STATE BOARD OF EDUCATION – TOPIC SUMMARY Topic: Request for State Board Sponsorship: Josephine County Charter School Date: August 2014 Staff/Office: Kate Pattison/Office of Learning Action Requested: Informational Only Adoption Later Adoption Adoption/Consent Agenda

ISSUE BEFORE THE BOARD:

Whether to sponsor the Josephine County Charter School located in the Grants Pass School District.

BACKGROUND:

The Josephine County Charter School (JCCS) is a proposed comprehensive 9-12 charter school located in the Grants Pass School District (GPSD) using small class size to serve students at risk of graduating from high school. Modeled after the developer's previous alternative school and using curriculum from the Eagle Ridge Charter High School in Klamath Falls, the projected enrollment for the first year is 40-50 students in grades 9-12 with up to 450 students in middle and high school after five years. The Grants Pass School District has an enrollment of approximately 5,800 students.

As stated in the proposal, the Josephine County Charter School's mission is:

To ensure students' growth and confidence, the Josephine County Charter School will establish a maximum student/teacher ratio of 15:1. If the enrollment exceeds this ratio, new teachers will be hired immediately.

JCCS submitted its application to the GPSD for sponsorship in November 2013 and was denied on January 28, 2014. The basis for the 2014 GPSD denial was summarized by the GPSD in their denial notice dated February 4, 2014 as:

- The lack of adequate detail and specificity in critical charter school elements as
 required under state law and Board policy in the areas of school governance
 sustainability, curricular content for all required subject areas, ability to recruit and
 retain highly qualified teachers in these subject areas, supportable financial
 assumptions to support financial projections and the administrative depth to comply
 with all applicable federal and state mandated reporting requirements and related
 submissions;
- Inconsistency in identifying the student populations to be served by the proposed charter school (at-risk, home schooled and online students in Josephine County) and the challenges associated with serving these diverse student groups; and
- 3. Failure to establish that GPSD resident students in the target population groups are not being adequately served with existing GPSD programs and services.

ORS 338.075 states "If a school district board does not approve a proposal to start a public charter school pursuant to ORS 338.055, the applicant may request that the State Board of Education review the decision of the school district board."

On January 29, 2014, the Oregon Department of Education (ODE) received JCCS' appeal and request for sponsorship by the State Board of Education. Following the established appeal and sponsorship process, Department staff conducted a substantive review of the proposal using criteria set forth in ORS 338.045 and 338.055. A review panel consisted of internal and external reviews with expertise in curriculum, school finance, governance and innovative learning models.

The review was completed in May 2014 and the review panel indicated the proposal did not meet many of the proposal requirements nor did the panel find the proposal to meet many of the evaluation criteria.

Below is a summary of the proposal requirements and the evaluation criteria rated as "does not meet."

ORS 338.045 Proposal Requirements

- (c) A description of the philosophy and mission of the public charter school
- (d) A description of the curriculum of the public charter school
- (e) A description of the expected results of the curriculum and the verified methods of measuring and reporting objective results that will show the growth of knowledge of students attending the public charter school and allow comparisons with public schools
- (f) The governance structure of the public charter school
- (h) The target population of students the public charter school will be designed to serve
- (m) The proposed budget and financial plan for the public charter school and evidence that the proposed budget and financial plan for the public charter school are financially sound
- (n) A description of the financial management system for the public charter school, an explanation of how the financial management system will meet the requirements of ORS 338.095 (1) and a plan for having the financial management system in place at the time the school begins operating
- (t) Information on the manner in which community groups may be involved in the planning and development process of the public charter school

ORS 338.055 (2) Evaluation Criteria

- (a) The demonstrated, sustainable support for the public charter school by teachers, parents, students and other community members, including comments received at the public hearing held under subsection (2) of this section
- (b) The demonstrated financial stability of the public charter school, including the demonstrated ability of the school to have a sound financial management system that is in place at the time the school begins operating and that meets the requirements of ORS 338.095 (1)
- (c) The capability of the applicant, in terms of support and planning, to provide comprehensive instructional programs to students pursuant to an approved proposal
- (e) The adequacy of the information provided as required by ORS 338.045 (2) and (3)
- (f) Whether the value of the public charter school is outweighed by any directly identifiable, significant and adverse impact on the quality of the public education of students residing in the school district in which the public charter school will be located

GPSD staff and the JCCS developers were provided the opportunity to address the Board at the June 2014 State Board meeting. This item is before the State Board of Education for a second read, discussion, and final decision at the August meeting.

POLICY QUESTIONS:

None at this time.

STAFF RECOMMENDATION:

The Superintendent and ODE Staff recommend the State Board of Education deny the sponsorship request of the Josephine County Charter School.

