, the 504 team obtains information indicating possible eligibility of the student for special education per the IDEA, a referral for assessment under the IDEA will be made by the 504 team.

If the student is found by the 504 team to have a disability under Section 504, the 504 team shall be responsible for determining what, if any, accommodations or services are needed to ensure the student receives FAPE. In developing the 504 Plan, the 504 team shall consider all relevant information utilized during the evaluation of the student, drawing upon a variety of sources, including, but not limited to, assessments conducted by the Charter School's professional staff.

The 504 Plan shall describe the Section 504 disability and any program accommodations, modifications or services that may be necessary.

All 504 team participants, parents, guardians, teachers, and any other participants in the student's education, including substitutes and tutors, must, to the fullest extent possible, have a copy of each student's 504 Plan. The Charter School will ensure teachers include 504 Plans with lesson plans for short-term substitutes and the 504 Plan is reviewed with a long-term substitute. A copy of the 504 Plan shall be maintained in the student's file. Each student's 504 Plan will be reviewed at least once per year to determine the appropriateness of the 504 Plan, needed modifications to the plan, and continued eligibility.

PROFESSIONAL DEVELOPMENT FOR SERVING STUDENTS WITH SPECIAL NEEDS

Professional training and development for faculty involved in the education of students with disabilities is ongoing and is provided by Sac High and SHPS staff, the SELPA and others as needed.

In addition, as part of Sac High's summer orientation for teachers, training includes specific focus on inclusion, co-teaching, and strategies for teaching special education students (provided by SHPS special education staff). Ongoing, weekly faculty development targets teachers who provide accommodations and modifications in support of students' IEP goals. The Charter School has ongoing professional development for staff every Wednesday. These sessions are led by the Charter School's leadership along with school based special education staff and the content is determined by analysis of student progress, observed classroom needs and via teacher request.

In addition, training pertaining to necessary skills and legal responsibilities of supporting students with a Section 504 Plan is currently provided annually to all staff at the beginning of the school year.

Serving Limited English Proficient Students

The Charter School serves any and all students with limited English proficiency, including English Learners ("ELs"), long-term English Learners, and English Learners at risk of becoming long-term English Learners, using Structured English Immersion ("SEI") so they receive appropriate support and achieve proficiency in the academic English language as quickly as possible. Sac High will continue to support ELs in moving toward reaching and surpassing high standards – the same as expected for all students, and Sac High will equip ELs with the individualized support necessary for academic success.

Sac High staff understand students will enroll at a variety of English language development levels as their educational path and exposure to the English language will have greatly differed. The staff understands a one-size-fits-all approach is not appropriate and will be intentional about creating an English language development program that addresses the needs of all students. Staff uses SEI where students' language development is intentionally embedded throughout content classes. Sac High's EL program is designed exclusively to meet the Charter School's mission. If students are to leave Sac High and enter, excel in, and graduate from college, they must read, write, and speak English fluently.

The primary objective for all services delivered to ELs at Sac High is to provide a structured support system to help students gain English proficiency. The Charter School wants all students to gain full access to the curriculum as soon as possible and it adopts the best and most proven strategies to help them do so. The curriculum and support provided to these students is selected primarily on the basis of quickest acquisition of English.

Students with limited proficiency in English achieve proficiency in the English language through the use of Sac High's services and teaching methods. Sac High ensures ELs are not excluded from curricular and extracurricular activities based on an inability to speak and understand the language of instruction, and ELs are not assigned to special education because of their lack of English proficiency. Parents whose English proficiency is limited receive notices and information in their native language, if needed. Parental outreach may also be conducted through a home visit by a Charter School representative and, if needed, an interpreter.

IDENTIFYING AND SERVING ENGLISH LEARNERS

The Charter School serves English Learners based on the U.S. Department of Education's six steps of progression through an EL program: 1) enrollment in school, 2) identification of potential ELs, 3) assessment determining need for EL services, 4) provision of appropriate EL services, 5) transition from EL services, and 6) monitoring ability to participate meaningfully. In implementing the EL program, Sac High complies with all applicable laws including Title VI of the federal Civil Rights Act of 1964 (as amended) and the federal Equal Educational Opportunities Act of 1974.

The instructional staff of Sac High adheres to the following plan with ELs:

- Upon initial enrollment into a California public school, all students receive a home language survey of languages spoken in the home.
- Students whose dominant language is not English receive an assessment of English proficiency.
- Sac High staff reports the number of EL students attending the Charter School.
- Educational programs are responsive to ELs' specific needs and in compliance with state and federal guidelines.
- Sac High staff adjust this plan as needed, in the best interest of each student's achievement.

ENGLISH LANGUAGE PROFICIENCY ASSESSMENT

All students who indicate their home language is other than English will be tested with the English Language Proficiency Assessments for California ("ELPAC"). The ELPAC has four proficiency levels (Level 4: well developed; Level 3: moderately developed; Level 2: somewhat developed; and Level 1: minimally developed) and is aligned with the 2012 California ELD Standards. The ELPAC consists of two separate assessments:

- Initial Assessment ("IA")

The ELPAC IA is used to identify students as either an English Learner, or as fluent in English. The IA is administered only once during a student's time in the California public school system based upon the results of the home language survey. The locally scored IA will be the official score. The IA is given to students in grades 9–12 whose primary language is not English to determine their English proficiency status.

- Summative Assessment ("SA")

ELs will take the ELPAC SA every year until they are reclassified as fluent English proficient. The SA is only given to students who have previously been identified as an EL based upon the IA results, in order to measure how well they are progressing with English development in each of four domains. The results are used as one of four criteria to determine if the student is ready to be reclassified as fluent English proficient, to help inform proper educational placement, and to report progress for accountability.

Both the ELPAC SA and IA are assessments administered in grade spans K, 1, 2, 3–5, 6–8, 9–10 and 11–12. In grades 9–12 (the grade levels served by Sac High), the test is administered in groups, exclusive of speaking, which is administered individually. The ELPAC IA and SA will be administered via a computer-based platform. Testing times will vary depending upon the grade level, domain, and individual student. Both the ELPAC IA and SA are given in two separate testing windows through the school year.

The IA testing window will be year-round (July 1–June 30). Any student whose primary language is other than English as determined by the home language survey and who has not previously been identified as an English Learner by a California public school or for whom there is no record of results from an administration of an English language proficiency test, shall be assessed for English language proficiency within 30 calendar days after the date of first enrollment in a California public school, or within 60 calendar days before the date of first enrollment, but not before July 1 of that school year.

The SA testing window will be a four-month window after January 1 (February 1–May 31). The English language proficiency of all currently enrolled English Learners shall be assessed by administering the test during the annual assessment window.

The Charter School will notify all parents of its responsibility for ELPAC testing and of ELPAC results within thirty days of receiving results from the publisher. The ELPAC shall be used to fulfill the requirements under ESSA for annual English proficiency testing.

The primary objective for all services delivered to EL students at Sac High is to provide a structured support system to help students gain English proficiency. The Charter School wants all students to gain full access to the curriculum as soon as possible and so it has adopted the best and most proven strategies to help them do so. The curriculum and support provided to these students is selected primarily on the basis of quickest acquisition of English.

Students with limited proficiency in English achieve proficiency in the English language through the use of Sac High's services and teaching methods. Sac High ensures ELs are not excluded from curricular and extracurricular activities based on an inability to speak and understand the language of instruction, and ELs are not assigned to special education because of their lack of English proficiency. Parents whose English proficiency is limited receive notices and information from Sac High in their native language, if needed. Parental outreach may also be conducted through a home visit by a Charter School representative and, if needed, an interpreter.

ENGLISH IMMERSION PROGRAM AND SERVICES

All ELs are enrolled in the same academic courses and content as those students who are native English speakers. Sac High staff use SEI, allowing ELs to access the curriculum at their language level. All instruction at Sac High is in English, however, the level of English used for instruction — both oral and written — is modified appropriately for ELs with the intended purpose of holding every student to high academic standards. SEI provides a more structured approach to learning English and blends English grammar and vocabulary instruction with the teaching of content.

Federal law expects school programs for ELs to be based on sound educational theory, to provide ELs the opportunity to participate with the other students in the educational offerings, and to show evidence of producing academic success. As a result, Sac High's SEI program is designed to:

- Mainstream all ELs;
- Accelerate achievement through the program's focus on teaching English to learners from the beginning;
- Ensure that academic progress is continuous; and
- Continually assess ELs academic progress.

SEI does not mean that the content is "watered down." Instead, teachers incorporate a variety of strategies to make the content more comprehensible with a focus on building academic language through content. For example, teachers use visuals and diagrams, provide many opportunities to practice key vocabulary, and utilize graphic organizers. General education teachers of English learners adapt lessons, assignments, and instructional groups to reduce language barriers and to assist ELs to participate fully in the educational program. Staff will participate in professional development opportunities in these areas as they become available. Students are never prevented from speaking in their native language, either inside or outside of the classroom. The Charter School creates the most accepting cultural atmosphere possible, such that students of all backgrounds and languages feel welcome and valued.

STRUCTURED ENGLISH IMMERSION INSTRUCTIONAL PRACTICES

Sac High teachers intentionally and explicitly teach academic language in content classrooms. In order for English learners to be successful in the classroom, they must master both informal and academic English. Academic English is the content-specific language used within specific disciplines. Sac High teachers are intentional about planning vocabulary development in their lessons. Vocabulary-building exercises are incorporated into all classes so that students learn academic vocabulary in the content-specific context, making it meaningful and relevant.

Integrated ELD instruction occurs throughout the normal instructional program and is a focus in ELA classes. The best practices for ELD are also best practices for many students who are academically behind, with a limited vocabulary, and/or with limited language skills. By incorporating these practices into the traditional ELA classes, ELs do not miss core instruction.

Additionally, for integrated ELD, Sac High incorporates academic language and supports for students identified as ELs on a daily basis in all classes. Students are able to practice the academic language and utilize strategies to support language development each day, and in each class. These strategies include graphic organizers, chunking of materials, pictorial representation, and other supports.

As needed, Sac High will provide designated ELD instruction for English Learners where the focus will be proficiency with academic English and literacy in content areas. In order to minimize disruption to students' daily schedules, if needed these services take place as an additional class, not a replacement of a core class. Sac High's modified block schedule provides ample time that can be used for additional, intensive English language instruction. This specific instruction includes all of the ELD standards provided with CCSS and as outlined by the CDE.

Furthermore, staff at Sac High will address the needs of students who are struggling with SEI, or may be at the intermediate or lower level of development, by providing, if it is determined to be the best course of action, an ELD class and/or assignment of a certified aide, teacher or qualified consultant under contract who speaks that child's native language. Instruction in ELD classes focuses on increasing basic English so that students can perform and participate in their regular classes.

SUPPORTING ENGLISH LEARNERS

The Sac High community fully appreciates and remains incredibly sensitive to the challenges English learners face, and the Charter School does everything it can to support their needs. Sac High implements strategies as necessary to enable EL students to achieve proficiency and attain the high standards established for all students. The Charter School directly provides or outsources appropriate support services that may be needed by EL students in order to achieve and maintain a satisfactory level of academic performance.

SHPS and Sac High continue to actively recruit staff who speak the foreign language that is most common among the Charter School's students, which is currently Spanish.

In order to have meaningful relationships with parents and students who do not speak English as a first language, the Charter School must be proactive in its communication styles and techniques. This requires creativity through the involvement of translators, community organization support, or other resources. The Charter School is deliberate in accommodating for families who need translating services by including interpreters and translated documents when needed.

RECLASSIFICATION CRITERIA

Sac High has found the combination of Sac High's focus on literacy, and SEI model strategies to be successful with the Charter School's EL population.

English Learners are reclassified as Fluent English Learners when they: 1) demonstrate proficiency by scoring a 4 overall on the Summative ELPAC, 2) reach a proficiency score on the ELA portion of the CAASPP (meets or exceeds standards) or English benchmark scores if the student is not tested due to grade level, 3) demonstrate authentic fluency in class as determined by their regular English teacher and 4) parent opinion and consultation. Much of this evidence is found in student work and through encouraging active participation in class. Students who are re-classified continue to be monitored using the same criteria to ensure no additional support is necessary. This monitoring is done by one or more teachers in conjunction with the administration.

The proficiency of an EL is measured throughout the school year to determine if reclassification is appropriate. Monitoring continues until a student attains fluency in English language proficiency as measured by the four criteria listed in the prior paragraph. In addition, Sac High evaluates each student's performance in academic content areas to measure the student's progress in core subjects. If an EL continues to struggle in these academic areas, modifications to the instructional program may be made. Any student classified and receiving educational services as an EL who subsequently tests high enough to exit the program is deemed RFEP and no longer in need of EL services, although their performance is still monitored for up to four years so support can be provided as needed. No students will exit the EL program unless they can read, write, and comprehend English well enough to participate successfully in Sac High's academic program without the need for additional support.

ACCOUNTABILITY AND EVALUATION OF THE EL PROGRAM

In order to ensure the EL program is achieving the desired results (students are making progress in the acquisition of the English language and making progress academically), an annual evaluation of the program occurs. To determine the need for programmatic modifications, staff at Sac High evaluate the progressive growth of EL students on standardized assessments and non-standardized assessments in comparison to that of non-EL students. Staff also tracks students longitudinally throughout their matriculation to determine if there is significant variation in the academic achievement of students who were once classified EL and non-EL students, as measured by standardized assessments and non-standardized assessments. Sac High and SHPS' staff track how many students are reclassified as EL and the number of instructional years it takes for the reclassification to occur.

Finally, staff at Sac High comply with all provisions outlined in Title III – Language Instruction for Limited English Proficient and Immigration Students. This includes a letter for parent notification (notifying of English proficiency status and program placement) and reporting requirements.

COURSE TRANSFERABILITY AND ELIGIBILITY

In the 2017–18 school year Sac High earned a six-year accreditation from WASC, which certifies the transferability of Sac High's coursework to other public schools. A copy of Sac High's two most recent WASC accreditation letters are provided in Appendix 1. The re-accreditation visit occurred in the Spring of 2024 and an updated accreditation letter will be provided to Sac High prior to the start of the 2024–25 school year. Sac High clearly communicates this information with students and families during the recruitment and orientation process.

Sac High offers a broad range of courses which are approved by the University of California and California State University as creditable under the "A–G" subject requirements. A listing of the Charter School's current "A–G" approved courses is contained in Appendix 1. Sac High's graduation requirements are aligned with the UC/CSU eligibility requirements for all students, except as otherwise noted. Sac High begins talking with students and parents about UC/CSU eligibility requirements and required courses during the recruitment and orientation process, and continues to provide regular updates throughout a student's high school career.

All of Sac High's courses are transferable to other public high schools should a student transfer from the Charter School prior to graduation. The Charter School informs parents about the transferability of Sac High courses to other public high schools in the student-parent handbook.

PARENT EDUCATION AND PARTICIPATION

Sac High parents and families are actively involved in the education of students. In Sac High's experience, The greater parents are involved in the education of their students, the greater achievement those students experience at Sac High.

Studies have shown students whose parents are involved in their education generally have higher grades and test scores, better attendance, more consistently completed homework, higher graduation rates and greater enrollment in postsecondary education. Annually, Sac High facilitates activities that parents and families can engage in together to support strong school-home connections.

In addition, all parents are invited to participate in annual orientations, back to school nights and open houses, all of which provide families an opportunity to get to know teachers, learn about the academic program, and find specific ways to get involved. Orientations review what a typical school day is like, as well as review expectations, preview the school year, and provide the opportunity for families to meet staff. At annual orientations, parents receive an overview of the entire program along with school-wide information. Teachers also meet with parents to preview the year, establish a relationship, and discuss expectations.

Additional activities, such as evening events focused on literacy, STEM, and art, provide opportunities for parents to engage in their child's education through academic activities. Senior portfolio presentations are always a highlight capping student's four years of high school and future plans. Families are invited, with student permission, to observe these presentations as a celebration of the student's cumulative achievements.

Sac High also hosts several events focused on supporting students' access to college resources. This includes the college application process, as well as evenings focused on financial aid and completing the FAFSA. There are multiple sessions held throughout the school year where Sac High students and families learn about scholarship opportunities they can apply for to offset the cost of college. The Charter School also hosts an annual "signing day" where graduating seniors declare which college or university they will be attending following high school. These events provide families and students with the information, and inspiration, to continue their education beyond high school and align with Sac High's mission of supporting all students to graduate high school prepared to earn a four-year degree.



Parents are also provided with a student-parent handbook at the beginning of the school year. This handbook provides detailed descriptions of all aspects of the Charter School's program. The Sac High student-parent handbook is available in Appendix 1.

Parents monitor their child's progress throughout the year through weekly grade reports, quarter and semester report cards and via the Charter School's online student information system. Samples are provided in Appendix 2 & 3. The online system allows families to check on academic progress as often as they like. For students experiencing challenges academically, families are invited to a conference. This provides an initial check-in with the student, family and Sac High staff to ensure expectations are communicated as well as opportunities for support. If a conference is not successful then students may be referred for an SST. The SST process was described earlier in this element of the Petition.

Parents are also invited to complete a survey, at least annually, to provide feedback to Sac High teachers and administration.

In addition, Sac High ensures weekly communication with families which is facilitated through the advisory program. Families know to expect schoolwide communication every Wednesday. This advisory program and weekly communication is a way to ensure consistent school-home communication.

CHARTER SCHOOL GOALS AND ACTIONS TO ACHIEVE THE EIGHT STATE PRIORITIES

Pursuant to Education Code Section 47605(c)(5)(A)(ii), a reasonably comprehensive description of the Charter School's annual goals to be achieved in the Eight State Priorities school-wide and for each pupil subgroup, as described in Education Code Section 52060(d), and specific annual actions to achieve those goals, can be found in the Charter School's Local Control and Accountability Plan ("LCAP"), referenced in the next element of this Petition. The current LCAP is on file with the District and is also available on Sac High's website. It is also included in Appendix 2 & 3.

The Charter School shall annually update and develop the LCAP in accordance with Education Code Section 47606.5 and shall use the LCAP template adopted by the State Board of Education. The Charter School shall submit the LCAP to the District and County Superintendent of Schools annually on or before July 1, as required by Education Code Section 47604.33. The LCAP and any revisions necessary to implement the LCAP shall not be considered a material revision to the charter, and shall be maintained by the Charter School.



ELEMENTS 2 & 3

MEASURABLE PUPIL OUTCOMES & METHODS OF MEASUREMENT



ELEMENTS 2 & 3: MEASURABLE PUPIL OUTCOMES AND METHODS OF MEASUREMENT

Governing Law: The measurable pupil outcomes identified for use by the charter school. "Pupil outcomes," for purposes of this part, means the extent to which all pupils of the charter school demonstrate that they have attained the skills, knowledge, and attitudes specified as goals in the charter school's educational program. Pupil outcomes shall include outcomes that address increases in pupil academic achievement both schoolwide and for all pupil subgroups served by the charter school, as that term is defined in subdivision (a) of Section 52052. The pupil outcomes shall align with the state priorities, as described in subdivision (d) of Section 52060, that apply for the grade levels served by the charter school. Education Code Section 47605(c)(5)(B).

And

Governing Law: The method by which pupil progress in meeting those pupil outcomes is to be measured. To the extent practicable, the method for measuring pupil outcomes for state priorities shall be consistent with the way information is reported on a school accountability report card. Education Code Section 47605(c)(5)(C).



ALIGNMENT OF OUTCOMES TO THE EIGHT STATE PRIORITIES

Pursuant to Education Code Section 47605(c)(5)(B), a reasonably comprehensive description of the Charter School's school-wide and pupil outcome goals and performance targets aligned to the Eight State Priorities that apply for the grade levels served by the Charter School, and methods for measuring progress, can be found in the Charter School's LCAP. The current LCAP is on file with the District and is also available on Sac High's website. It is also included in Appendix 2 & 3.

LOCAL CONTROL AND ACCOUNTABILITY PLAN

In accordance with Education Code Section 47606.5, the Charter School shall comply with all elements of the LCAP pursuant to regulations and a template adopted by the California State Board of Education and reserves the right to establish additional and/or amend school-specific goals and corresponding assessments throughout the duration of the charter term. The Charter School shall submit the LCAP to the District and the County Superintendent of Schools annually on or before July 1, as required by Education Code Section 47604.33. SCHS shall also present a report on the annual update to the LCAP and the local control funding formula budget overview for parents on or before February 28 of each year at a regularly scheduled SHPS Governing Board meeting.



Summary of Methods of Measurement

Assessment	Purpose	Grade	Timeline/ Frequency	Expectation
ELPAC Initial Assessment	The ELPAC IA is used to identify students as either an English Learner, or as fluent in English	9-12 As prescribed	First 30 days of enrollment	Students are identified as either scoring Initially Fluent or English Learner
ELPAC Summative Assessment	The ELPAC SA is to measure how well ELs are progressing with English development in each of the four domains	9-12 Every year until Reclassified as Fluent English Proficient	Once a year	The results are used as one of four criteria to determine if the student is ready to be reclassified as fluent English proficient, to help inform proper educational placement, and to report progress for accountability
CAASPP	State criterion-based assessment in ELA and Math	11	Spring/ Once a year	Student achievement increases annually per goals listed in the current year's LCAP
CAST	State criterion-based assessment in Science	Once in high school	Spring/ Once a year	The number of students scoring as having met or exceeded standard mastery increases annually as per goals listed in the current year's LCAP

CAA	State alternative assessment in ELA, Math, and Science for qualified students	11 for qualified students	Spring/ Once a year	The number of students scoring as having met or exceeded standard mastery increases annually as per goals listed in the current year's LCAP
Internally created test and performance tasks (presentations, papers, projects)	Measure standards mastery across all courses/subjects	9-12	As assigned by teacher	Students show mastery and proficiency in content knowledge
Curriculum Based Assessments	Assess mastery of unit/lesson content	9-12	End of unit	Students show mastery and proficiency in content knowledge
Curriculum Based Benchmarks	Determine progress toward Standard Mastery in grade level core curriculum	9-12	Quarterly	Students demonstrate progress toward Standards Mastery
PFT	State criterion-based assessment in Physical Fitness	9	Spring/ Once a year	Students demonstrate levels of health-related fitness

Smarter Balanced Practice Test	Practice the Smarter Balanced Assessment to familiarize the students with the structure of the SBAC Test	9-11	As assigned by teachers	The number of students showing growth will increase annually. Growth includes both from the prior year to current year and growth over the course of the school year
Smarter Balanced Interim Comprehensive Assessment (ICAs)	Provide students with the same item types and formats of the SBAC to include performance tasks, provide teachers with overall scale score and performance level of each student	9-11	As assigned by teachers	The number of students showing growth will increase annually. Growth includes both from the prior year to current year and growth over the course of the school year
Smarter Balanced Interim Assessment Blocks (IABs)	Provide students an opportunity to show standard mastery on smaller targets for instruction	9-11	As assigned by teacher	The number of students showing growth will increase annually. Growth includes both from the prior year to current year and growth over the course of the school year
AP Exams	Provide students opportunity to earn college credits while still in high school	10-12	As prescribed in May	Students will be exposed to college level assessments while still in high school. Any student scoring a 3, 4 or 5 may receive credit at the college in which they enroll

Research shows effective schools that excel academically consistently monitor students' academic progress and use data to inform and modify instruction. In order to attain the goals set forth in the Charter School's LCAP, and create an environment that maximizes student learning and academic growth, Sac High has established a data and assessment system that allows the Charter School to constantly monitor student performance through a variety of authentic and standardized measures. Underlying the system is an infrastructure that facilitates the effective storage, reporting and analysis of data. Specifically, the Charter School currently uses Infinite Campus and Illuminate, both respected data and assessment tools, to house and track all student achievement data. The Charter School is also currently using the Infinite Campus student information system to store all student data such as demographics, attendance and gradebooks. Sample reports from Infinite Campus are included in Appendix 2 & 3 such as a Report Card, Transcript and Grade Report.

Sac High teachers and staff monitor the progress of student learning to ensure sufficient progress is being made. Assessments (standardized, diagnostic/criterion-referenced, rubrics, portfolio, etc.) inform and drive Sac High's instruction. Student needs and progress are monitored consistently throughout the school year through a system of internal benchmarks and other, more frequent forms of assessment. The internal benchmark assessments are currently given approximately quarterly and enable teachers to measure student learning on a continual basis.

The Charter School regularly reports data on pupil achievement to parents through regular grading periods, reporting of test score results (e.g., CAASPP), and parent conferences. Parents will also have direct access to their child's attendance and academic progress through Infinite Campus.

Pupil achievement data is regularly reported to staff and used to evaluate the efficacy of Sac High's educational program. In 2023-24 Sac High built in over 21 days of professional development as well as weekly meetings to analyze data and inform the academic program.

Appendix 2 & 3 includes documents outlining the process Sac High teachers experience following student completion of a quarterly benchmark exam and how data, including reports from Illuminate, and student results are used to drive and modify instruction.

In addition to what is described above, Sac High strives to align the methods of measuring pupil outcomes and the ways of reporting the results achieved with how it will be displayed on external documents, such as the SARC. Whenever feasible, Sac High will align with the SARC. For example, the SARC currently requires pupil outcome data on CAASPP for ELA and math, CAST for science, percent of graduates meeting UC/CSU requirements, the California Physical Fitness Test, suspension and expulsion data. Each of these metrics is aligned with a goal for Sac High.

A full analysis of Sac High's most recent results and academic achievement is available in the renewal criteria section of this Petition and Appendix A.



ELEMENT 4

GOVERNANCE AND PARENT INVOLVEMENT

ELEMENT 4: GOVERNANCE AND PARENT INVOLVEMENT

Governing Law: The governance structure of the charter school, including, but not limited to, the process to be followed by the charter school to ensure parental involvement. Education Code Section 47605(c)(5)(D).

CHARTER STATUS

Sac High is an independent charter school operated by SHPS, a California Nonprofit Public Benefit Corporation. SHPS and Sac High are governed by the St. HOPE Public Schools' Board of Directors ("Board" or "Board of Directors"). In addition to Sac High, SHPS currently operates and governs St. HOPE Public School 7. Please refer to Appendix 4 for a copy of the SHPS Bylaws, Articles of Incorporation, and Conflict of Interest Code.

LEGAL ASSURANCES

The Charter School will operate autonomously from the District, with the exception of the supervisory oversight as required by statute and other contracted services as negotiated between the District and the Charter School. Pursuant to Education Code Section 47604(d), the District shall not be liable for the debts and obligations of the Charter School, operated by a California non-profit benefit corporation, or for claims arising from the performance of acts, errors, or omissions by the Charter School as long as the District has complied with all oversight responsibilities required by law.

SHPS will comply with the Brown Act, Education Code Section 47604.1(c), the Political Reform Act, and Section 1090, et seq. as set forth in Education Code Section 47604.1. Members of SHPS' Board of Directors, any administrators, managers or employees, and any other committees of the Charter School comply with applicable federal and state laws, and nonprofit integrity standards.

PRIMARY RESPONSIBILITIES OF BOARD OF DIRECTORS

Sac High will be governed by the SHPS Board of Directors who will maintain active and effective governance of the Charter School. The Board is responsible for ensuring the Charter School fulfills its mission, remains true to the terms of the Petition, is a fiscally viable and responsible organization, including ensuring implementation of internal controls including, but not limited to, policies to prevent fraud, embezzlement, and conflict of interest, as well as ensuring access and accountability to the public. The Board of Directors governs the Charter School in its pursuit of its mission, and delegates all managerial decisions to the leadership of SHPS and Sac High. The Board hires, sets compensation for and evaluates the Superintendent, or the equivalent position.

The Superintendent, in consultation with SHPS leadership, hires, sets compensation for, supports and evaluates the Principal, while the Principal hires and evaluates all Sac High teachers and staff. The Principal is responsible for the daily operations, annual, and long-term planning of Sac High, and execution of all aspects of the Charter School's educational program.

The SHPS Bylaws describe the maximum and minimum number of members as well as the qualifications and qualities for members on the Board of Directors.

All board members serve for a term of two years except for any parent, alumni or student representative, who will serve for a term of one year.

Currently, SHPS has a student board member. Moving forward, upon receipt of a petition for student representation that meets the requirements of Education Code Section 47604.2(b)(2), the Board of Directors shall order the inclusion within its membership, in addition to the number of members otherwise prescribed, of at least one student member, should there not already be such a member. A student member of the Board of Directors shall have preferential voting rights as defined in Education Code Section 47604.2(b)(4).

In accordance with Education Code Section 47604(c), one representative of SCUSD may serve on the Board.

Board members participate in training that covers their responsibilities with topics to include, at minimum, conflicts of interest, financial audits, ethics, and the Brown Act.

The Board will meet on a regular schedule as adopted by the Board at a location within Sacramento County, and in accordance with the Brown Act including with respect to the setting and posting of agendas. All meetings are open to the public.

The Board of Directors, and all applicable committees, shall conduct meetings in accordance with the Brown Act and Education Code Section 47604.1(c). Agendas will be posted at least 72 hours prior to regular meetings on the Charter School's website and in hardcopy on the Charter School's campus in a location accessible to the public. Meeting minutes will be posted on the website following Board approval.

SELECTION OF NEW BOARD MEMBERS, NOT INCLUDING THE SCUSD REPRESENTATIVE

A stable, strong, committed, and mission-aligned Board of Directors is critical to the success of the Charter School. Therefore, all potential and new Board members will undergo a careful and deliberate vetting process and will require the vote of the current Board membership in accordance with the SHPS Bylaws. Requirements of new members to the Board of Directors include:

- Deep and unwavering commitment to the mission of SHPS
- Belief that the Charter School will be able to achieve its mission and should take all reasonable steps necessary in order to do so
- Regular attendance at all board meetings
- Expertise in one or more area that proves to be valuable to the governance of the Charter School
- Experience with and interest in working with a committed, driven, diverse group of people
- Willingness to leverage personal and professional networks on behalf of SHPS and/or the Charter School
- Availability and willingness to participate in the governance of SHPS

LEADERSHIP OF SHPS AND SAC HIGH

SHPS Leadership Team

Directed by the Superintendent, the SHPS leadership team, which also includes, among others, the Director of Operations and the Director of Special Education, is responsible for the day-to-day operations of SHPS, and performs such tasks, among others, as approving all major contracts, developing the annual budget, and overseeing the fiscal affairs. Job descriptions for the roles listed here are included in Appendix 5.

The SHPS leadership team, with assistance from the Board of Directors when needed, is also responsible for selecting and evaluating the Sac High principal. The SHPS leadership team also facilitates Sac High's annual programmatic report to SCUSD, helps craft and maintain policies and procedures, and participates in the dispute resolution procedures of the Charter School as necessary. Finally, the SHPS leadership team provides critical support to Sac High and, where necessary, contracts out for various services (e.g., legal and fiscal support, marketing, compliance oversight). The SHPS Special Education department, which currently includes the SHPS Director of Special Education, is also housed centrally by SHPS. The SHPS leadership team is composed of experienced and successful professionals.

Principal

The principal is responsible for day-to-day instruction, culture, and operations of Sac High, directly reports to the Superintendent, or their designee, and presents regularly to the SHPS Board of Directors. The principal manages teachers, staff, and students, maintains relationships with families; and oversees the instructional program, school culture and school operations. A job description for the principal is contained in Appendix 5.

RESPONSIBILITIES OF THE SHPS GOVERNING BOARD AND OF SHPS LEADERSHIP

Governing Board Responsibilities:

- Maintain active and effective governance of the Charter School
- Ensure the Charter School
 - Fulfills its mission
 - Remains true to the terms of the Petition
 - Is a fiscally viable and responsible organization
 - Ensures implementation of internal controls including, but not limited to, policies to prevent fraud, embezzlement and conflict of interest
- Ensure access and accountability to the public
- Hires, sets compensation for and evaluates the Superintendent, or the equivalent position
- Delegates all managerial decisions to the leadership of SHPS and Sac High
- Attend annual professional development for the purposes of training individual board members on their responsibilities with topics to include, at minimum
 - Conflicts of interest
 - Financial audits
 - Brown Act
- Meet on a regular schedule and in accordance with the Brown Act
- Approves budgets for the Charter School as required by the education code

SHPS LEADERSHIP RESPONSIBILITIES, UNDER THE DIRECTION OF THE SHPS SUPERINTENDENT:

- The Superintendent (in coordination with the SHPS leadership team)
 - Hires, sets compensation for, supports and evaluates the principal
 - Is responsible for the day-to-day operations of SHPS, and performs such tasks, among others, as
 - Approving all major contracts
 - Developing the annual budget
 - Overseeing fiscal affairs
 - Facilitates Sac High's annual programmatic report to SCUSD
 - Helps craft and maintain policies and procedures
 - Participates in the dispute resolution procedures of the Charter School as necessary
 - Where necessary, contracts out for various services (e.g., legal and fiscal support, marketing, compliance oversight)
 - Manages the SHPS leadership team, which includes the Sac High principal, as well as operations and special education
- The Principal (either directly or via a designee)
 - Hires, manages and evaluates all Sac High teachers and staff
 - Is responsible for
 - Charter School operations
 - Annual and long-term planning
 - Relationships with students and families
 - The instructional program
 - Executes all aspects of the Charter School's educational program, including
 - Day-to-day instruction
 - Managing school culture
 - Site operations
 - Presents regularly to the SHPS Board of Directors



PARENT AND STUDENT INVOLVEMENT IN GOVERNANCE

The input of all education partners will be valued by the Board as well as the Charter School. As such, education partners will be given the opportunity to address issues on the agenda at all Board meetings, as well as comment and, where appropriate, participate at the committee level. General public comment on any item related to SHPS or the Charter School is also welcome. Further commentary on issues regarding the Charter School is provided to the Charter School's principal as needed.

Sac High remains committed to parent involvement. SHPS has a longstanding Parent/Guardian/Family Involvement Policy outlining parent involvement across all SHPS schools. This policy is reviewed annually for any needed updates and the current version is included in Appendix 4.

Sac High currently has a School Site Council ("SSC") made up of the principal, teachers, staff, parents/community members and a Sac High student which meets on a regular basis. This group meets with the principal to discuss issues involving the Charter School's academics, culture, and community, as well as governance generally. The SSC is an important voice for education partners at the Charter School and one that will help to ensure a comprehensive understanding of how the Charter School is performing. The current SSC roster, a sample calendar and bylaws may be found in Appendix 4.



Families at Sac High also take surveys to provide feedback to the Charter School and identify areas of improvement. In addition to annual surveys, families are asked to participate in the annual development of the Charter School's Single Plan for Student Achievement ("SPSA") and the annual update to the LCAP, both of which may be combined in the future. Furthermore, in the past Sac High has formed parent focus groups to act as sounding boards for potential adjustments or improvements to the Charter School's program. Focus groups were especially helpful as sources of parent input as the Charter School determined how to best respond to the COVID-19 pandemic. Additional opportunities are outlined in Element 1 of this Petition.

Sac High complies with all applicable requirements for parental notification as well as provides opportunities for parents to request records and teacher and/or paraprofessional requirements. In addition, the Charter School will disseminate school-wide information through multiple means (i.e., onsite postings, mail, email, phone calls, notices sent home through students, the school website and social media). This includes the LCAP/SPSA, Parent/Guardian/Family Involvement Policy, the SARC, and other required notices, policies, and documents. Sac High hosts an annual Title I meeting as required and all families are made aware of the day and time of this meeting.

SHPS has established a written complaint procedure that is available to all parents and provides parents with the opportunity to make suggestions, as well as voice dissenting views, through formal and informal means. This policy is in Appendix 14. Parents are also encouraged to address their questions and concerns informally with staff prior to any formal complaint process.

In order to inform parents of their individual student's progress, the Charter School regularly reports academic and non-academic (e.g., behavior, attendance) progress to parents through regular grading periods, reporting of test score results, and parent conferences. Parents also have online access to their child's attendance and academic progress, currently through Infinite Campus. Currently all Sac High staff are issued SHPS email addresses to allow for ongoing parent-teacher-school communication.

Additional opportunities for parent and family involvement, with a focus on supporting their child's academic progress, can be found in Element 1 of this Petition. Element 1, as well as Elements 2 & 3 also outlines how parents are kept informed of their child's academic progress throughout the year.

STUDENT SENATE

Composed of student representatives from each grade level, including elected school-wide officers, the Student Senate is the student governance organization on campus. Student Senate meets regularly and oversees student body funds, campus clubs and organizations, and coordinates dances and spirit events. Student Senate is also responsible for serving as the voice for students on campus, which requires regular communication with constituents about student and school issues as well as gathering feedback and input. For further information about Student Senate refer to Appendix 4.

CONFLICT OF INTEREST CODE

The Board has adopted a Conflict of Interest Code which can be found in Appendix 4. SHPS shall comply with the Public Records Act ("PRA") and Section 1090, as set forth in Education Code Section 47604.1, as well as Corporations Code Conflicts of Interest rules. The Conflict of Interest Code shall be updated with any charter school specific conflicts of interest laws or regulations. Any updated Conflict of Interest Code, as required, will be submitted for approval to the Sacramento County Board of Supervisors.

NON-DISCRIMINATION

Sac High and SHPS have implemented specific and continuing steps to notify applicants for admission and employment, students and parents of secondary school students, employees, and sources of referral of applicants for admission and employment that it does not discriminate on the basis of sex or mental or physical disability in the educational program or activity which it operates, and that it is required by Title IX and Section 504 not to discriminate in such a manner.

RESPONDING TO INQUIRIES

Any general inquiries of the Charter School can be directed to the Charter School's principal. Inquiries directed specifically to the Board are handled by the communications representative of the Board or the Board Chair, should those individuals be different parties. Furthermore, SHPS and Sac High comply with the PRA.

PROCESS FOR MATERIAL REVISIONS TO THE PETITION

Sac High shall comply with Education Code Sections 47605 and 47607 with respect to any changes to its Petition that are subject to material revision.



ELEMENT 5

EMPLOYEE QUALIFICATIONS



ELEMENT 5: EMPLOYEE QUALIFICATIONS

Governing Law: The qualifications to be met by individuals to be employed by the charter school. Education Code Section 47605(c)(5)(E).

Sac High's staff consists of committed professionals who provide all children with an excellent educational program. All staff members are and will continue to be committed to the mission and vision of Sac High and will work diligently to assure they are accomplished. All staff members will be actively involved in the planning, performance, administration, and evaluation of the instructional program and the operation of the Charter School.

EQUAL OPPORTUNITY EMPLOYER

St. HOPE Public Schools is an equal opportunity employer and does not discriminate based upon the actual or perceived characteristics of race, creed, color, gender, gender identity, gender expression, nationality, religion, age, national origin, ancestry, ethnic group identification, genetic information, medical condition, physical or mental disability, marital status, sexual orientation, sex and pregnancy, childbirth or related medical conditions, military or veteran status, denial of family and medical care leave, or on the basis of a person's association with a person or group with one or more of these actual or perceived characteristics, or any other basis protected by federal, state, local law, ordinance or regulation.

STAFF QUALIFICATIONS

Leadership at Sac High strives to hire candidates who have a wide range of skills and leadership qualities, teaching and administrative experience, cultural and ethnic backgrounds, and be as reflective of the Sacramento community and the student body as possible. It is equally important all staff members are committed to the mission of the Charter School and will contribute positively to that mission. General qualifications for all employees include:

- Ability to work with others in a team
- Flexibility
- Experience with technology
- Strong written and verbal communication skills
- Administrative skills
- Interest in seeking out productive, collegial interaction and professional growth
- Exemplification and embodiment of the Charter School's core values of integrity, perseverance, dignity, pride, respect and compassion
- Ability to successfully work with Sac High's target population
- A relentless drive and commitment to eliminate the disparity of educational quality that exists
- Belief in and alignment with SHPS' mission

ADMINISTRATOR QUALIFICATIONS

Administrators at Sac High possess a comprehensive educational vision that is consistent with the mission and vision of the Charter School, skill in hiring and supervising excellent teachers, a familiarity with charter schools and the target student population, technological literacy, and management experience.

In addition to the qualifications described above for all staff, SHPS currently has the following, additional qualifications for administrators:

- Proven leadership skills and experience supervising and evaluating the performance of assigned staff
- Knowledge of exemplary teaching and the capacity to distinguish among various teaching abilities and experience
- Exceptional availability to manage people and complex projects
- Outstanding communication and interpersonal skills
- Strong strategic thinking and problem solving capabilities

JOB DESCRIPTIONS AND QUALIFICATIONS FOR KEY PERSONNEL

Job descriptions for the positions listed below are provided in Appendix 5 and outline the key positions at the Charter School, including the position's qualifications and responsibilities. Job descriptions will be revised as necessary to reflect the needs of the Charter School.

- Superintendent
- Director of Operations
- Director of Special Education
- Principal
- Instructional Coach
- Teacher, Single Subject
- Education Specialist
- Director of Recruitment
- Human Resources Manager

Superintendent

- Bachelor's Degree
- Preferred Master's degree, Ed.D or PhD in education or related field
- Three or more years teaching experience preferred.
- Four or more years of management or supervisory experience, preferably in an education or related field.
- A track record of outstanding success as a senior leader in an urban school setting.
- Experience as a principal and teacher in an urban district preferred.
- Demonstrated commitment to improving urban schools and driving education reform.
- A deeply held belief that all children can learn and achieve at high levels regardless of race, ethnicity, or socio-economic background.
- Strong alignment with St. HOPE Public Schools' mission and sense of awareness and ownership of action.
- Strategic thinker with proven ability to execute effectively against strategy.

- Experience with building for scale, developing and/or implementing new systems.
- Experience in managing and coaching principals in varied instructional and operational strategies.
- Demonstrated qualities of leadership, ability to speak and write effectively, broad knowledge and skill in curriculum development and educational planning with emphasis at the secondary level.
- Experience managing teams across the functional areas, and across sites, to develop and implement systems and processes to increase the effectiveness and efficiency of a complex organization.
- Demonstrated ability to hire quality employees, motivate, and lead teams, and work effectively as part of a team.
- Knowledgeable of best practices in the field and able to skillfully disseminate those practices to stakeholders.
- Strong project management skills and ability to solve complex problems.
- Significant experience using data to drive academic achievement.
- Thrives in an entrepreneurial, fast-paced work environment; innovative thinker.
- Ability to use technology for communication and analysis including Microsoft Word, Excel, and PowerPoint, Google Mail and Google Calendars.

Principal

- Bachelor's degree.
- Teaching Credential.
- Proven leadership skills and experience supervising and evaluating the performance of assigned staff.
- Knowledge of exemplary teaching and the capacity to distinguish among poor, mediocre, solid and outstanding teaching.
- Exceptional availability to manage people and complex projects.
- Outstanding communication and interpersonal skills.
- Strong strategic thinking and problem solving capabilities.
- Knowledge of laws, regulations, rules, and policies governing SHPS and the ability to apply them with good judgment.
- *Highly Desired (but not required)*:
 - Master's Degree in Education and/or Administrative Credential.
 - Bilingual speaking, reading, and writing abilities (Spanish).

Director of Operations

- Experience in complex systems, fast-paced environments, strategic planning and management, and communications are all valued.
- Successful candidates will have demonstrated outcomes and impact.
- Self-directed, resourceful and comfortable operating in ambiguity.
- Exudes strong communication skills in speaking, listening and writing.
- Experienced multitasker with strong organizational skills.
- Bachelor's Degree

Director of Special Education

- Bachelor's degree.
- Teaching Credential.
- Proven leadership skills and experience supervising and evaluating the performance of assigned staff.
- Knowledge of exemplary teaching and the capacity to distinguish among poor, mediocre, solid and outstanding teaching.
- Exceptional availability to manage people and complex projects.
- Outstanding communication and interpersonal skills.
- Strong strategic thinking and problem solving capabilities.
- Knowledge of laws, regulations, rules, and policies governing SHPS and the ability to apply them with good judgement.
- *Highly Desired (but not required)*:
 - Master's Degree in Education and/or Administrative Credential
 - Bilingual speaking, reading, and writing abilities (Spanish).

Instructional Coach

- Bachelor's Degree.
- Valid California Single Subject teaching credential in the applicable subject.
- Appropriate EL authorization to teach EL or SDAIE.
- Examples of a relentless drive and commitment to eliminate the disparity of educational quality that exists.
- Proven track record of success in the classroom.
- *Highly Desired (but not required)*:
 - Understanding and experience working with the nuances of urban school environments and school culture.
 - Bilingual speaking, reading, and writing abilities (Spanish).



Education Specialist

- Holds a valid California Education Specialist credential (mild/moderate).
- Have demonstrated success in the classroom.
- All areas of special education including: behavior management techniques, learning theories, curriculum development and vocational development.
- Current laws and regulations pertaining to students with disabilities.
- Policies and procedures pertaining to IEP's.
- Assessment practices and statistics relevant to the behavioral sciences.
- Collaboration with administrators, teachers, classified personnel, parents and students.
- Plan, organize; and prepare IEP's, behavior and transition plans as appropriate.
- Exercise initiative and possess mature judgment.
- Previous experience overseeing services or programs for children with special needs.
- Highly Desired (but not required):
 - At least 2 years of full-time relevant subject teaching experience in an urban, underserved community.
 - Bilingual speaking, reading, and writing abilities (Spanish).
 - Leadership and/or counseling experience and/or ability to teach enrichment classes (ex: music, art, sports).

Director of Student and Staff Recruitment

- Strong ability to execute.
- Strategic thinking and problem solving skills combined with ability to develop and implement systems.
- Self-starter.
- Self motivated.
- Driven by progress and results.
- Takes initiative.
- Proactive and focused on providing excellent customer service.
- Outstanding communication and interpersonal skills.
- Ability to organize workload independently and set priorities; to adapt quickly to changing priorities; and perform.
- multiple interrelated tasks under deadline pressures.
- Strong team-orientation and collaborative nature.
- Strong computer skills in Microsoft Word, Excel, Google Docs, and Google Calendar.
- Ability to influence and motivate adults.
- Focused on results.
- Experience in Education and teaching to best support with recruiting qualified staffing candidates.
- Bachelor's degree.
- California Teaching Credential, or permit, along with a minimum of 3 years teaching experience.
- Minimum of one year full time experience in marketing, recruitment, or working in a K-12 setting.
- Ability and willingness to travel regionally and nationally to attend recruitment events several times per year.
- Have own transportation to travel between school sites to attend interviews and meetings.

- Experience in an urban charter school is preferred.
- Two years of experience in recruitment or admissions in a school setting.
- California Teaching Credential, or permit, along with a minimum of 3. years teaching experience
- Highly Desired (but not required):
 - Two years of experience as a teacher, school counselor or administrator in a K-12 is strongly preferred.
 - Experience in an entrepreneurial organization is preferred
 - Bilingual (Spanish).

Human Resources Manager

- High School Diploma.
- Associates Degree.
- Outstanding communication and interpersonal skills.
- Excellent organization, time management, and follow-up skills along with ability to prioritize and demonstrate an appropriate sense of urgency.
- Strong team-orientation and collaborative nature.
- Strong attention to detail.
- Ability to work in a fast-paced, demanding environment.
- Capability to learn new data systems quickly and accurately
- Experience with HR related work.
- Highly Desired (but not required):
 - Bachelor's Degree.
 - Bilingual speaking, reading, and writing abilities (Spanish).
 - Experience in California teacher credentialing is preferred.
 - Experience in public school education/charter schools is preferred.



Requirements for Teachers

Pursuant to Education Code Sections 47605(l) and 47605.4(a) teachers in the Charter School will be required to hold the CTC certificate, permit, or other document required for the teacher's certificated assignment. These documents shall be maintained on file by SHPS and are subject to periodic inspection by the District. The Board may use local assignment options authorized in statute and regulations for the purpose of legally assigning certificated teachers, in accordance with all of the requirements of the applicable statutes or regulations in the same manner as a governing board of a school district. The Charter School shall have authority to request an emergency permit or a waiver from the Commission on Teacher Credentialing for individuals in the same manner as a school district.

A teacher must have:

- Bachelor's degree
- Valid California Multiple Subjects teaching credential
- Appropriate EL authorization to teach EL or SDAIE
- Examples of a relentless drive and commitment to eliminate the disparity of educational quality that exists
- *Highly Desired (but not required):*
 - Understanding and experience working with the nuances of urban school environments and school culture
 - Bilingual speaking, reading, and writing abilities (Spanish)

Hiring Protocol

- The Superintendent, or their designee, hires the Principal after consulting with the SHPS Leadership Team and others (e.g. school staff, students, parents) relative to the candidate profile that would best meet the needs of the Charter School.
- All other staffing decisions will be made by the principal or the principal's designee unless the position is a member of the Special Education Team, which is hired by the SHPS Director of Special Education in collaboration with the principal.

All teaching applicants submit copies of their credentials or their transcripts as part of their application. All college and/or university transcripts are also required to be submitted by all applicants and kept on file for review.

STAFF SELECTION

To ensure selection of the highest quality staff, the following staff selection process is currently implemented at Sac High:

- Posting of job openings (online, through referrals, and e-mail)
- Use of teacher recruitment programs and career fairs
- Request of a resume, cover letter, and short essay responses
- Credential verification
- Phone interview
- Sample teaching lesson or performance task followed by debrief with Principal and/or administrator(s)
- Verification previous employment, state and federal background checks, and professional and personal reference checks of strong candidates
- SHPS will make an offer of employment to the strongest candidate(s)

SHPS currently employs a Director of Recruitment who focuses on attracting and onboarding both staff and students. A Human Resources Manager screens and reviews all application materials and information from employment candidates to support SHPS in attracting and hiring the most qualified employees from the applicant pool.

RECORDKEEPING AND MINIMIZATION OF USE OF EMERGENCY CREDENTIALLED TEACHERS

SHPS maintains current copies of all teacher credentials and ensures they are readily available for inspection. Sac High will take all steps necessary to minimize the use of teachers holding emergency credentials, including active recruitment of duly credentialed teachers through EdJoin, additional online education job boards, local media advertisements and other recruitment methods. Sac High will seek to maintain a potential list of credentialed teachers from which to draw in the case of a teacher vacancy during the school year.

SHPS implements credential agreements for instructional staff in the process of obtaining their credential in order to meet required deadlines. SHPS' human resources team supports educators in the credential process as they navigate the system in order to become fully credentialed.

The Sac High Principal or designee, in conjunction with SHPS, will ensure credentials are processed and maintained in accordance with applicable legal requirements. Credentials will be reviewed during the hiring process for new staff and reviewed on an annual basis for all staff. All credential materials will be maintained by SHPS.

STAFF COMPENSATION AND BENEFITS

SHPS strives to employ the best staff possible and providing a strong compensation package is part of the formula to attract, hire and retain outstanding educators who can make a difference in student achievement. SHPS is continually exploring ways to offer improved support for its employees including competitive compensation and excellent benefits.

St. HOPE Public Schools has adopted a salary schedule for the Charter School's Administration, teachers and staff. Salaries at the school-level are set in alignment with SHPS salary scales and policies, based on the candidate's experience and responsibilities. The salary of the principal is set by the SHPS Superintendent using a similar process.

A comprehensive benefits package is included as part of each full-time employee's compensation.

PERFORMANCE EVALUATION

All Sac High staff members are currently evaluated by their supervisors at least once a year. Annual goals and objectives are developed jointly by each staff member and the supervisor in accordance with the mission and vision of Sac High. If a staff member is having difficulties achieving their goals, the supervisor provides appropriate support and training.

ADDITIONAL INFORMATION

Sac High has included the materials for the Charter School's Summer new employee orientation and summer staff training in Appendix 5.





ELEMENT 6

HEALTH AND SAFETY PROCEDURES



ELEMENT 6: HEALTH AND SAFETY PROCEDURES

Governing Law: The procedures that the charter school will follow to ensure the health and safety of pupils and staff. These procedures shall require all of the following:

(i) That each employee of the charter school furnishes the charter school with a criminal record summary as described in Section 44237.

(ii) For all schools, the development of a school safety plan, which shall include the safety topics listed in subparagraphs (A) to (K), inclusive, of paragraph (2) of subdivision (a) of Section 32282. For schools serving pupils in any of grades 7 to 12, inclusive, the development of a school safety plan shall also include the safety topic listed in subparagraph (L) of paragraph (2) of subdivision (a) of Section 32282.

(iii) That the school safety plan be reviewed and updated by March 1 of every year by the charter school.

Education Code Section 47605(c)(5)(F).

In order to provide safety for all students and staff, Sac High has adopted and implemented full health and safety procedures and risk management policies for the campus in consultation with SHPS insurance carriers and risk management experts. The health and safety procedures are reviewed regularly and, where appropriate, done so in consultation with staff and parents. Necessary policies and procedures are distributed to all staff via the staff handbook (located in Appendix 6) and, as needed, to parents in the student/parent handbook (located in Appendix 1).

FACILITY SAFETY

Sac High complies with Education Code Section 47610 by utilizing facilities that are compliant with the Field Act. Sac High maintains readily accessible records for such compliance.

Sac High currently occupies District facilities.

SCHOOL SAFETY PLAN

The Charter School shall adopt a School Safety Plan, to be reviewed and updated by March 1 of every year, which shall include identifying appropriate strategies and programs that will provide or maintain a high level of school safety and address the Charter School's procedures for complying with applicable laws related to school safety, including the development of all of the following pursuant to Education Code Section 32282(a)(2)(A)-(L):

- Child abuse reporting procedures
- Routine and emergency disaster procedures
- Policies for students who committed an act under Education Code Section 48915 and other Charter School-designated serious acts leading to suspension, expulsion, or mandatory expulsion recommendations
- Procedures to notify teachers of dangerous students pursuant to Education Code Section 49079
- A discrimination and harassment policy consistent with Education Code Section 200
- Provisions of any school wide dress code that prohibits students from wearing "gang-related" apparel, if applicable
- Procedures for safe ingress and egress of pupils, parents, and employees to and from the Charter School
- A safe and orderly environment conducive to learning
- The rules and procedures on school discipline adopted pursuant to Education Code Sections 35291, 35291.5, 47605, and 47605.6
- Procedures for conducting tactical responses to criminal incidents
- Procedures to assess and respond to reports of any dangerous, violent, or unlawful activity that is being conducted or threatened to be conducted at the school, at an activity sponsored by the school, or on a school bus serving the school
- A protocol in the event a pupil is suffering or is reasonably believed to be suffering from an opioid overdose

The School Safety Plan shall be drafted specifically to the needs of the facility in conjunction with law enforcement and fire response personnel. Staff shall receive training in emergency response, including appropriate "first responder" training or its equivalent.

Disaster procedures included in the School Safety Plan shall address and include adaptations for students with disabilities, in compliance with ADA requirements. To the extent an employee, parent/guardian, educational rights holder, or student brings concerns regarding the procedures to the principal and, if there is merit to the concern, the principal shall direct the School Safety Plan to be modified accordingly.

COMPLIANCE WITH SAFETY REQUIREMENTS ASSURANCE

Sac High's facilities and all modifications made to its facilities will comply with state building codes, ADA access requirements, and other applicable fire, health and structural safety requirements, and will maintain on file readily accessible records documenting such compliance.

FIRE, EARTHQUAKE, LOCKDOWN, SHELTER IN PLACE AND AND EVACUATION DRILLS

Students and staff participate in drills to prepare for what to do in the case of an earthquake, lockdown, Shelter in Place and Evacuation. As indicated above, the Charter School has a safety plan which is kept on file for review. Charter School staff is trained annually on the safety procedures outlined in the plan.

The Charter School agrees to continue to partner with the District for ongoing testing of the facility's sprinkler systems, fire extinguishers and fire alarms annually at its facilities to ensure they are maintained in an operable condition at all times.

PROCEDURES FOR BACKGROUND CHECKS

Sac High follows clear procedures to ensure the health and safety of pupils and staff. These procedures include the requirement that each employee of the Charter School and contractor working with students furnish the Charter School with a criminal record summary as required by Education Code Sections 44237 and 45125.1. Applicants for employment must submit two sets of fingerprints to the California Department of Justice for the purpose of obtaining a criminal record summary. Sac High shall not hire any person, in either a certificated or classified position, who has been convicted of a violent or serious felony except as otherwise provided by law, pursuant to Education Code Sections 44830.1 and 45122.1. SHPS shall monitor compliance with this policy. Volunteers who will volunteer outside of the direct supervision of a credentialed employee shall be fingerprinted and receive background clearance prior to volunteering without the direct supervision of a credentialed employee.

EMPLOYEE RECORDS

The Charter School complies with all applicable state and federal laws concerning the maintenance and disclosure of employee records.

ROLE OF STAFF AS MANDATED CHILD ABUSE REPORTERS

All SHPS and Sac High employees are mandated child abuse reporters and follow all applicable reporting laws, the same policies and procedures used by the District. All employees are provided annual training on child abuse reporting in accordance with Education Code Section 44691. This training covers how the law defines abuse and neglect, what is required of a child abuse mandated reporter, legal protections of a mandated reporter, how to spot child abuse and the steps in making a report of child abuse and/or neglect. Staff complete an assessment following each training to ensure a minimum level of competency and to verify completion of the course.

TUBERCULOSIS RISK ASSESSMENT AND EXAMINATION

All Sac High employees and volunteers who have prolonged contact with students will be assessed and, if necessary, examined for tuberculosis prior to commencing employment and working with students, and for employees at least once each four years thereafter, as required by Education Code Section 49406.

IMMUNIZATIONS

All students enrolled are required to provide records documenting immunizations as is required at public schools pursuant to Health and Safety Code Sections 120325-120375, and Title 17, California Code of Regulations Sections 6000-6075.

MEDICATION IN SCHOOL

Sac High adheres to Education Code Section 49423 regarding administration of medication in school. The Charter School will adhere to Education Code Section 49414 regarding epinephrine auto-injectors and training for staff members.

Per AB 1651 (2023), the Charter School shall store emergency epinephrine auto-injectors in an accessible location upon need for emergency use and include that location in annual notices required by law.

To the extent the Charter School maintains a stock of albuterol inhalers to respond to respiratory distress in students, the Charter School shall comply with the requirements of Education Code Section 49414.7, including with respect to training, notices, and the stocking of albuterol inhalers.

VISION, HEARING/SCOLIOSIS

Students are screened for vision and hearing. Sac High adheres to Education Code Section 49450, et seq., as applicable to the grade levels served by the Charter School.

BLOODBORNE PATHOGENS

Sac High meets state and federal standards for dealing with bloodborne pathogens and other potentially infectious materials in the workplace. The Board established a written infectious control plan designed to protect employees and students from possible infection due to contact with blood borne viruses, including human immunodeficiency virus ("HIV") and hepatitis B virus ("HBV"). Whenever exposed to blood or other bodily fluids through injury or accident, staff and students follow the latest medical protocol for disinfecting procedures. All staff members receive annual training on the Charter School's policy on bloodborne pathogens.

DRUG FREE/ALCOHOL FREE/SMOKE FREE ENVIRONMENT

Sac High functions as a drug-, alcohol-, and tobacco-free environment.

COMPREHENSIVE ANTI-DISCRIMINATION AND SEXUAL HARASSMENT POLICIES AND PROCEDURES

Sac High is committed to providing a school that is free from discrimination and sexual harassment, as well as any harassment based upon the actual or perceived characteristics of race, ethnicity, religion, creed, color, gender, gender identity, gender expression, nationality, national origin, ancestry, ethnic group identification, genetic information, age, medical condition, marital status, sexual orientation, pregnancy, physical or mental disability, childbirth or related medical conditions, military and veteran status, denial of family and medical care leave, or any other basis protected by federal, state, local law, ordinance or regulation. SHPS has developed a comprehensive policy to prevent and immediately remediate any concerns about discrimination or harassment at Sac High (including employee to employee, employee to student, and student to employee misconduct). Misconduct of this nature is very serious and is addressed in SHPS' staff handbook located in Appendix 6.

A copy of the policy, as well as SHPS' uniform complaint policy, shall be provided as part of any orientation program conducted for new and continuing pupils at the beginning of each quarter, semester, or summer session, as applicable, and to each faculty member, all members of the administrative staff, and all members of the support staff at the beginning of the first quarter or semester of the school year, or at the time there is a new employee hired. The Charter School has created a poster that notifies students of the applicable policy on sexual harassment in accordance with Education Code Section 231.6, and shall prominently and conspicuously display the poster in each bathroom and locker room at the schoolsite and in public areas at the schoolsite that are accessible to, and commonly frequented by, pupils. The Charter School shall re-post these posters quarterly as needed.

SCHOOLS MEALS

The Charter School shall provide breakfast and lunch free of charge during each school day to any pupil who requests a meal without consideration of the pupil's eligibility for a federally funded free or reduced-price meal, with a maximum of one free meal for each meal service period. The meals provided under this paragraph are nutritionally adequate meals that qualify for federal reimbursement.

The Charter School shall provide each student adequate time to eat as determined by the Charter School in consideration of available guidance.

FOOD SERVICE AND OTHER AUXILIARY SERVICES SAFETY

Sac High, through SHPS, contracts with an outside agency for its food service needs. SHPS is responsible and accountable for filing all documents necessary for operating the food service program, as well as for reimbursement from the State. SHPS ensures its auxiliary services such as food services, transportation, custodial services are safe and free from hazardous materials.

ASBESTOS MANAGEMENT

Sac High occupies facilities that comply with the Asbestos requirement as cited in the Asbestos Hazard Emergency Response Act ("AHERA), 40 CFR part 763. AHERA requires that any building leased or acquired that is to be used as a school or administrative building shall maintain an asbestos management plan.

SUICIDE PREVENTION POLICY

The Charter School maintains a policy on student suicide prevention in accordance with Education Code Section 215. The Charter School shall review, at minimum every fifth year, its policy on pupil suicide prevention and, if necessary, update its policy. Pursuant to AB 58 (2021-22), the Charter School will also review and update its suicide prevention policy by January 1, 2025 to incorporate best practices identified by the California Department of Education's model policy, as revised.

MENTAL HEALTH INFORMATION

The Charter School has created and posted a poster at the school site identifying approaches and resources addressing student mental health in compliance with Education Code Section 49428.5. The poster shall be displayed in English and the primary language(s) spoken by 15 percent or more of students enrolled at the school site. The poster shall be prominently and conspicuously displayed in appropriate public areas that are accessible to, and commonly frequented by, students at the school site. The poster shall also be digitized and distributed online to students through social media, internet websites, portals, and learning platforms at the beginning of each school year.

MENTAL HEALTH EDUCATION

If the Charter School offers one or more courses in health education to students, the Charter School shall include in those courses instruction in mental health that meets the requirements of Education Code Section 51925, et seq.

PREVENTION OF HUMAN TRAFFICKING

The Charter School informs parents and guardians of students in grades 9 through 12 of human trafficking prevention resources.

CALIFORNIA HEALTHY YOUNG ACT

The Charter School shall teach sexual health education and HIV prevention education to students, at least once, pursuant to the California Healthy Youth Act (Education Code Section 51930, et seq.).

BULLYING PREVENTION

The Charter School has adopted procedures for preventing acts of bullying, including cyberbullying. The Charter School shall annually make available the online training module developed by the CDE pursuant to Education Code Section 32283.5(a) to certificated school site employees and all other school site employees who have regular interaction with children.

HOMICIDE THREATS

The Charter School shall comply with all requirements under Education Code Sections 49390–49395 regarding mandatory reporting in response to homicidal threats. All employees and Board members who are alerted to or who observe any threat or perceived threat in writing or through an action of a student that creates a reasonable suspicion that the student is preparing to commit a homicidal act related to school or a school activity shall make a report to law enforcement.

GUN SAFETY NOTICE

At the beginning of the first semester, the Charter School shall distribute a notice to the parents/guardians of each student addressing California's child gun access prevention laws and laws related to firearm safety utilizing the most updated model language published by the California Department of Education.

FEMININE HYGIENE PRODUCTS

The Charter School stocks the restrooms at all times with an adequate supply of menstrual products, available and accessible, free of cost, in all women's restrooms and all-gender restrooms, and in at least one men's restroom. The Charter School posts a notice regarding the requirements of Education Code Section 35292.6 in a prominent and conspicuous location in every restroom required to stock menstrual products, as specified. This notice includes the text of Education Code Section 35292.6 and contact information, including an email address and telephone number, for a designated individual responsible for maintaining the requisite supply of menstrual products

ATHLETIC PROGRAMS

The Charter School complies with all applicable laws related to health and safety policies and procedures surrounding athletic programs at charter schools, including but not limited to providing information to athletes regarding sudden cardiac arrest and annually providing each athlete an Opioid Factsheet for Patients. In the event the Charter School participates in any interscholastic athletic programs, it shall comply with all applicable requirements, including, but not limited to, adopting a written emergency action plan for sudden cardiac arrest or other medical emergencies related to athletic programs, and acquiring at least one automated external defibrillator.

Further, the Charter School's emergency action plan shall describe the location of emergency medical equipment and include a description of the manner and frequency at which the procedures to be followed in the event of sudden cardiac arrest and other medical emergencies, including concussion and heat illness will be rehearsed. Coach training shall include recognition of the signs and symptoms of and responding to concussions, heat illness, and cardiac arrest.

In the event the Charter School participates in the California Interscholastic Federation, it shall post on its website a standardized incident form as developed by the CDE to receive complaints of racial discrimination, harassment, or hazing alleged to occur at high school sporting games or sporting event and shall include instructions on how to submit a completed incident form consistent with Education Code Section 33353.

WORKPLACE VIOLENCE PREVENTION PLAN

As of July 1, 2024, the Charter School shall establish, implement, and maintain, at all times in all work areas, an effective workplace violence prevention plan consistent with the requirements of Labor Code Section 6401.9.

SUPPORTING LGBTQ+ STUDENTS

Commencing with the 2025-26 school year and ending with completion of the 2029-30 school year, the Charter School shall use an online training delivery platform and curriculum to provide at least 1 hour of required LGBTQ cultural competency training annually to teachers and other certificated employees and maintain records of such training as required by Education Code Section 218.

RECESS

Except where a field trip or other educational program is taking place, if the Charter School provides recess, then pursuant to Education Code Section 49056, the Charter School shall provide supervised and unstructured recess, distinct from physical education courses and mealtimes, of at least 30 minutes on regular instructional days and at least 15 minutes on early release days. The Charter School shall not restrict a student's recess unless there is an immediate threat to the physical safety of the student or one or more of their peers.

ALL GENDER RESTROOMS

On or before July 1, 2026, the Charter School shall provide and maintain at least one all-gender restroom for voluntary student use at each of its schoolsites that has more than one female restroom and more than one male restroom designated exclusively for student use. The restroom shall have signage identifying the bathroom as being open to all genders, it shall remain unlocked, unobstructed, and easily accessible by any student, and be available during school hours and school functions when students are present. The Charter School shall designate a staff member to serve as a point of contact and to post a notice regarding these requirements.

PREGNANT AND PARENTING STUDENTS

SHPS shall provide an annual notice to students about their rights regarding pregnancy or when parenting in compliance with Education Code Sections 222.5, and 46015.

TRANSPORTATION SERVICES

The Charter School shall comply with the requirements of Education Code Section 39875(c), if applicable, relating to background checks and testing for individuals providing transportation services for students.



ELEMENT 7

STUDENT POPULATION BALANCE



ELEMENT 7: STUDENT POPULATION BALANCE

Governing Law: The means by which the charter school will achieve a balance of racial and ethnic pupils, special education pupils, and English learner pupils, including redesignated fluent English proficient pupils, as defined by the evaluation rubrics in Section 52064.5, that is reflective of the general population residing within the territorial jurisdiction of the school district to which the charter petition is submitted. Education Code Section 47605(c)(5) (G).

STUDENT POPULATION AT SAC HIGH

SHPS and Sac High strive to enroll a diverse student body reflective of the District and the Sacramento community. SCHS will continue to strive to achieve a student population with a balance of racial and ethnic students, special education students, and English Learner students, including redesignated ELs, that reflects the general population residing in the territorial jurisdiction of the District.

To achieve this goal, the Charter School focuses on both recruitment and accessibility. Furthermore, in order to recruit such a student population, the Charter School will annually examine the general population of the District and compare it to the enrollment of Sac High. Following this comparison, under- and over-represented student subgroups will be noted, and recruitment efforts will be adjusted to address any imbalances observed. For example, if a certain group of students is identified as underrepresented at Sac High, recruitment efforts will be adjusted to increase outreach to that subgroup with the desired result being increased applications and eventually increased enrollment of that subgroup at the Charter School.

RECRUITMENT OF ACADEMICALLY LOW-ACHIEVING AND ECONOMICALLY DISADVANTAGED STUDENTS

Sac High is open to all students residing in California but will continue to focus student recruitment in Oak Park and the surrounding neighborhoods in the area of south Sacramento to ensure recruitment of traditionally low-achieving and socioeconomically disadvantaged students. Sac High will ensure its admission preferences do not prevent the Charter School from enrolling its target student population.

RECRUITMENT PLAN

Recruitment efforts are focused on accessibility and outreach, both of which are discussed below. The impact of these efforts has increased the diversity at Sac High.

SHPS and Sac High will continue to implement a comprehensive recruitment strategy focused on informing as many families as possible about the Charter School's program including, specifically, underrepresented students to achieve a balance of racial and ethnic students, special education students, and ELs, including RFP students. SHPS currently employs both a Director of Recruitment, who focuses on attracting and onboarding both staff and students, and a student admissions team, including staff who are bilingual in English and Spanish. This team ensures recruitment efforts are comprehensive.

In regard to accessibility, Sac High has made strides to ensure enrollment in the Charter School is available to all prospective students. This includes the subgroups, as identified by the Charter School, where an increase in enrollment is desired in order to achieve the student population balance described above.

These practices are especially effective at attracting economically disadvantaged students as the Charter School has found that removing obstacles and making the enrollment process more accessible has greatly assisted families in applying. Sac High has included its enrollment policy in Appendix 8. The policy can also be made available in other languages as needed. This policy can be found on the Charter School's website as well as at each of the SHPS schools.

Sac High includes information about the Charter School's full inclusion special education model in outreach materials to promote awareness of inclusive programming across all grades. Outreach materials also include informative videos about Sac High and instructional videos on how to apply. The admissions team is available to assist individuals with diverse disabilities to apply in person, over the phone, or in another manner as needed. In addition, informational sessions are hosted virtually and on campus in ADA accessible spaces. Sac High works with community organizations that support families with children with disabilities as well as working with other schools to best assist the family and student. Sac High collaborates closely with PS7 to ensure students with disabilities have a smooth transition between schools for students matriculating from PS7's 8th grade to Sac High's 9th grade.

SHPS also works closely with community organizations that support families that may speak a language other than English such as La Familia Counseling Center. Recruitment efforts also include participating in community events that target predominantly Latino communities such as La Posada, Día de los Muertos events, and Día del Niño. In addition, SHPS participates in the annual International Kids Festival, which caters to diverse ethnic communities.

Sac High has divided the admissions process into two steps to allow all families the opportunity to enroll.



The first step consists of a public random drawing (“lottery”) application. An example of the lottery application is located in Appendix 8 and will be made available in other languages as needed. This admissions lottery application is available online and in paper form as needed. The lottery application requires no supporting documentation, thus allowing any interested student or family to fill one out wherever they may be, such as at an enrollment fair, a community event or any other activity where SHPS may be recruiting students. Completing this form during the open enrollment period ensures a student will have a place in the lottery based on the admissions preferences, which are located on the application, in the enrollment policy, and listed in Element 8 of this Petition.

Once students are admitted, through a random public drawing if needed, families complete the second step of the admissions process by completing an enrollment packet and submitting all required documentation. A checklist of required documentation is also provided to families.

As a high school serving grades 9–12, Sac High focuses the majority of its recruitment on rising 9th graders. In order to recruit the next year's freshman class, Sac High conducts outreach to various programs serving middle school aged youth, primarily focusing its efforts on PS7, District middle schools and other public school programs serving 8th grade students in the Sacramento area. Admissions representatives visit local middle schools to hand out information, expose students to high school options, and talk to prospective students about Sac High. Admissions representatives also communicate with school and community leaders (i.e., parent organizations) to provide admissions materials, updated information, and to ensure a smooth admissions process between middle school and high school for families. Where feasible, all participating District middle schools are provided with informational flyers for every eighth grader to inform them of upcoming admissions information sessions and pending application deadlines, along with any other recruitment events.

Sac High holds informational sessions throughout the recruitment season in order to provide information to families regarding the program and offerings.

In addition, outreach efforts strive to provide every household with a middle school or high school aged child in the Oak Park neighborhood and surrounding communities with recruitment materials, provided it is economically feasible. Recruitment materials will be published in English, Spanish and other languages as needed to communicate the mission and educational program of Sac High. Publishing all materials in Spanish has greatly increased accessibility to the Hispanic population residing in Sacramento, including those households where Spanish is the first language. A sample of recruitment materials in multiple languages is provided in Appendix 7. In addition, and as needed, marketing materials may be delivered to businesses, community centers and other public locations in the targeted community, and presentations and flier distribution will be conducted at community meetings and events, also in multiple languages if needed.

Recruitment materials also emphasize all students are welcome at Sac High, including those with disabilities. While students are not required to submit an IEP prior to enrollment, they are strongly encouraged to do so in order for the Special Education team and Sac High to have the most time possible to set up support services and ensure the student is successful upon enrollment.

The Charter School also recruits through advertising in the media via websites, social media and other methods by which potential students and families can be contacted. As feasible and where necessary, the Charter School will also place billboards in the surrounding neighborhoods and advertisements on public transportation routes serving the area around Sac High to advertise the program along with any admissions events or deadlines. Examples of specific student recruitment efforts and organizations SHPS will reach out to for recruitment purposes include but are not limited to the list below.

Sample of Recruitment Efforts	
Location	Efforts
Targeted Mailings	Postcards sent to families residing in Oak Park and the neighboring south Sacramento communities on mailing lists with children ages 12 to 17.
Targeted Outreach to Families who speak a language other than English in the home	Fliers in multiple languages, flier distribution and presentations at cultural centers (e.g.: La Familia). Media outlets tailored to the EL community (e.g., Sacramento Hmong Journal, APA news and Review, Telemundo)
Program Locations (e.g., Boys and Girls Club, Salvation Army, Community Centers, Sacramento Food Bank)	Information session and flier distribution
<p>Community Resources (including but not limited to the list below):</p> <ul style="list-style-type: none"> • Oak Park Neighborhood Association • Oak Park Business Association • Oak Park Community Center • Stockton Blvd. community groups • Broadway community groups • Fruitridge Rd. community groups • Stockton Blvd. community groups • Franklin Blvd. community groups • Oak Park Farmer's Market • Latino Coalition for a Healthy California • Sacramento Hispanic Chamber of Commerce • Sacramento Asian-Pacific Chamber of Commerce • Next Move • La Familia Counseling Center • Salvation Army • Food Bank and Family Services • Wellspring Women's Center • Fruitridge Community Collaborative 	Information session (if feasible), flier distribution

<ul style="list-style-type: none"> • Valley Hi Community Center • Mack Road Partnership • Sojourner Truth Museum • Roberts Family Development Center • Southgate Recreation and Park District • Women's Civic Improvement Club (WCIC) • Colonial Heights Library • City of Refuge • Pacific Housing, Inc. • Latino Center of Art Culture • Juneteenth Festivals • MLK365 	Information session (if feasible), flier distribution
Sacramento HUD Housing Corporation	Information session, flier distribution
Faith-based organizations	Information session, flier distribution
PS7 Elementary and Middle School campuses	Information session for students and families, shadow days for students
SHPS Events	Information session, flier distribution, Family Nights, activities for middle school students
Sacramento Local Events (e.g., State Fair)	Information session, flier distribution
Libraries, stores and other local businesses	Information session, flier distribution
Program Locations (e.g., Boys and Girls Club)	Information session, flier distribution
Community Resources (e.g., Oak Park Community Groups)	Flier distribution

Supermarkets and Shopping Centers	Flier distribution
Sacramento Community and Recreation Centers	Information session, flier distribution
Advertisements	Advertisements in newspapers, radio, billboards, bus tails and other media
Press Releases	Press releases to newspapers, radio, and television stations

ACCESSIBILITY

Attracting and maintaining a diverse student body does not depend solely on outreach efforts, but also on accessibility. Sac High has taken strides to ensure that enrollment in the Charter School is available to all who are interested.

Families are encouraged to tour the Charter School, as schedules permit. Additionally, Sac High hosts orientations prior to the school year starting for all students. Orientations provide students with a clear outline of the Charter School's goals, expectations and structures, and ensure students are clear on how to succeed at Sac High from the first day of school through graduation. Parents are encouraged to attend these sessions with their child to ensure a smooth transition and clear expectations for all.





ELEMENT 8

ADMISSION POLICIES AND PROCEDURES



ELEMENT 8: ADMISSION POLICIES AND PROCEDURES

Admission policies and procedures, consistent with [Education Code Section 47605] subdivision (e). Education Code Section 47605(c)(5)(H).

ASSURANCES

The Charter School will admit all pupils who wish to attend the Charter School as outlined in Education Code Section 47605(e)(2)(A).

As a non-sectarian, tuition-free public school, the Charter School will admit all grade-level eligible pupils residing in California who wish to attend up to the Charter School's capacity, within the minimum and maximum age requirements specified in applicable law, and in accordance with Education Code Section 47605(e)(2)(A). The Charter School is a school of choice, and in compliance with Education Code Section 47605(g), no student will be required to attend the Charter School.

Admission eligibility will not be determined by the place of residence of a pupil, except as otherwise required in the case of a public random drawing. If the number of students who wish to attend the Charter School exceeds the Charter School's capacity, admission to the Charter School, except for existing students, shall be determined by public random drawing in accordance with the procedures and admission preferences specified below.

There shall be no admission testing or other evaluation required of any applicant. The Charter School shall not charge an application fee. The Charter School will not require any monetary or other contribution as a condition for application, admission, enrollment, or participation in any of the Charter School's required educational activities. In accordance with Education Code Sections 49011 and 47605(e)(2)(B)(iv), admission preferences shall not require mandatory parental volunteer hours as a criterion for admission or continued enrollment.

The Charter School shall be nonsectarian in its admission and enrollment policies and shall not admit, nor deny admission to students on the basis of the characteristics listed in Education Code Section 220 (actual or perceived disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained in the definition of hate crimes set forth in Section 422.55 of the Penal Code, including immigration status, or association with an individual who has any of the aforementioned characteristics).

In accordance with Education Code Section 47605(e)(4)(A), the Charter School shall not discourage a pupil from enrolling or seeking to enroll in the Charter School for any reason, including, but not limited to, academic performance of the pupil or because the pupil exhibits any of the characteristics described in Education Code Section 47605(e)(2)(B)(iii), including pupils with disabilities, academically low-achieving pupils, English Learners, neglected or delinquent pupils, homeless pupils, or pupils who are economically disadvantaged, as determined by eligibility for any free or reduced-price meal program, foster youth, or pupils based on nationality, race, ethnicity, or sexual orientation. Similarly, in accordance with Section 47605(e)(4)(C), the Charter School shall not encourage a pupil currently attending the Charter School to disenroll from the Charter School or transfer to another school for any reason, including, but not limited to the academic performance of the pupil or because the pupil exhibits any of the characteristics described in Education Code Section 47605(e)(2)(B)(iii), as listed above.

Pursuant to Education Code Section 47605(e)(4)(D), the Charter School shall post a notice developed by the CDE on the Charter School website, outlining the requirements of Section 47605(e)(4), and make this notice available to parents.

NON-DISCRIMINATION

The Charter School shall not require a parent/legal guardian/student to provide information regarding a student's disability, gender, gender identity, gender expression, nationality, legal or economic status, primary language or English Learner status, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained in the definition of hate crimes set forth in section 422.55 of the Penal Code, or any other information that would violate federal or state law, prior to admission, participation in any admissions or attendance lottery, or pre-enrollment event or process, or as a condition of admission or enrollment.

The Charter School may request, at the time of, and as part of, conducting its lottery process, the provision of information necessary to apply specific admission preferences set forth in this Petition.

The Charter School shall not request or require submission of a student's IEP, 504 Plan, or any other record or related information prior to admission, participation in any admissions or attendance lottery, or pre-enrollment event or process, or as a condition of admission or enrollment.

HOMELESS AND FOSTER YOUTH

The Charter School shall adhere to the provisions of the McKinney-Vento Homeless Assistance Act and ensure that each child of a homeless individual and each homeless youth has equal access to the same free, appropriate public education as provided to other children and youths. The Charter School shall provide specific information, via its outreach materials, websites, at community meetings, open forums, and regional center meetings, which notifies parents the Charter School is open to enroll and provides services for all students, and provide a standard contact number for access to additional information regarding enrollment. The Charter School shall comply with all applicable provisions of Education Code Sections 48850 – 48859.

REQUIRED DOCUMENTATION FOR ENROLLMENT

The Charter School shall require students who wish to attend the Charter School to complete an application form. After admission, students will be required to submit an enrollment packet, which shall include the following:

1. Student enrollment form
2. Proof of required immunizations for high school students
3. Home Language Survey
4. Completion of Emergency Medical Information Form
5. Proof of minimum age requirements
6. Release of records³

A copy of the current Sac High enrollment policy can be found in Appendix 8. The enrollment policy will also identify how long families have to submit their enrollment packet and required documents once they have been notified of admission to Sac High. Charter School staff will assist all families with completing the above requirements. The Charter School will make every effort to ensure the enrollment process does not discourage or prevent any interested student from enrolling at the Charter School.

PUBLIC RANDOM DRAWING

Should the number of students who wish to attend Sac High exceed the Charter School's capacity, a public random drawing ("lottery") will take place to determine admission to the Charter School, per Education Code Section 47605(e)(2)(B). Preference will be given to students as listed in below. Existing students will be exempt from the lottery and will be guaranteed admission for the following year.

³ Sac High shall not request a pupil's records or require a parent, guardian, or pupil to submit the pupil's records to Sac High before enrollment.

The lottery, if needed, will be held at the Charter School or at a location suitable for conducting such an event that is accessible to the public. All students will be drawn in the lottery if demand exceeds capacity, and a waiting list will be created once capacity is reached. All lottery procedures and waiting list priorities will be available at the Charter School to ensure all interested parties are informed of procedures. Sac High will keep a file documenting the fair execution of lottery procedures. Sac High currently utilizes a computer generated lottery system.

Following the lottery all students drawn for admission will receive a family notification via the contact information provided on the open enrollment application. In cases where there is not a lottery, all applicants will be notified of admission following the conclusion of the open enrollment period. Once they have been notified of admission to Sac High, families submit their enrollment packets and required documents. The Charter School will contact the parents/guardians of students if they are admitted to Sac High from the waiting list.

LOTTERY PROCESS COMMUNICATION

The Charter School will designate an open enrollment period, and only applications received during this timeframe will be considered for the lottery. The conclusion of the open enrollment timeline period will generally align with or be more expansive than the District's open enrollment window. The Charter School's exact open enrollment dates will be published annually. Notice will be posted in a public location regarding the date and time of the lottery once the open enrollment deadline has passed and this information will also be communicated to all applicants. The lottery will be conducted at a time at which a maximum number of families and interested parties can attend, however attendance is not required. On the application, parents/guardians have the opportunity to indicate any admission preference that applies to their child as indicated below, such as being a sibling of a current or admitted Sac High student or residing within SCUSD boundaries.

FAIR LOTTERY PROCEDURES

Sac High will use a neutral proctor and/or a computer generated lottery system to ensure the lottery procedures are fairly executed. Families are not required to attend the lottery to be accepted.

The SHPS Board of Directors will take all necessary efforts to ensure lottery procedures are fairly executed. Lottery spaces are pulled in order of grade level by the designated lottery official (appointed by the Superintendent or their designee). Separate lotteries shall be conducted for each grade in which there are fewer vacancies than pupils interested in attending.

All lotteries shall take place on the same day in a single location. Lotteries will be conducted in ascending order beginning with the lowest applicable grade level. There is no weighted priority assigned to the preference categories; rather, within each grade level, students will be drawn from pools beginning with all applicants who qualify for the first preference category, and shall continue with that preference category until all vacancies within that grade level have been filled. If there are more students in a preference category than there are spaces available, a random drawing will be held from within that preference category until all available spaces are filled. If all students from the preference category have been selected and there are remaining spaces available in that grade level, students from the second preference category will be drawn in the lottery, and the drawing shall continue until all spaces are filled and preference categories are exhausted in the order provided below. All applicants will be drawn in the lottery and those drawn after all spaces are full will be placed on the waitlist in the order the names were drawn.

ADMISSION PREFERENCES

Students who currently attend Sac High in grades 9–11 are automatically granted admission for the next school year, and are exempt from any lottery. Additionally, students who are currently attending the Charter School and are retained in the same grade level are also exempt from the lottery. Admissions preference for new students is granted in the following order:

1. Siblings (defined as sharing at least one biological, foster, or adoptive parent) of students admitted to or attending Sac High. In addition, on an annual basis Sac High may determine to include a preference for siblings of students who, at the time of the random drawing, are attending or admitted to PS7.
2. Children of St. HOPE Public Schools employees and children of members of the Board (this preference is limited to 10% of the total school enrollment).
3. Students placed on the waiting list the previous year who were not admitted.
4. Students who are enrolled at PS7 at the time of seeking admission to SCHS (applies to incoming 9th graders only).
5. Students who reside within the boundaries of the Sacramento City Unified School District ("in-District students").
6. All other students residing within the State of California.

A copy of the current Sac High Enrollment Policy can be found in Appendix 8 along with an application. All documents are provided in English and Spanish and can be provided in additional languages as needed.

WAITING LIST

A waiting list will be developed from the new applications that do not receive admission each year and students on the waiting list are considered in the order they were drawn and placed on the waiting list, should a vacancy occur during the year. Sac High will contact the parents/guardians of students who have been offered a spot off the waiting list and inform parents/guardians of the timeline by which they must respond.





ELEMENT 9

ANNUAL INDEPENDENT FINANCIAL AUDIT



ELEMENT 9: ANNUAL INDEPENDENT FINANCIAL AUDIT

Governing Law: The manner in which annual, independent, financial audits shall be conducted, which shall employ generally accepted accounting principles, and the manner in which audit exceptions and deficiencies shall be resolved to the satisfaction of the chartering authority. Education Code Section 47605(c)(5)(l).

INDEPENDENT CHARTER STATUS

Sacramento Charter High School is a fiscally independent, directly funded charter school that is operated by St. HOPE Public Schools.

Each fiscal year, a California certified independent auditor verifies the accuracy of the financial statements, attendance, and enrollment accounting practices, and internal controls. A list of recommended audit firms from the District may be used by the SHPS Board of Directors in selecting an auditor. The Board may select the auditor through a request for proposal. An auditor is chosen based on experience with charter school finance, auditing experience, approved by the State Controller on its published list as an educational audit provider and cost. The Board selecting the auditor does not have a direct, financial stake in matters audited.

Sac High and SHPS have and will continue to develop and implement controls necessary to gather and prepare information for all jurisdictional and financial reporting requirements.

FINANCIAL AUDITS

An annual independent financial audit of the books and records of the Charter School, will be conducted as required by Education Code Sections 47605(c)(5)(l) and 47605(m). The books and records of the Charter School will be kept in accordance with generally accepted accounting principles, and as required by applicable law, and the audit will employ generally accepted accounting procedures. The audit shall be conducted in accordance with applicable provisions within the California Code of Regulations governing audits of charter schools as published in the State Controller's K-12 Audit Guide. That audit will cover each of SHPS' schools. Because St. HOPE Public Schools is one legal entity, only one set of audited financial statements will be produced for SHPS, but those financial statements will include supplementary information showing school-by-school results.

The Board, in conjunction with SHPS staff, is responsible for contracting with an independent auditor. SHPS staff is responsible for overseeing the independent audit. The auditor will have, at a minimum, a CPA and educational institution audit experience and will be approved by the State Controller on its published list as an educational audit provider. To the extent required under applicable federal law, the audit scope will be expanded to include items and processes specified in applicable Office of Management and Budget Circulars.

SHPS shall transmit a copy of its annual independent financial audit report for the preceding fiscal year to the District, the County Superintendent of Schools, the State Controller, and the CDE by the required deadline each year. Audit exceptions and deficiencies, if any, will be resolved in conference with the auditor. SHPS will resolve any audit exceptions and deficiencies, if they so arise, to the satisfaction of the District. Audit appeals or requests for summary review shall be submitted to the Education Audit Appeals Panel ("EAAP") in accordance with applicable law.

The independent fiscal audit of Sac High is a public record to be provided to the public upon request.

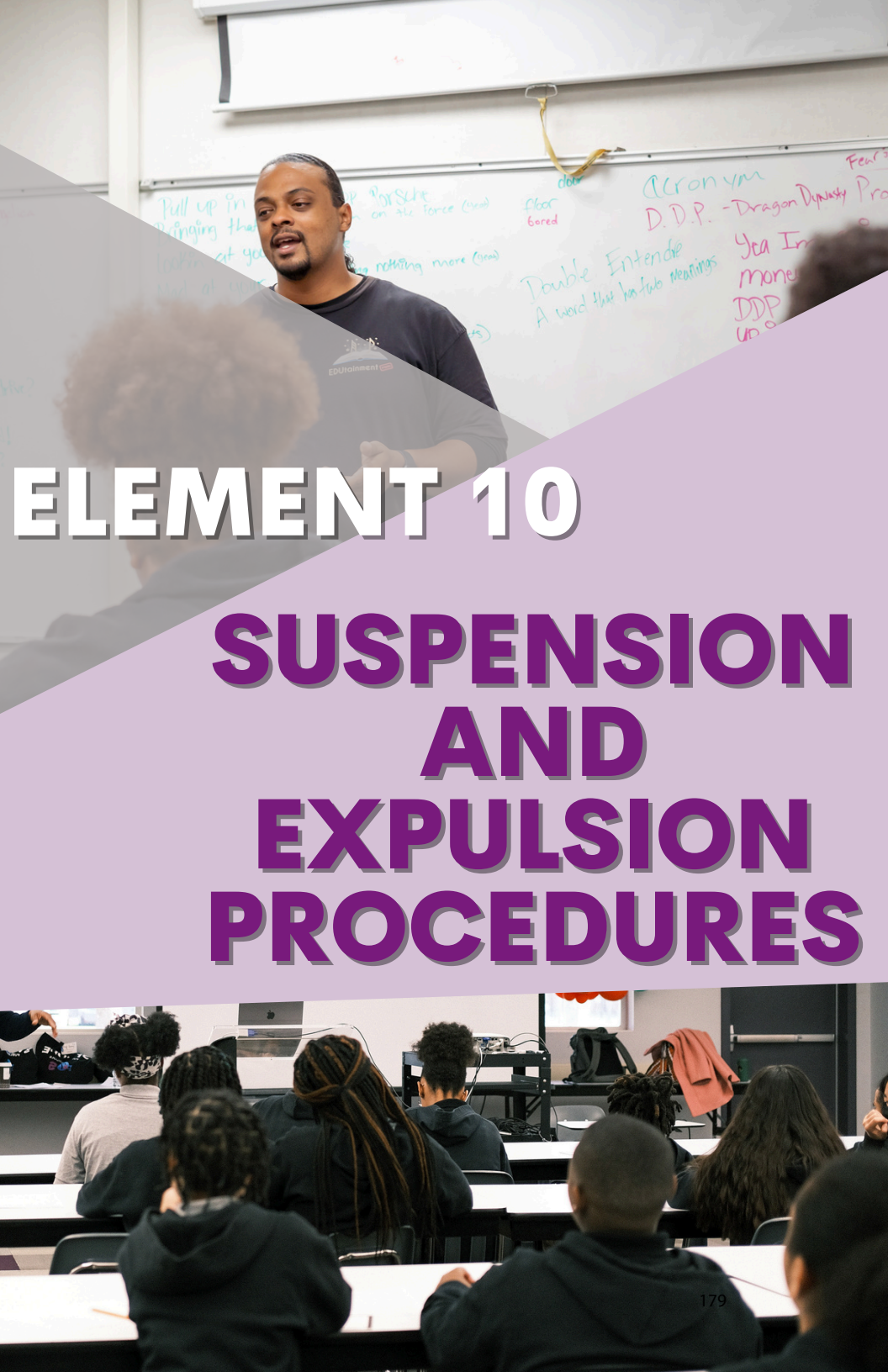
REPORTING REQUIREMENTS

Sac High will promptly respond to all reasonable inquiries from the District, including but not limited to, inquiries regarding financial records, and will consult with the District regarding any inquiries.

SUPPORTING DOCUMENTS

Additional documents have been included in Appendix 9 to provide further information regarding the past financial performance of Sac High and SHPS. These documents include:

- SHPS Audits for the following fiscal years:
 - 2019-20
 - 2020-21
 - 2021-22
 - 2022-23
- Declaration of Insurance for SHPS



ELEMENT 10

SUSPENSION AND EXPULSION PROCEDURES



ELEMENT 10: SUSPENSION AND EXPULSION PROCEDURES

The procedures by which pupils can be suspended or expelled from the charter school for disciplinary reasons or otherwise involuntarily removed from the charter school for any reason. These procedures, at a minimum, shall include an explanation of how the charter school will comply with federal and state constitutional procedural and substantive due process requirements that is consistent with all of the following:

- *(i) For suspensions of fewer than 10 days, provide oral or written notice of the charges against the pupil and, if the pupil denies the charges, an explanation of the evidence that supports the charges and an opportunity for the pupil to present the pupil's side of the story.*
- *(ii) For suspensions of 10 days or more and all other expulsions for disciplinary reasons, both of the following:*
 - *(I) Provide timely, written notice of the charges against the pupil and an explanation of the pupil's basic rights.*
 - *(II) Provide a hearing adjudicated by a neutral officer within a reasonable number of days at which the pupil has a fair opportunity to present testimony, evidence, and witnesses and confront and cross-examine adverse witnesses, and at which the pupil has the right to bring legal counsel or an advocate.*
- *(iii) Contain a clear statement that no pupil shall be involuntarily removed by the charter school for any reason unless the parent or guardian of the pupil has been provided written notice of intent to remove the pupil no less than five school days before the effective date of the action. The written notice shall be in the native language of the pupil or the pupil's parent or guardian or, if the pupil is a homeless child or youth, or a foster child or youth, in the native language of the homeless or foster child's educational rights holder. In the case of a foster child or youth, the written notice shall also be provided to the foster child's attorney and county social worker. If the pupil is an Indian child, as defined in Section 224.1 of the Welfare and Institutions Code, the written notice shall also be provided to the Indian child's tribal social worker and, if applicable, county social worker. The written notice shall inform the pupil, the pupil's parent or guardian, the homeless child's educational rights holder, the foster child's educational rights holder, attorney, and county social worker, or the Indian child's tribal social worker and, if applicable, county social worker of the right to initiate the procedures specified in clause (ii) before the effective date of the action. If the pupil's parent or guardian, the homeless child's educational rights holder, the foster child's educational rights holder, attorney, or county social worker, or the Indian child's tribal social worker or, if applicable, county social worker initiates the procedures specified in clause (ii), the pupil shall remain enrolled and shall not be removed until the charter school issues a final decision. For purposes of this clause, "involuntarily removed" includes disenrolled, dismissed, transferred, or terminated, but does not include suspensions specified in clauses (i) and (ii).*

- *(iv) A foster child's educational rights holder, attorney, and county social worker and an Indian child's tribal social worker and, if applicable, county social worker shall have the same rights a parent or guardian of a child has to receive a suspension notice, expulsion notice, manifestation determination notice, involuntary transfer notice, and other documents and related information.*

Education Code Section 47605(c)(5)(J)

SHPS has high standards for academic achievement and student conduct that are clearly defined, quantitatively measurable, and do not allow for excuses based on the background of students. All adults and students on the SCHS campus share the responsibility for creating and preserving a school environment that is safe, orderly, and exemplifies SHPS' five pillars. Students are expected to be responsible for their own behavior where appropriate clear and consistent consequences are strictly applied and enforced. This includes disciplinary action up to and including suspension and expulsion. The purposes of discipline at SCHS are as follows:

- Promote genuine pupil development;
- Increase respect for authority;
- Assist in the growth of self-discipline; and
- Provide an orderly atmosphere conducive to learning and to promote character training.

Students who do not embrace these principles and who through their actions violate SCHS' code of conduct will be subject to disciplinary measures.

Following the approval of an expulsion recommendation by the SHPS Board of Directors for an in-District student, all expulsion documents for the student, along with the student's cumulative file, will be forwarded to the District Director of Student Hearing and Placement.

In addition, SCHS's focus is on educating students and the Charter School understands students do not arrive perfect and they will make mistakes. Most often mistakes should be seen as learning opportunities, whether they are made with a math problem or in regard to behavior. As such, it is SCHS' desire to avoid suspension or expulsion whenever possible. If student behavior can be corrected through means other than removal from the classroom or school setting, whether temporary or permanent, then those steps will be attempted.

Expulsion is the harshest consequence that can be assigned to a student and SCHS, along with the SHPS board of directors, takes that responsibility seriously. As such, it is only for the most egregious offenses that a student will be considered for expulsion. While there are a few mandatory offenses that require staff to recommend a student for expulsion, as listed below, almost every other act can be addressed with means other than permanent removal from campus. In fact, SHPS can only extend a student's suspension pending an expulsion hearing when staff determines that a student poses a danger on campus, or will be a disruption to the learning environment. This high threshold is rarely crossed by students or used by staff, and is only applied after a major offense, or repeated high level offenses, that create an unsafe or disruptive environment.

While there is no clear set of offenses that qualify a student for expulsion, other than the short list of offenses that require a recommendation for expulsion, the low number of students receiving this consequence point to the policy and processes behind it, ensuring that only the highest level offenses receive this consequence. Ultimately, the Charter School determines whether a student should be suspended or expelled on a case-by-case basis, primarily based on the severity and/or frequency of the student's actions that give rise to potential suspension or expulsion.

SUSPENSION AND EXPULSION POLICY AND PROCEDURE

The Suspension and Expulsion Policy and Procedures have been established in order to promote learning and protect the safety and wellbeing of all students at the Charter School. In creating this policy, the Charter School has reviewed Education Code Section 48900 et seq. which describe the offenses for which students at non-charter schools may be suspended or expelled and the procedures governing those suspensions and expulsions in order to establish its list of offenses and procedures for suspensions, expulsions and involuntary removal. The language that follows is largely consistent with the language of Education Code Section 48900 et seq. The Charter School is committed to an annual review of policies and procedures surrounding suspensions, expulsions, and involuntary removals, and, as necessary, modification of the lists of offenses subject to suspension, expulsion, or involuntary removal. Consistent with this policy, it may be necessary to suspend or expel a student from regular classroom instruction. This shall serve as the Charter School's current policy and procedures for student suspension, expulsion, and involuntary removal, and it may be amended from time to time without the need to seek a material revision of the Petition so long as the amendments for specific offenses comport with legal requirements. Charter School staff shall enforce disciplinary policies and procedures fairly and consistently among all students. This policy and its procedures will be distributed annually as part of the student-parent handbook, available in Appendix 1, which will clearly describe expectations.

Corporal punishment shall not be used as a disciplinary measure against any student. Corporal punishment includes the willful infliction of or willfully causing the infliction of physical pain on a student. For purposes of this policy, corporal punishment does not include an employee's use of force that is reasonable and necessary to protect the employee, students, staff or other persons or to prevent damage to school property.

Charter School administration ensures students and their parents/guardians are notified in writing upon enrollment of all discipline and involuntary removal policies and procedures. The notice states this policy and its procedures are available upon request at the Charter School's office and on the Charter School's website.

Suspended or expelled students shall be excluded from all school and school-related activities unless otherwise agreed during the period of suspension or expulsion.

A student identified as an individual with disabilities or for whom the Charter School has a basis of knowledge of a suspected disability pursuant to the IDEA or who is qualified for services under Section 504 is subject to the same grounds for suspension and expulsion and is accorded the same due process procedures applicable to general education students except when federal and state law requires additional or different procedures. The Charter School follows all applicable federal and state laws including but not limited to the applicable provisions of the Education Code, when imposing any form of discipline on a student identified as an individual with disabilities, for whom the Charter School has a basis of knowledge of a suspected disability, or who is otherwise qualified for such services or protections in according due process to such students.

No student shall be involuntarily removed by the Charter School for any reason unless the parent/guardian of the student has been provided written notice of intent to remove the student no less than five (5) school days before the effective date of the action. The written notice shall be in the native language of the student or the student's parent/guardian and shall inform the student, and the student's parent/guardian of the basis for which the student is being involuntarily removed, and the student's parent/guardian's right to request a hearing to challenge the involuntary removal. If a student's parent/guardian requests a hearing, the Charter School shall utilize the same hearing procedures specified below for expulsions before the effective date of the action to involuntarily remove the student. If the student's parent/guardian requests a hearing, the student shall remain enrolled and shall not be removed until the Charter School issues a final decision. As used herein, "involuntarily removed" includes disenrolled, dismissed, transferred, or terminated, but does not include removals for misconduct which may be grounds for suspension or expulsion as enumerated below.

*The Charter School shall ensure that a homeless child or youth's educational rights holder; a foster child or youth's educational rights holder, attorney, and county social worker; and an Indian child's tribal social worker and, if applicable, county social worker have the same rights as a parent or guardian to receive a suspension notice, expulsion notice, manifestation determination notice, involuntary transfer notice, involuntary removal notice, and other documents and related information. For purposes of this policy and its procedures, the term "parent/guardian" shall include these parties.

A. Grounds for Suspension and Expulsion of Students

A student may be suspended or expelled for prohibited misconduct if the act is related to school activity or school attendance occurring at any time including but not limited to: a) while on school grounds; b) while going to or coming from school; c) during the lunch period, whether on or off the school campus; or d) during, going to, or coming from a school-sponsored activity.

B. Enumerated Offenses

1. Discretionary Suspendable Offenses. Students may be suspended when it is determined the student:

- a) Caused, attempted to cause, or threatened to cause physical injury to another person.
- b) Willfully used force or violence upon the person of another, except self-defense.
- c) Unlawfully possessed, used, or otherwise furnished, or was under the influence of any controlled substance, as defined in Health and Safety Code Sections 11053-11058, alcoholic beverage, or intoxicant of any kind.
- d) Unlawfully offered, arranged, or negotiated to sell any controlled substance as defined in Health and Safety Code Sections 11053-11058, alcoholic beverage or intoxicant of any kind, and then sold, delivered or otherwise furnished to any person another liquid substance or material and represented same as controlled substance, alcoholic beverage or intoxicant.
- e) Committed or attempted to commit robbery or extortion.
- f) Caused or attempted to cause damage to school property or private property, which includes but is not limited to, electronic files and databases.
- g) Stole or attempted to steal school property or private property, which includes but is not limited to, electronic files and databases.
- h) Possessed or used tobacco or products containing tobacco or nicotine products, including but not limited to cigars, cigarettes, miniature cigars, clove cigarettes, smokeless tobacco, snuff, chew packets and betel. This section does not prohibit the use of a student's own prescription products by a student.
- i) Committed an obscene act or engaged in habitual profanity or vulgarity.

- j) Unlawfully possessed or unlawfully offered, arranged, or negotiated to sell any drug paraphernalia, as defined in Health and Safety Code Section 11014.5.
- k) Disrupted school activities or otherwise willfully defied the valid authority of supervisors, teachers, administrators, other school officials, or other school personnel engaged in the performance of their duties.
- l) Knowingly received stolen school property or private property, which includes but is not limited to, electronic files and databases.
- m) Possessed an imitation firearm, i.e.: a replica of a firearm that is so substantially similar in physical properties to an existing firearm as to lead a reasonable person to conclude that the replica is a firearm.
- n) Harassed, threatened, or intimidated a student who is a complaining witness or witness in a school disciplinary proceeding for the purpose of preventing that student from being a witness and/or retaliating against that student for being a witness.
- o) Unlawfully offered, arranged to sell, negotiated to sell, or sold the prescription drug Soma.
- p) Engaged in, or attempted to engage in hazing. For the purposes of this policy, "hazing" means a method of initiation or preinitiation into a student organization or body, whether or not the organization or body is officially recognized by an educational institution, which is likely to cause serious bodily injury or personal degradation or disgrace resulting in physical or mental harm to a former, current, or prospective student. For purposes of this policy, "hazing" does not include athletic events or school-sanctioned events.
- q) Made terroristic threats against school officials and/or school property, which includes but is not limited to, electronic files and databases. For purposes of this policy, "terroristic threat" shall include any statement, whether written or oral, by a person who willfully threatens to commit a crime which will result in death, great bodily injury to another person, or property damage in excess of one thousand dollars (\$1,000), with the specific intent that the statement is to be taken as a threat, even if there is no intent of actually carrying it out, which, on its face and under the circumstances in which it is made, is so unequivocal, unconditional, immediate, and specific as to convey to the person threatened, a gravity of purpose and an immediate prospect of execution of the threat, and thereby causes that person reasonably to be in sustained fear for their own safety or for their immediate family's safety, or for the protection of school property, which includes but is not limited to, electronic files and databases, or the personal property of the person threatened or their immediate family.

r) Committed sexual harassment, as defined in Education Code Section 212.5. For the purposes of this policy, the conduct described in Section 212.5 must be considered by a reasonable person of the same gender as the victim to be sufficiently severe or pervasive to have a negative impact upon the individual's academic performance or to create an intimidating, hostile, or offensive educational environment. This provision shall apply to students in any of grades 4 to 12, inclusive.

s) Caused, attempted to cause, threatened to cause or participated in an act of hate violence, as defined in Education Code Section 233(e).

- Intentionally harassed, threatened or intimidated school personnel or volunteers and/or a student or group of students to the extent of having the actual and reasonably expected effect of materially disrupting class work, creating substantial disorder and invading the rights of either school personnel or volunteers and/or student(s) by creating an intimidating or hostile educational environment

t) Engaged in an act of bullying, including, but not limited to, bullying committed by means of an electronic act.

1. "Bullying" means any severe or pervasive physical or verbal act or conduct, including communications made in writing or by means of an electronic act, and including one or more acts committed by a student or group of students which would be deemed hate violence or harassment, threats, or intimidation, which are directed toward one or more students that has or can be reasonably predicted to have the effect of one or more of the following:

- i. Placing a reasonable student (defined as a student, including, but is not limited to, a student with exceptional needs, who exercises average care, skill, and judgment in conduct for a person of their age, or for a person of their age with exceptional needs) or students in fear of harm to that student's or those students' person or property.
- ii. Causing a reasonable student to experience a substantially detrimental effect on their physical or mental health.
- iii. Causing a reasonable student to experience substantial interference with their academic performance.
- iv. Causing a reasonable student to experience substantial interference with their ability to participate in or benefit from the services, activities, or privileges provided by the Charter School.

2. "Electronic Act" means the creation or transmission originated on or off the school site, by means of an electronic device, including, but not limited to, a telephone, wireless telephone, or other wireless communication device, computer, or pager, of a communication, including, but not limited to, any of the following:
 - i. A message, text, sound, video, or image.
 - ii. A post on a social network Internet Web site including, but not limited to:
 - a. Posting to or creating a burn page. A "burn page" means an Internet Web site created for the purpose of having one or more of the effects as listed in subparagraph (1) above.
 - b. Creating a credible impersonation of another actual student for the purpose of having one or more of the effects listed in subparagraph (1) above. "Credible impersonation" means to knowingly and without consent impersonate a student for the purpose of bullying the student and such that another student would reasonably believe, or has reasonably believed, that the student was or is the student who was impersonated.
 - c. Creating a false profile for the purpose of having one or more of the effects listed in subparagraph (1) above. "False profile" means a profile of a fictitious student or a profile using the likeness or attributes of an actual student other than the student who created the false profile.
 - iii. An act of cyber sexual bullying.
 - a. For purposes of this policy, "cyber sexual bullying" means the dissemination of, or the solicitation or incitement to disseminate, a photograph or other visual recording by a student to another student or to school personnel by means of an electronic act that has or can be reasonably predicted to have one or more of the effects described in subparagraphs (i) to (iv), inclusive, of paragraph (1). A photograph or other visual recording, as described above, shall include the depiction of a nude, semi-nude, or sexually explicit photograph or other visual recording of a minor where the minor is identifiable from the photograph, visual recording, or other electronic act.
 - b. For purposes of this policy, "cyber sexual bullying" does not include a depiction, portrayal, or image that has any serious literary, artistic, educational, political, or scientific value or that involves athletic events or school-sanctioned activities.
3. Notwithstanding subparagraphs (1) and (2) above, an electronic act shall not constitute pervasive conduct solely on the basis that it has been transmitted on the Internet or is currently posted on the Internet.

u) A student who aids or abets, as defined in Penal Code Section 31, the infliction or attempted infliction of physical injury to another person may be subject to suspension, but not expulsion, except that a student who has been adjudged by a juvenile court to have committed, as an aider and abettor, a crime of physical violence in which the victim suffered great bodily injury or serious bodily injury shall be subject to discipline pursuant to subdivision (1) (a)-(b).

v) Possessed, sold, or otherwise furnished any knife or other dangerous object of no reasonable use to the student unless, in the case of possession of any object of this type, the student had obtained written permission to possess the item from a certificated school employee, with the Superintendent or designee's concurrence.

2. Non-Discretionary Suspendable Offenses: Students must be suspended and recommended for expulsion when it is determined the student:

- a. Possessed, sold, or otherwise furnished any firearm, explosive, or other destructive device unless, in the case of possession of any device of this type, the student had obtained written permission to possess the item from a certificated school employee, with the Superintendent or designee's concurrence.
- b. Brandished a knife at another person.
- c. Unlawfully sold a controlled substance listed in Health and Safety Code Section 11053, et seq.
- d. Committed or attempted to commit a sexual assault as defined in Penal Code Sections 261, 266c, 286, 287, 288, or 289 or former Section 288a of the Penal Code, or committed a sexual battery as defined in Penal Code Section 243.4.

3. Discretionary Expellable Offenses: Students may be recommended for expulsion when it is determined the student:

- a) Caused, attempted to cause, or threatened to cause physical injury to another person.
- b) Willfully used force or violence upon the person of another, except self-defense.
- c) Unlawfully possessed, used, or otherwise furnished, or was under the influence of any controlled substance, as defined in Health and Safety Code Sections 11053-11058, alcoholic beverage, or intoxicant of any kind.
- d) Unlawfully offered, arranged, or negotiated to sell any controlled substance as defined in Health and Safety Code Sections 11053-11058, alcoholic beverage or intoxicant of any kind, and then sold, delivered or otherwise furnished to any person another liquid substance or material and represented same as controlled substance, alcoholic beverage or intoxicant.
- e) Committed or attempted to commit robbery or extortion.
- f) Caused or attempted to cause damage to school property or private property, which includes but is not limited to, electronic files and databases.
- g) Stole or attempted to steal school property or private property, which includes but is not limited to, electronic files and databases.
- h) Possessed or used tobacco or products containing tobacco or nicotine products, including but not limited to cigars, cigarettes, miniature cigars, clove cigarettes, smokeless tobacco, snuff, chew packets and betel. This section does not prohibit the use of a student's own prescription products by a student.
- i) Committed an obscene act or engaged in habitual profanity or vulgarity.

j) Unlawfully possessed or unlawfully offered, arranged, or negotiated to sell any drug paraphernalia, as defined in Health and Safety Code Section 11014.5.

k) Knowingly received stolen school property or private property, which includes but is not limited to, electronic files and databases.

l) Possessed an imitation firearm, i.e.: a replica of a firearm that is so substantially similar in physical properties to an existing firearm as to lead a reasonable person to conclude that the replica is a firearm.

m) Harassed, threatened, or intimidated a student who is a complaining witness or witness in a school disciplinary proceeding for the purpose of preventing that student from being a witness and/or retaliating against that student for being a witness.

n) Unlawfully offered, arranged to sell, negotiated to sell, or sold the prescription drug Soma.

o) Engaged in, or attempted to engage in hazing. For the purposes of this policy, "hazing" means a method of initiation or preinitiation into a student organization or body, whether or not the organization or body is officially recognized by an educational institution, which is likely to cause serious bodily injury or personal degradation or disgrace resulting in physical or mental harm to a former, current, or prospective student. For purposes of this policy, "hazing" does not include athletic events or school-sanctioned events.

p) Made terroristic threats against school officials and/or school property, which includes but is not limited to, electronic files and databases. For purposes of this policy, "terroristic threat" shall include any statement, whether written or oral, by a person who willfully threatens to commit a crime which will result in death, great bodily injury to another person, or property damage in excess of one thousand dollars (\$1,000), with the specific intent that the statement is to be taken as a threat, even if there is no intent of actually carrying it out, which, on its face and under the circumstances in which it is made, is so unequivocal, unconditional, immediate, and specific as to convey to the person threatened, a gravity of purpose and an immediate prospect of execution of the threat, and thereby causes that person reasonably to be in sustained fear for their own safety or for their immediate family's safety, or for the protection of school property, which includes but is not limited to, electronic files and databases, or the personal property of the person threatened or their immediate family.

q) Committed sexual harassment, as defined in Education Code Section 212.5. For the purposes of this policy, the conduct described in Section 212.5 must be considered by a reasonable person of the same gender as the victim to be sufficiently severe or pervasive to have a negative impact upon the individual's academic performance or to create an intimidating, hostile, or offensive educational environment.

r) Caused, attempted to cause, threatened to cause or participated in an act of hate violence, as defined in Education Code Section 233(e). This provision shall apply to students in any of grades 4 to 12, inclusive.

s) Intentionally harassed, threatened or intimidated school personnel or volunteers and/or a student or group of students to the extent of having the actual and reasonably expected effect of materially disrupting class work, creating substantial disorder and invading the rights of either school personnel or volunteers and/or student(s) by creating an intimidating or hostile educational environment. This provision shall apply to students in any of grades 4 to 12, inclusive.

t) Engaged in an act of bullying, including, but not limited to, bullying committed by means of an electronic act.

1. "Bullying" means any severe or pervasive physical or verbal act or conduct, including communications made in writing or by means of an electronic act, and including one or more acts committed by a student or group of students which would be deemed hate violence or harassment, threats, or intimidation, which are directed toward one or more students that has or can be reasonably predicted to have the effect of one or more of the following:

- i. Placing a reasonable student (defined as a student, including, but is not limited to, a student with exceptional needs, who exercises average care, skill, and judgment in conduct for a person of their age, or for a person of their age with exceptional needs) or students in fear of harm to that student's or those students' person or property.
- ii. Causing a reasonable student to experience a substantially detrimental effect on their physical or mental health.
- iii. Causing a reasonable student to experience substantial interference with their academic performance.
- iv. Causing a reasonable student to experience substantial interference with their ability to participate in or benefit from the services, activities, or privileges provided by the Charter School.

2. "Electronic Act" means the creation or transmission originated on or off the school site, by means of an electronic device, including, but not limited to, a telephone, wireless telephone, or other wireless communication device, computer, or pager, of a communication, including, but not limited to, any of the following:
- i. A message, text, sound, video, or image.
 - ii. A post on a social network Internet Web site including, but not limited to:
 - a. Posting to or creating a burn page. A "burn page" means an Internet Web site created for the purpose of having one or more of the effects as listed in subparagraph (1) above.
 - b. Creating a credible impersonation of another actual student for the purpose of having one or more of the effects listed in subparagraph (1) above. "Credible impersonation" means to knowingly and without consent impersonate a student for the purpose of bullying the student and such that another student would reasonably believe, or has reasonably believed, that the student was or is the student who was impersonated.
 - c. Creating a false profile for the purpose of having one or more of the effects listed in subparagraph (1) above. "False profile" means a profile of a fictitious student or a profile using the likeness or attributes of an actual student other than the student who created the false profile.
 - iii. An act of cyber sexual bullying.
 - a. For purposes of this policy, "cyber sexual bullying" means the dissemination of, or the solicitation or incitement to disseminate, a photograph or other visual recording by a student to another student or to school personnel by means of an electronic act that has or can be reasonably predicted to have one or more of the effects described in subparagraphs (i) to (iv), inclusive, of paragraph (1). A photograph or other visual recording, as described above, shall include the depiction of a nude, semi-nude, or sexually explicit photograph or other visual recording of a minor where the minor is identifiable from the photograph, visual recording, or other electronic act.
 - b. For purposes of this policy, "cyber sexual bullying" does not include a depiction, portrayal, or image that has any serious literary, artistic, educational, political, or scientific value or that involves athletic events or school-sanctioned activities.
3. Notwithstanding subparagraphs (1) and (2) above, an electronic act shall not constitute pervasive conduct solely on the basis that it has been transmitted on the Internet or is currently posted on the Internet.

u) A student who aids or abets, as defined in Penal Code Section 31, the infliction or attempted infliction of physical injury to another person may be subject to suspension, but not expulsion, except that a student who has been adjudged by a juvenile court to have committed, as an aider and abettor, a crime of physical violence in which the victim suffered great bodily injury or serious bodily injury shall be subject to discipline pursuant to subdivision (3)(a)-(b).

v) Possessed, sold, or otherwise furnished any knife or other dangerous object of no reasonable use to the student unless, in the case of possession of any object of this type, the student had obtained written permission to possess the item from a certificated school employee, with the Superintendent or designee's concurrence.

4. Non-Discretionary Expellable Offenses: Students must be recommended for expulsion when it is determined pursuant to the procedures below that the student:

- a. Possessed, sold, or otherwise furnished any firearm, explosive, or other destructive device unless, in the case of possession of any device of this type, the student had obtained written permission to possess the item from a certificated school employee, with the Superintendent or designee's concurrence.
- b. Brandished a knife at another person.
- c. Unlawfully sold a controlled substance listed in Health and Safety Code Section 11053, *et seq.*
- d. Committed or attempted to commit a sexual assault as defined in Penal Code Sections 261, 266c, 286, 287, 288, or 289 or former Section 288a of the Penal Code, or committed a sexual battery as defined in Penal Code Section 243.4.

If it is determined by the Administrative Panel and/or Board of Directors (for purposes of this Policy and Procedure, the Board of Directors may also mean its Executive Committee), that a student has brought a firearm or destructive device, as defined in Section 921 of Title 18 of the United States Code, on to campus or to have possessed a firearm or destructive device on campus, the student shall be expelled for one year, pursuant to the Federal Gun Free Schools Act of 1994. In such instances, the student shall be provided due process rights of notice and a hearing as required in this policy.

The Charter School will use the following definitions:

- The term "knife" means (A) any dirk, dagger, or other weapon with a fixed, sharpened blade fitted primarily for stabbing; (B) a weapon with a blade fitted primarily for stabbing; (C) a weapon with a blade longer than 3½ inches; (D) a folding knife with a blade that locks into place; or (E) a razor with an unguarded blade.
- The term "firearm" means (A) any weapon (including a starter gun) which will or is designed to or may readily be converted to expel a projectile by the action of an explosive; (B) the frame or receiver of any such weapon; (C) any firearm muffler or firearm silencer; or (D) any destructive device. Such term does not include an antique firearm.
- The term "destructive device" means any explosive, incendiary, or poison gas, including but not limited to: (A) bomb; (B) grenade; (C) rocket having a propellant charge of more than four ounces; (D) missile having an explosive or incendiary charge of more than one-quarter ounce; (E) mine; or (F) device similar to any of the devices described in the preceding clauses.

C. Suspension Procedure

Suspensions shall be initiated according to the following procedures:

1. Conference

Suspension shall be preceded, if possible, by a conference conducted by the appropriate administrator at the Charter School with the student and the student's parent/guardian and, whenever practical, the teacher, supervisor or Charter School employee who referred the student for the suspendable offense.

The conference may be omitted if it is determined that an emergency situation exists. An "emergency situation" involves a clear and present danger to the lives, safety or health of students or Charter School personnel. If a student is suspended without this conference, both the parent/guardian and the student shall be notified of the student's right to return to school for the purpose of a conference.

At the conference, the student shall be informed of the reason for the disciplinary action and the evidence against the student and shall be given the opportunity to present their version and evidence in their defense, in accordance with Education Code Section 47605(c)(5)(J)(i).

This conference shall be held within two (2) school days, unless the student waives this right or is physically unable to attend for any reason including, but not limited to, incarceration or hospitalization. The conference shall be held as soon as the student is physically able to return to school for the conference. Penalties shall not be imposed on a student for failure of the student's parent or guardian to attend a conference with Charter School officials. Reinstatement of the suspended student shall not be contingent upon attendance by the student's parent/guardian, at the conference.

2. Notice to Parents/Guardians

At the time of the suspension, an administrator or designee shall make a reasonable effort to contact the parent/guardian in person, by email, or by telephone. Whenever a student is suspended, the parent/guardian shall be notified in writing of the suspension and the date of return following suspension. This notice shall state the specific offense(s) committed by the student as well as the date the student may return to school following the suspension. If Charter School officials wish to ask the parent/guardian to confer regarding matters pertinent to the suspension, the notice may request that the parent/guardian respond to such requests without delay.

3. Suspension Time Limits/Recommendation for Expulsion

Suspensions, when not including a recommendation for expulsion, shall not exceed five (5) consecutive school days per suspension. Upon a recommendation of expulsion by the Superintendent or designee, the student and the student's parent/guardian shall be invited to a conference to determine if the suspension for the student should be extended pending an expulsion hearing. In such instances when the Charter School has determined a suspension period shall be extended, such extension shall be made only after a conference is held with the student and the student's parent/guardian, unless the student's parent/guardian fails to attend the conference. The determination will be made by the Superintendent or designee upon either of the following: 1) the pupil's presence will be disruptive to the education process; or 2) the pupil poses a threat or danger to others. Upon either determination, the pupil's suspension will be extended pending the results of an expulsion hearing.

4. Homework Assignments During Suspension

In accordance with Education Code Section 47606.2(a), upon the request of a parent, a legal guardian or other person holding the right to make education decisions for the student, or the affected student, a teacher shall provide to a student in any of grades 1 to 12, inclusive, who has been suspended from school for two (2) or more school days, the homework that the student would otherwise have been assigned.

In accordance with Education Code Section 47606.2(b), if a homework assignment that is requested pursuant to Section 47606.2(a) and turned into the teacher by the student either upon the student's return to school from suspension or within the timeframe originally prescribed by the teacher, whichever is later, is not graded before the end of the academic term, that assignment shall not be included in the calculation of the student's overall grade in the class.

D. Authority to Expel

As required by Education Code Section 47605(c)(5)(J)(ii), students recommended for expulsion are entitled to a hearing adjudicated by a neutral hearing officer to determine whether the student should be expelled. The procedures herein provide for such a hearing and the notice of said hearing, as required by law.

A student may be expelled either by the neutral and impartial SHPS Board of Directors following a hearing before it or by the SHPS Board of Directors upon the recommendation of a neutral and impartial Administrative Panel, to be assigned by the Superintendent or designee as needed. The Administrative Panel shall consist of at least three (3) members who are certificated and neither a teacher of the student nor a member of the SHPS Board of Directors. Each entity shall be presided over by a designated neutral hearing chairperson. The Administrative Panel may recommend expulsion of any student found to have committed an expellable offense, and the Board of Directors shall make the final determination.

E. Expulsion Procedures

Students recommended for expulsion are entitled to a hearing to determine whether the student should be expelled. Unless postponed for good cause, the hearing shall be held within thirty (30) school days after the Superintendent or designee determines that the student has committed an expellable offense and recommends the student for expulsion.

In the event an Administrative Panel hears the case, it will make a recommendation to the Board for a final decision whether to expel. The hearing shall be held in closed session (complying with all student confidentiality rules under FERPA) unless the student makes a written request for a public hearing in open session at least three (3) days prior to the date of the scheduled hearing.

Written notice of the hearing shall be forwarded to the student and the student's parent/guardian at least ten (10) calendar days before the date of the hearing. Upon mailing the notice, it shall be deemed served upon the student. The notice shall include:

1. The date and place of the expulsion hearing;
2. A statement of the specific facts, charges and offenses upon which the proposed expulsion is based;
3. A copy of the Charter School's disciplinary rules which relate to the alleged violation;
4. Notification of the student's or parent/guardian's obligation to provide information about the student's status at the Charter School to any other school district or school to which the student seeks enrollment;
5. The opportunity for the student and/or the student's parent/guardian to appear in person or to employ and be represented by counsel or a non-attorney advisor;
6. The right to inspect and obtain copies of all documents to be used at the hearing;
7. The opportunity to confront and question all witnesses who testify at the hearing;
8. The opportunity to question all evidence presented and to present oral and documentary evidence on the student's behalf including witnesses.

F. Special Procedures for Expulsion Hearings Involving Sexual Assault or Battery Offenses

The Charter School may, upon a finding of good cause, determine that the disclosure of either the identity of the witness or the testimony of that witness at the hearing, or both, would subject the witness to an unreasonable risk of psychological or physical harm. Upon this determination, the testimony of the witness may be presented at the hearing in the form of sworn declarations that shall be examined only by the Charter School or the hearing officer. Copies of these sworn declarations, edited to delete the name and identity of the witness, shall be made available to the student.

1. The complaining witness in any sexual assault or battery case must be provided with a copy of the applicable disciplinary rules and advised of their right to (a) receive five (5) days notice of their scheduled testimony; (b) have up to two (2) adult support persons of their choosing present in the hearing at the time the complaining witness testifies, which may include a parent/guardian, or legal counsel; and (c) elect to have the hearing closed while testifying.
2. The Charter School must also provide the victim a room separate from the hearing room for the complaining witness' use prior to and during breaks in testimony.
3. At the discretion of the entity conducting the expulsion hearing, the complaining witness shall be allowed periods of relief from examination and cross-examination during which the complaining witness may leave the hearing room.
4. The entity conducting the expulsion hearing may also arrange the seating within the hearing room to facilitate a less intimidating environment for the complaining witness.
5. The entity conducting the expulsion hearing may also limit time for taking the testimony of the complaining witness to the hours the complaining witness is normally in school, if there is no good cause to take the testimony during other hours.
6. Prior to a complaining witness testifying, the support persons must be admonished that the hearing is confidential. Nothing in the law precludes the entity presiding over the hearing from removing a support person whom the presiding person finds is disrupting the hearing. The entity conducting the hearing may permit any one of the support persons for the complaining witness to accompany the complaining witness to the witness stand.
7. If one or both of the support persons is also a witness, the Charter School must present evidence that the witness' presence is both desired by the witness and will be helpful to the Charter School. The entity presiding over the hearing shall permit the witness to stay unless it is established that there is a substantial risk that the testimony of the complaining witness would be influenced by the support person, in which case the presiding official shall admonish the support person or persons not to prompt, sway, or influence the witness in any way. Nothing shall preclude the presiding officer from exercising their discretion to remove a person from the hearing whom they believe is prompting, swaying, or influencing the witness.

8. The testimony of the support person shall be presented before the testimony of the complaining witness and the complaining witness shall be excluded from the courtroom during that testimony.
9. Especially for charges involving sexual assault or battery, if the hearing is to be conducted in public at the request of the student being expelled, the complaining witness shall have the right to have their testimony heard in a closed session when testifying at a public meeting would threaten serious psychological harm to the complaining witness and there are no alternative procedures to avoid the threatened harm. The alternative procedures may include videotaped depositions or contemporaneous examination in another place communicated to the hearing room by means of closed-circuit television.
10. Evidence of specific instances of a complaining witness' prior sexual conduct is presumed inadmissible and shall not be heard absent a determination by the entity conducting the hearing that extraordinary circumstances exist requiring the evidence be heard. Before such a determination regarding extraordinary circumstances can be made, the witness shall be provided notice and an opportunity to present opposition to the introduction of the evidence. In the hearing on the admissibility of the evidence, the complaining witness shall be entitled to be represented by a parent, legal counsel, or other support person. Reputation or opinion evidence regarding the sexual behavior of the complaining witness is not admissible for any purpose.
11. The Charter School fully understands and respects a student defendant's constitutional rights to confront and cross examine all witnesses and will, upon request from a student defendant or his/her representative, carefully weigh the probative value of a direct examination of the witness, including the complaining witness, against the potential risk of psychological or physical harm. If direct examination of the witness, including the complaining witness, is deemed critical by the Charter School, then alternative procedures will be implemented that may include, among others, videotaped depositions or contemporaneous examination in another place communicated to all parties by means of closed-circuit television.

G. Record of Hearing

A record of the hearing shall be made and may be maintained by any means, including electronic recording, as long as a reasonably accurate and complete written transcription of the proceedings can be made.

H. Presentation of Evidence

While technical rules of evidence do not apply to expulsion hearings, evidence may be admitted and used as proof only if it is the kind of evidence on which reasonable persons can rely in the conduct of serious affairs. A recommendation by the Administrative Panel to expel must be supported by substantial evidence that the student committed an expellable offense. Findings of fact shall be based solely on the evidence at the hearing. While hearsay evidence is admissible, no decision to expel shall be based solely on hearsay. Sworn declarations may be admitted as testimony from witnesses of whom the Board or Administrative Panel or designee determines that disclosure of their identity or testimony at the hearing may subject them to an unreasonable risk of physical or psychological harm.

If, due to a written request by the expelled student, the hearing is held at a public meeting, and the charge is committing or attempting to commit a sexual assault or committing a sexual battery as defined in Education Code Section 48900, a complaining witness shall have the right to have their testimony heard in a session closed to the public.

I. Expulsion Decision

The decision of the Administrative Panel shall be in the form of written findings of fact and a written recommendation to the SHPS Board of Directors, which will make a final determination regarding the expulsion. The final decision by the SHPS Board shall be made within ten (10) school days following the conclusion of the hearing. The decision of the SHPS Board is final.

If the Administrative Panel decides not to recommend expulsion, or the Board of Directors ultimately decides not to expel, the student shall immediately be returned to their previous educational program.

The Board of Directors may also determine to suspend the enforcement of the expulsion order for a period of not more than one (1) calendar year from the date of the expulsion hearing and return the student to the student's previous educational program under a probationary status and rehabilitation plan to be determined by the Board. During the period of the suspension of the expulsion order, the student is deemed to be on probationary status. The Board of Directors may revoke the suspension of an expulsion order under this section if the student commits any of the enumerated offenses listed above or violates any of the Charter School's rules and regulations governing student conduct. If the Board revokes the suspension of an expulsion order, the student may be expelled under the terms of the original expulsion order. The Board of Directors shall apply the criteria for suspending the enforcement of the expulsion order equally to all students, including individuals with exceptional needs as defined in Education Code Section 56026. The Board of Directors shall further comply with the provisions set forth under Education Code Section 48917, except as otherwise expressly set forth herein.

J. Written Notice to Expel

The Superintendent or designee, following a decision of the SHPS Board to expel, shall send written notice of the decision to expel, including the Board's adopted findings of fact, to the student and student's parent/guardian. This notice shall also include the following: (a) Notice of the specific offense committed by the student; and (b) Notice of the student's or parent/guardian's obligation to inform any new district in which the student seeks to enroll of the student's status with the Charter School.

The Superintendent or designee shall send a copy of the written notice of the decision to expel to the District. This notice shall include the following: (a) The student's name; and (b) The specific expellable offense committed by the student.

Pursuant to Education Code section 47605(e)(3) if a pupil is expelled the Charter School will notify the school district of the pupil's last known address within thirty days and provide a cumulative file upon request. Furthermore, in the event the pupil expelled resides within the District, such written notice will be provided within two business days following the pupil's expulsion from the Charter School. This written notice shall include the pupil's name and the specific expellable offense.

K. Disciplinary Records

The Charter School shall maintain records of all student suspensions and expulsions at the Charter School. Such records shall be made available to the chartering authority upon request.

L. No Right to Appeal

The student shall have no right of appeal from expulsion from the Charter School as the SHPS Board's decision to expel shall be final.

M. Expelled Students/Alternative Education

Pupils who are expelled shall be responsible for seeking alternative education programs including, but not limited to, programs within Sacramento County or their school district of residence. The Charter School shall work cooperatively with parents/guardians as requested by parents/guardians or by the school district of residence to assist with locating alternative placements during expulsion.

N. Rehabilitation Plans

Students who are expelled from the Charter School shall be given a rehabilitation plan upon expulsion as developed by the Board at the time of the expulsion order, which may include, but is not limited to, periodic review as well as assessment at the time of review for readmission. The rehabilitation plan should include a date not later than one (1) year from the date of expulsion when the student may reapply to the Charter School for readmission.

O. Readmission or Admission of Previously Expelled Student

The decision to readmit a student after the end of the student's expulsion term or to admit a previously expelled student from another school district or charter school, shall be in the sole discretion of the Board following a meeting with the Superintendent or designee and the student and student's parent/guardian to determine whether the student has successfully completed the rehabilitation plan and to determine whether the student poses a threat to others or will be disruptive to the school environment. The Superintendent or designee shall make a recommendation to the Board of Directors. The Board shall then make a final decision regarding readmission or admission of the student during the closed session of a public meeting, reporting out any action taken during closed session consistent with the requirements of the Brown Act. The student's readmission is also contingent upon the Charter School's capacity at the time the student seeks readmission or admission to the Charter School.

P. Notice to Teachers

The Charter School shall notify teachers of each student who has engaged in or is reasonably suspected to have engaged in any of the acts listed in Education Code Section 49079 and the corresponding enumerated offenses set forth above.

Q. Special Procedures for the Consideration of Suspension and Expulsion or Involuntary Removal of Students with Disabilities

1. Notification of SELPA

The Charter School shall immediately notify the SELPA and coordinate the procedures in this policy with the SELPA of the discipline of any student with a disability or student who the Charter School or the SELPA would be deemed to have knowledge that the student had a disability.

2. Services During Suspension

Students suspended for more than ten (10) school days in a school year shall continue to receive services so as to enable the student to continue to participate in the general education curriculum, although in another setting (which could constitute a change of placement and the student's IEP would reflect this change), and to progress toward meeting the goals set out in the child's IEP/504 Plan; and receive, as appropriate, a functional behavioral assessment and behavioral intervention services and modifications, that are designed to address the behavior violation so that it does not recur. These services may be provided in an interim alternative educational setting.

3. Procedural Safeguards/Manifestation Determination

Within ten (10) school days of a recommendation for expulsion or any decision to change the placement of a child with a disability because of a violation of a code of student conduct, the Charter School, the parent/guardian and relevant members of the IEP/504 Team shall review all relevant information in the student's file, including the child's IEP/504 Plan, any teacher observations, and any relevant information provided by the parent/guardian to determine:

- a. If the conduct in question was caused by, or had a direct and substantial relationship to, the child's disability; or
- b. If the conduct in question was the direct result of the local educational agency's failure to implement the IEP/504 Plan.

If the Charter School, the parent/guardian and relevant members of the IEP/504 Team determine that either of the above is applicable for the child, the conduct shall be determined to be a manifestation of the child's disability.

If the Charter School, the parent/guardian, and relevant members of the IEP/504 Team make the determination that the conduct was a manifestation of the child's disability, the IEP/504 Team shall:

- a. Conduct a functional behavioral assessment and implement a behavioral intervention plan for such child, provided that the Charter School had not conducted such assessment prior to such determination before the behavior that resulted in a change in placement;
- b. If a behavioral intervention plan has been developed, review the behavioral intervention plan if the child already has such a behavioral intervention plan, and modify it, as necessary, to address the behavior; and
- c. Return the child to the placement from which the child was removed, unless the parent/guardian and the Charter School agree to a change of placement as part of the modification of the behavioral intervention plan.

If the Charter School, the parent/guardian, and relevant members of the IEP/504 team determine that the behavior was not a manifestation of the student's disability and that the conduct in question was not a direct result of the failure to implement the IEP/504 Plan, then the Charter School may apply the relevant disciplinary procedures to children with disabilities in the same manner and for the same duration as the procedures would be applied to students without disabilities.

4. Due Appeals Process

The parent/guardian of a child with a disability who disagrees with any decision regarding placement, or the manifestation determination, or the Charter School believes that maintaining the current placement of the child is substantially likely to result in injury to the child or to others, may request an expedited administrative hearing through the Special Education Unit of the Office of Administrative Hearings or by utilizing the dispute provisions of the 504 Policy and Procedures.

When an appeal relating to the placement of the student or the manifestation determination has been requested by either the parent/guardian or the Charter School, the student shall remain in the interim alternative educational setting pending the decision of the hearing officer in accordance with state and federal law, including 20 U.S.C. Section 1415(k), until the expiration of the forty-five (45) day time period provided for in an interim alternative educational setting, unless the parent/guardian and the Charter School agree otherwise.

In accordance with 20 U.S.C. Section 1415(k)(3), if a parent/guardian disagrees with any decision regarding placement, or the manifestation determination, or if the Charter School believes that maintaining the current placement of the child is substantially likely to result in injury to the child or to others, the parent/guardian, or Charter School may request a hearing.

In such an appeal, a hearing officer may: (1) return a child with a disability to the placement from which the child was removed; or (2) order a change in placement of a child with a disability to an appropriate interim alternative educational setting for not more than 45 school days if the hearing officer determines that maintaining the current placement of such child is substantially likely to result in injury to the child or to others.

5. Special Circumstances

Charter School personnel may consider any unique circumstances on a case-by-case basis when determining whether to order a change in placement for a child with a disability who violates a code of student conduct.

The Superintendent or designee may remove a student to an interim alternative educational setting for not more than forty-five (45) school days without regard to whether the behavior is determined to be a manifestation of the student's disability in cases where a student:

- a. Carries or possesses a weapon, as defined in 18 U.S.C. Section 930, to or at school, on school premises, or to or at a school function;
- b. Knowingly possesses or uses illegal drugs, or sells or solicits the sale of a controlled substance, while at school, on school premises, or at a school function; or
- c. Has inflicted serious bodily injury, as defined by 20 U.S.C. Section 1415(k)(7)(D), upon a person while at school, on school premises, or at a school function.

6. Interim Alternative Educational Setting

The student's interim alternative educational setting shall be determined by the student's IEP/504 team.

7. Procedures for Students Not Yet Eligible for Special Education Services

A student who has not been identified as an individual with disabilities pursuant to IDEA and who has violated the Charter School's disciplinary procedures may assert the procedural safeguards granted under this administrative regulation only if the Charter School had knowledge that the student was disabled before the behavior occurred.

The Charter School shall be deemed to have knowledge that the student had a disability if one of the following conditions exists:

- a. The parent/guardian has expressed concern in writing, or orally if the parent/guardian does not know how to write or has a disability that prevents a written statement, to Charter School supervisory or administrative personnel, or to one of the child's teachers, that the student is in need of special education or related services.
- b. The parent/guardian has requested an evaluation of the child.
- c. The child's teacher, or other Charter School personnel, has expressed specific concerns about a pattern of behavior demonstrated by the child, directly to the director of special education or to other Charter School supervisory personnel.

If the Charter School knew or should have known the student had a disability under any of the three (3) circumstances described above, the student may assert any of the protections available to IDEA-eligible children with disabilities, including the right to stay-put.

If the Charter School had no basis for knowledge of the student's disability, it shall proceed with the proposed discipline. The Charter School shall conduct an expedited evaluation if requested by the parents; however, the student shall remain in the education placement determined by the Charter School pending the results of the evaluation.

The Charter School shall not be deemed to have knowledge that the student had a disability if the parent/guardian has not allowed an evaluation, refused services, or if the student has been evaluated and determined to not be eligible.



ELEMENT 11

STAFF RETIREMENT SYSTEMS



ELEMENT 11: STAFF RETIREMENT SYSTEMS

Governing Law: The manner by which staff members of the charter schools will be covered by the State Teachers' Retirement System, the Public Employees' Retirement System, or federal social security. Education Code Section 47605(c)(5)(K).

ASSURANCES

Sac High will make any contribution that is legally required of the employer, which may include the State Teachers' Retirement System ("STRS"), Social Security, and unemployment insurance. Appropriate SHPS staff are responsible for ensuring that all mandatory contributions and deductions are made for all SHPS employees.

NON-CERTIFICATED EMPLOYEES

Non-certificated employees will participate in the federal social security program and are currently eligible to participate in a 401(k) retirement program.

STATE TEACHERS' RETIREMENT SYSTEM

Sac High certificated teachers and eligible administrators are currently part of the State Teachers' Retirement System. Employees will accumulate service credit years in the same manner as all other members of STRS. The District will cooperate as necessary to forward any required payroll deduction reports as required by Education Code Section 47611.3(a).

Certificated employees of SHPS currently participate in STRS and a 401k retirement program.





ELEMENT 12

ATTENDANCE ALTERNATIVES



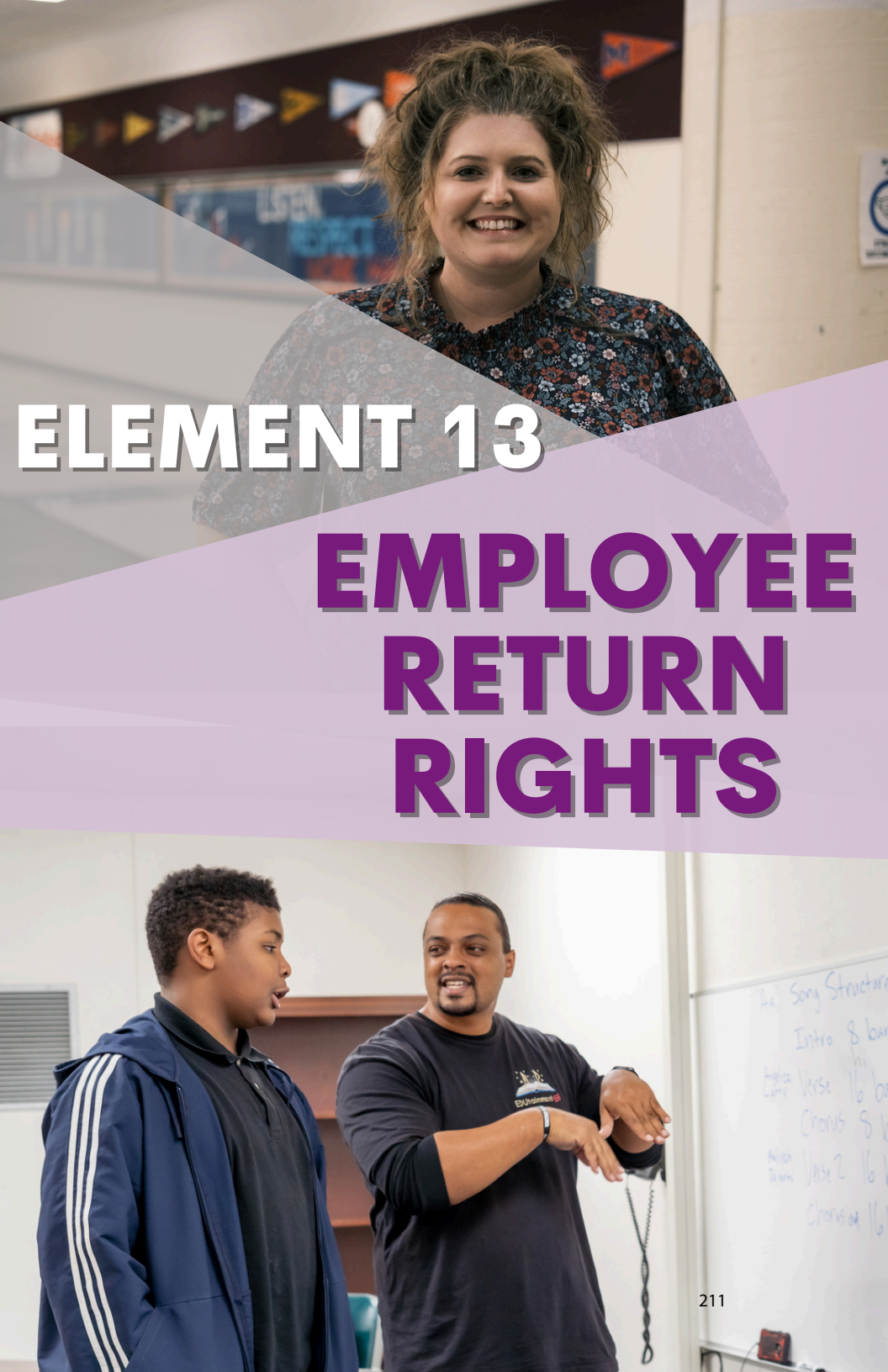
ELEMENT 12: ATTENDANCE ALTERNATIVES

Governing Law: The public school attendance alternatives for pupils residing within the school district who choose not to attend charter schools. Education Code Section 47605(c)(5)(L).

Sac High is a school of choice and, as such, no student may be required to attend the Charter School. Pupils who choose not to attend Sac High may choose to attend other public schools in their district of residence or pursue an inter-district transfer in accordance with existing enrollment and transfer policies of the district. If a student decides to transfer from Sac High, the Charter School will provide that student with a copy of their most recent report card, transcript and current grades at the time of disenrollment.

Parents or guardians of each student enrolled in the Charter School will be informed on admissions forms that students have no right to admission in a particular school of any local educational agency as a consequence of enrollment in the Charter School, except to the extent that such a right is extended by the local educational agency.





ELEMENT 13

EMPLOYEE RETURN RIGHTS

ELEMENT 13: EMPLOYEE RETURN RIGHTS

Governing Law: The rights of an employee of the school district upon leaving the employment of the school district to work in a charter school, and of any rights of return to the school district after employment at a charter school. Education Code Section 47605(c)(5)(M).

Employment by the Charter School provides no rights of employment at any other entity, including any rights in the case of closure of the Charter School.

No public school district employee shall be required to work at the Charter School. Employees of the District, or other LEAs, who choose to leave their place of employment to work at Sac High shall have no automatic rights of return after employment at the Charter School unless specifically granted by the school district or LEA they left through a leave of absence or other agreement or policy. Sac High employees have any right upon leaving the District to work in the Charter School that the District may specify, any rights of return to employment in a school district after employment in the Charter School that the District may specify, and any other rights upon leaving employment to work in the Charter School that the District determines to be reasonable and not in conflict with any law.

Sac High is an independent charter school. Vacation leave or years of service credit at the District or any other school district may not be transferred to the Charter School. SHPS has its own sick and vacation policy for employees which can be found in the SHPS staff handbook located in Appendix 6. Employees of SHPS are considered "at will" employees. Exempt employees are paid a salary and nonexempt employees are paid on an hourly basis. SHPS offers employees a complete and comprehensive benefit package which includes medical, dental, vision, and retirement benefits. Furthermore, SHPS is responsible for the payment of social security and other applicable taxes for Sac High employees.





ELEMENT 14

DISPUTE RESOLUTION PROCESS



ELEMENT 14: DISPUTE RESOLUTION PROCESS

Governing Law: The procedures to be followed by the charter school and the chartering authority to resolve disputes relating to provisions of the Petition. Education Code Section 47605(c)(5)(N).

DISPUTE RESOLUTION PROCEDURE

The staff Sac High and governing board members of SHPS agree to attempt to resolve all disputes with the District regarding this Petition pursuant to the terms of this section. In the event the District Board of Education believes the dispute relates to an issue that could lead to revocation of the Petition in accordance with Education Code Section 47607, SHPS and Sac High request this shall be noted in the Written Notification, although it recognizes it cannot legally bind the District to do so. However, participation in the dispute resolution procedures outlined in this section shall not be interpreted to impede or act as a prerequisite to the District's ability to proceed with revocation in accordance with Education Code Section 47607 and its implementing regulations.

During its more than twenty years of operation, SHPS has not been faced with a dispute relating to the provisions of its existing charter petitions with the District that could not be resolved. SHPS and its staff appreciate the relationship they share with the District and desire that all disputes, if any, in regards to Sac High be resolved, where possible, in an informal manner. With that said, however, should a dispute arise between Sac High and the District over the provisions of the Petition that cannot be resolved informally, the following modified and streamlined procedures are suggested until resolution is reached:

1. Any controversy, claim, or dispute arising out of or relating to the Petition, or the breach thereof, must be submitted in writing ("Written Notification"). The Written Notification must identify the nature of the dispute. The Written Notification may be tendered by personal delivery, by facsimile, or certified mail. The Written Notification shall be deemed received (a) if personally delivered, upon date of delivery to the address of the person to receive such notice if delivered by 5:00 p.m., or otherwise on the business day following personal delivery; (b) if by facsimile, upon electronic confirmation of receipt; or (c) if by mail, two (2) business days after deposit in the U.S. Mail. Written Notifications shall be addressed as follows:

To Charter School:

Superintendent
2315 34th Street
Sacramento, CA 95817
Facsimile: (916) 277-7105

To the Chartering Authority:

Superintendent
Sacramento City Unified School District
5735 47th Avenue
Sacramento, CA 95824
Facsimile: (916) 643-9480

2. A written response ("Written Response") shall be tendered to the other party within ten (10) business days from the date of receipt of the Written Notification. The parties agree to schedule a conference to discuss and resolve the controversy, claim, or dispute at issue ("Issue Conference"). The Issue Conference shall take place within ten (10) business days from the date the Written Response is received by the other party. The Written Response may be tendered by personal delivery, by facsimile, or by certified mail. The Written Response shall be deemed received (a) if personally delivered, upon date of delivery to the address of the person to receive such notice if delivered by 5:00 p.m., or otherwise on the business day following personal delivery; (b) if by facsimile, upon electronic confirmation of receipt; or (c) if by mail, two (2) business days after deposit in the U.S. Mail.

3. If the Issue Conference is not successful, then the parties agree to settle the controversy claim, or dispute by mediation conducted by a neutral third party mediator to engage the parties in a mediation session designed to facilitate resolution of the dispute. The mediation session shall be held within thirty (30) days of the issue conference date. If both parties are in agreement of mediation, the costs shall be equally split between the District and Charter School. If mediation does not resolve the dispute, then either party may pursue any other remedy available under the law.

4. Any party who fails or refuses to submit to mediation shall bear all costs and expenses incurred by such other party in compelling mediation of any controversy, claim, or dispute.

5. All language in this section may be revised upon mutual written agreement of the District and Charter School.

OTHER DISPUTES

Should a dispute arise between Sac High and an entity other than the District, SHPS has established policies for how these disputes are to be addressed and resolved. These policies can be found in Appendix 14.

INTERNAL DISPUTES

SHPS maintains an internal dispute resolution process to be used for all internal disputes related to Sac High and SHPS operations. Parents, students, board members, volunteers, and staff at SHPS will be provided with a copy of SHPS' policies and internal dispute resolution process and it will be accessible via the SHPS' website. The District will refer all disputes not related to a possible violation of the Petition or law to SHPS.

UNIFORM COMPLAINT PROCEDURES

SHPS is responsible for complying with applicable state and federal laws and regulations governing educational programs. SHPS has adopted Uniform Complaint Procedures ("UCP") to address allegations of unlawful discrimination, harassment, intimidation, and bullying, and complaints alleging violation of certain state or federal laws governing educational programs, the charging of unlawful pupil fees and the non-compliance with the LCAP.





ELEMENT 15

PROCEDURES FOR SCHOOL CLOSURE



ELEMENT 15: PROCEDURES FOR SCHOOL CLOSURE

Governing Law: The procedures to be used if the charter school closes. The procedures shall ensure a final audit of the charter school to determine the disposition of all assets and liabilities of the charter school, including plans for disposing of any net assets and for the maintenance and transfer of pupil records. Education Code Section 47605(c)(5)(O).

CLOSURE PROCEDURES

The following are closing procedures that abide by Education Code Section 47605(c)(5)(O) and the California Code of Regulations, Title 5, Section 11962, should the Charter School close for any reason. Closure of Sac High will be documented by official action of the SHPS Board of Directors. In the event of such a Closure Action the Superintendent, or other individual designated by the Board, will be the responsible entity to conduct the closure related activities on behalf of the Charter School. Additionally, the following steps are to be implemented:

1. Written notification to parents/guardians/caregivers of the enrolled students of Sac High will be issued by the Charter School promptly following the determination of a Closure Action. A sample copy of the language used in the written notification is also to be made available to the District within the same time frame.

- a. The written notification will also include information on assistance in transferring each student to another appropriate school, and a process for the transfer of all student records, which shall be done in compliance with FERPA.

- b. The process for transferring student records to the receiving schools shall be in accordance with the District procedures for students moving from one school to another.

- c. Parents will also be provided with student information that includes the closure notice, grade reports, discipline records, immunization records, and completed coursework and credits that meet graduation requirements.

2. Written notification to the District of the list of returning students and their home schools, to be made promptly following the determination of the Closure Action.

3. Transfer of student records to the receiving schools.

4. Written notification to the CDE and the District of the Closure Action shall be made by Sac High by registered mail promptly following the decision to Closure Action.

5. Written notification to the special education local plan area in which the Charter School participates as well as the retirement systems in which the Charter School's employees participate.

6. All written notifications described above will also include the name(s) of and contact information for the person(s) to whom reasonable inquiries may be made regarding the closure.

7. Sac High shall allow the District access, inspection and copies of all school records, including financial and attendance records, upon written request by the District.

8. Sac High will ask the District to store the original records of Sac High students. All student records of Sac High shall be transferred to the District upon closure. If the District will not or cannot store the records, Sac High shall work with the Sacramento County Office of Education to determine a suitable alternative location for storage.

9. A financial closeout audit of the Charter School will be paid for by Sac High to determine the disposition of all assets and liabilities of the Charter School, including plans for disposing of any net assets. The final independent audit shall be completed within six months after the closure of the Charter School. This audit will be conducted by a neutral, independent licensed CPA who will employ generally accepted accounting principles. Any liability or debt incurred by Sac High will be the responsibility of the Charter School and not the District. Sac High understands and acknowledges it will cover the outstanding debts or liabilities of the Charter School, unless otherwise agreed to. Any unused monies at the time of the audit will be returned to the appropriate funding source. Sac High understands and acknowledges that only unrestricted funds will be used to pay creditors. Any unused AB 602 funds will be returned to the SELPA, and other categorical funds will be returned to the source of funds.

10. For six calendar months from the Closure Action or until the budget allows, whichever comes first, sufficient staff as deemed appropriate by the SHPS Board of Directors, will maintain employment to take care of all necessary tasks and procedures required for a smooth closing of the Charter School and student transfers.

11. The SHPS Board of Directors shall adopt a plan for wind-down of the Charter School and, if applicable, the SHPS corporation, in accordance with the requirements of the Corporations Code.

12. On closure of Sac High, all assets of Sac High, including but not limited to all leaseholds, personal property, intellectual property and all ADA apportionments and other revenues generated by students attending Sac High, remain the sole property of SHPS and, upon the dissolution of the SHPS non-profit public benefit corporation ("Corporation"), shall be distributed in accordance with the SHPS Articles of Incorporation.

13. In addition to a final audit, Sac High will also submit any required year-end financial reports to the California Department of Education and the District in the form and time frame required, pursuant to Education Code Section 47604.33.

14. All state assessment results, special education records, and personnel records will be transferred to and maintained by the entity responsible for closure-related activities in accordance with applicable law.

15. Assets of the Corporation will remain assets of the Corporation following a closure of Sac High. Should SHPS, the Corporation, dissolve, its wind-down procedures are governed by, as all California corporations are, its Articles of Incorporation filed with the California Secretary of State's office. The SHPS Board will follow the procedures set forth in the California Corporations Code for the dissolution of a non-profit public benefit corporation and complete all necessary filings with the appropriate state and federal agencies.

16. Sac High will utilize its reserve fund to undertake any expenses associated with the closure procedures identified above.





Miscellaneous Provisions



MISCELLANEOUS PROVISIONS

Budget and Financial Reporting Governing Law: "The petitioner or petitioners also shall be required to provide financial statements that include a proposed first year operational budget, including startup costs, and cash flow and financial projections for the first three years of operation." Education Code Section 47605(h).

BUDGET

The Sac High budget was designed to identify the costs associated with the operation of a charter school serving a population of students in grades 9–12. The budget was completed based on published information on the state direct funding model and a school design that maximizes the revenue that is generated. In addition, since Sac High is operated by a larger non-profit, St. HOPE Public Schools, revenue is transferred from the Charter School to SHPS to cover certain operating costs including legal services, reporting and other compliance related tasks that are more cost efficient when centralized within SHPS versus being completed by the individual schools operated by SHPS.

EXPENDITURES AND REVENUE NARRATIVE

The Sac High budget is provided in Appendix B. Also included in the budget are the required financial projections. The budget, located in Appendix B, details the projected expenditures and revenue. The annual budget includes estimated revenues and expenditures with reserves to accommodate cash flow. Sac High projections include revenue that exceeds expenditures.

The budget projects enrollment at Sac High will remain at its current level and that student retention will improve with the addition of new programs, such as the Panther Pipeline which provides students the opportunity for dual enrollment where they earn college credits. While the Charter School fully expects to increase enrollment in future years, SHPS is taking a fiscally conservative approach with the future projections.

Historically, the cadence at which St. HOPE Public Schools receives revenue (local, state and federal) does not fit perfectly with the Charter School's spending patterns. As a result, the organizational cash flow of St. HOPE Public Schools does reflect months where expenditures exceed net cash. SHPS is effective at predicting these instances in advance, and plans for them accordingly. Expenditures are adjusted where possible. Where that does not solve the problem, Sac High has established close relationships with financial institutions and close partners (including SCUSD) that have provided bridge financing for the organization.

DISTRICT OVERSIGHT COSTS

In accordance with Education Code Section 47613, the District may charge for the actual costs of supervisorial oversight of Sac High not to exceed 1% of the Charter School's revenue, or the District may charge for the actual costs of supervisorial oversight of Sac High not to exceed 3% if the Charter School is able to obtain substantially rent free facilities from the District.

REPORTING

The Charter School shall provide reports to the District and the County as follows in accordance with Education Code Section 47604.33, and may provide additional fiscal reports as requested by the District:

1. By July 1, a preliminary budget for the current fiscal year.
2. By July 1, an annual update (LCAP) required pursuant to Education Code Section 47606.5.
3. By December 15, an interim financial report for the current fiscal year reflecting changes through October 31. Additionally, on December 15, or by the required deadline, a copy of the Charter School's annual, independent financial audit report for the preceding fiscal year shall be delivered to the District, State Controller, State Department of Education and County Superintendent of Schools.
4. By March 15, a second interim financial report for the current fiscal year reflecting changes through January 31.
5. By September 15, a final unaudited report for the full prior year. The report submitted to the District shall include an annual statement of all the Charter School's receipts and expenditures for the preceding fiscal year.

INSURANCE

The Charter School has acquired and financed general liability, workers compensation, and other necessary insurance of the types and in the amounts required for an enterprise of similar purpose and circumstance. Coverage amounts are based on recommendations provided by the District and the Charter School's insurer. The District Board of Education shall be named as an additional insured on all policies of the Charter School. Evidence of the above insurance coverage is on file at the Charter School and available in Appendix 9.

ADMINISTRATIVE SERVICES

Governing Law: "The manner in which administrative services of the charter school are to be provided." Education Code Section 47605(h).

Sac High and SHPS provide or procure most of the needed administrative services including, but not limited to, financial management, personnel, and instructional program development either through its own staff or through an appropriately qualified third-party contractor. The Charter School may be interested in discussing the possibility of purchasing administrative services from the District. If the District is interested, the specific terms and cost for these services will be the subject of an annual memorandum of understanding between the Charter School and the District and subject to District availability and willingness to provide such services.

FACILITIES

Governing Law: "The facilities to be used by the charter school. The description of the facilities to be used by the charter school shall specify where the charter school intends to locate." Education Code Section 47605(h).

Sac High's campus is located at 2315 34th Street in Sacramento.

POTENTIAL CIVIL LIABILITY EFFECTS

Governing Law: "Potential civil liability effects, if any, upon the charter school and upon the school district." Education Code Section 47605(h).

The Charter School is operated by SHPS, a California nonprofit public benefit corporation. This corporation is organized and operated exclusively for charitable purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code and California Revenue and Taxation Code Section 23701(d).

Pursuant to Education Code Section 47604(d), an entity that grants a charter to a charter school operated by or as a non-profit public benefit corporation shall not be liable for the debts or obligations of the charter school, or for claims arising from the performance of acts, errors or omissions by the charter school if the authority has complied with all oversight responsibilities required by law. Sac High shall work diligently to assist the District in meeting any and all oversight obligations under the law, including authorizer-requested protocol to ensure the District shall not be liable for the operation of Sac High's Petition.

Further, Sac High and the District shall renew an operational memorandum of understanding, wherein Sac High shall indemnify the District for the actions of Sac High under this charter.

The corporate bylaws of SHPS provide for indemnification of the SHPS' Board, officers, agents, and employees, and SHPS has purchased general liability insurance, Board Members and Officers insurance, and fidelity bonding to secure against financial risks.

TRANSPORTATION

The Charter School will not provide transportation to and from school, except as required by law for students with disabilities in accordance with a student's IEP.

RENEWAL TERM

Pursuant to Education Code Section 47607.2(b), the term of this renewal charter shall be for a period of five years from July 1, 2025 through June 30, 2030.



Conclusion



CONCLUSION

The California Charter Schools Act of 1992 was created to provide opportunities for teachers, parents, pupils, and community members to establish and maintain schools that operate independently from the existing school district structure, as a method to accomplish all of the following:

- (a) Improve pupil learning.
- (b) Increase learning opportunities for all pupils, with special emphasis on expanded learning experiences for pupils who are identified as academically low achieving.
- (c) Encourage the use of different and innovative teaching methods.
- (d) Create new professional opportunities for teachers, including the opportunity to be responsible for the learning program at the school site.
- (e) Provide parents and pupils with expanded choices in the types of educational opportunities that are available within the public school system.
- (f) Hold the schools established under this part accountable for meeting measurable pupil outcomes, and provide the schools with a method to change from rule-based to performance-based accountability systems.
- (g) Provide vigorous competition within the public school system to stimulate continual improvements in all public schools.

By renewing this charter term, the Sacramento City Unified School District will be fulfilling the intent of the Charter Schools Act of 1992 and following the directive of law that encourages the creation of charter schools. SHPS and Sac High look forward to continuing the long-standing partnership with the District, now in its third decade.

Sacramento Charter High School and St. HOPE Public Schools are honored for the opportunity to apply for a renewal of a five-year charter for the term July 1, 2025 through June 30, 2030, for the opportunities that come with such a responsibility to serve families in Sacramento and to work with the District to provide the best possible educational opportunities for all students.