ATTACHMENTS:

Combined Report: Oregon State Board of Education Charter School Proposal Review and Analysis Rubric

Oregon State Board of Education Charter School Proposal Review and Analysis Rubric

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
(a) The identification of the applicant	Applicant identification is evidenced by a listing of the names of key school founders.
	Preferable factors
	 Specification of each person's role with the proposed school and relevant experience/expertise.
	Explain rationale for rating:
	No roles or relevant expertise are provided for founding members (p 34, Proposal).
	The applicant entity, The Inn Between Incorporated, is identified at p.3. However, key school founders and each of their specific roles are not listed in the application or appendices. It is not clear if the governing board and steering committee members listed at pp. 34-35 are key founders or, if they are, what their specific roles with the proposed charter school are or will be.
	Basic information provided on current school board. Preferable factors not present (no clear delineation of roles with job descriptions). Also current staff of school are mentioned as filling the role of teacher/director, but no name is given.
	Pg. 34 of proposal. List of governing board – 5 members of the Inn Between Governing Board listed, who will act as governing board of the new JCCS, if approved. There are two members (40%) of the governing board that will be "possibly retiring". The expertise of the governing board was not discussed – but the expertise of the Steering Committee was discussed.
	Governing Board exists from Inn Between, previous alternative school. 5 Community members (2 are retiring and will be replaced with parents or other community members). A steering committee is designed with roles and responsibilities defined - member names and e-mails – however no specific expertise noted.

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
(b) The name of the proposed public charter school	The proposed public charter school name is evidenced by a clear indication of the name.
	Preferable factors • A consistent use of the name throughout the proposal.
	Explain rationale for rating: Name is used consistently.
	The proposed public charter school name is at p. 3: Josephine County Charter School (JCCS).
	Pg. 2 of Proposal.
(c) A description of the philosophy and mission of the public charter school	The philosophy is evidenced by a clear description of the proposed school's approach to education. The mission is evidenced by clear statements that convey the school's vision for the education of its students.
	Preferable factors
	Clear, focused and compelling
	Likely to improve education outcomes
	Expresses a clear guiding purpose
	 Identifies priorities that are consistent with the intent of ORS 338.015
	☐ 1 Meets
	Explain rationale for rating: The Mission Statement does not clearly state a mission (p 3 Proposal). One has to tease out the elements of Direct Instruction provided to atrisk youth, targeted at core knowledge gaps. Project-based learning is mentioned on p 5 but not in the mission statement. Proficiency based learning is mentioned on p 6, 8, 9, 10, but not in the mission statement.
	The Proposal would be strengthened by a mission statement which clearly delineates who the school is designed to teach, and how the proposed curriculum is designed to meet specific targeted needs.
	Applicant's philosophy and mission statements at pp. 3-4 mostly describe a business or operational plan. The philosophy statement does express JCCS's goal to "change the dynamic of our community by providing it with young adults that have the knowledge and confidence

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	to become motivated resources for our working community." The mission states, in part, that the "main focus for the staff will be to identify the gaps that each student has in their core knowledge (basic reading, writing, math, and critical thinking abilities)." More attention to the priorities listed in ORS 338.015 would strengthen this section.
	The core of their philosophy seems to hinge on a small school setting and low student-teacher ratio. Besides this information and the indication that they will be modeled after and trained by Eagle Ridge Charter High School in Klamath Falls. Mention is made of project-based learning, but no description is present.
	Pg. 3 of Proposal. Mission statement is a statement of class size. Vision statement not clearly defined. JCCS wishes to "create: young adults that have the knowledge and confidence to become motivated resources for our working community". No clear mission or vision that would guide the school toward excellence in project based learning.
	Pg.3 Vision and Mission included, however not sure that enrollment ratio is part of a mission statement.
(d) A description of the curriculum of the public charter school	The curriculum description is evidenced by an explanation of the instructional approach/methodology and an outline of each content area addressed within the public charter school. The description includes how the school's comprehensive education program will meet the needs of ALL students, particularly academically low-achieving students
	Preferable factors
	 Curriculum framework is clearly presented, aligned with the school's mission, and provides an appropriate level of detail for objectives, content, and skills for each subject and for all grades the school will serve Curriculum is supported by research and/or by applicant
	experienceEducational program is a good match for the target student
	 population A clear outline of how the school will monitor the implementation of the curriculum
	A cohesive and coherent description of all components
	☐ 1 Meets
	Explain rationale for rating:

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	Project-based learning described (p 5, Proposal).
	Common literacy strategies referenced (p 6, Proposal).
	JCCS describes its partnership with Eagle Ridge High School (p 6) and the agreement to share curriculum, rubrics, and grading procedures. Good examples are provided (p 10-16 Proposal). This partnership provides access to a proven curriculum.
	Proficiency based learning is referenced (p 6) and further detailed on p 8, 9, 10 (Proposal).
	Use of Integrated thematic units is referenced (p 6, Proposal).
	Emphasis on Career Tech Ed is referenced (p 7, Proposal).
	The critical linkage between the target population (students who desire smaller, more personal learning environment and ownership of learning process, credit deficient students, p 4) and the curriculum framework (relationship-based, thematic, project based, proficiency based, p 5-17), is not explicitly stated, but it is reasonable to assume that the curriculum described would fit the needs of the target population. The Proposal would be strengthened by providing a rationale for why this curriculum framework was selected.
	The Proposal would be strengthened by explaining how JCCS will be able to recruit and retain HQ teachers for all core areas required for graduation, including second language, PE, Health, and electives, and the proposed CTE courses (p 7 Proposal). JCCS proposes a partnership with Rogue Community College to fill this need, but provides no evidence of the availability of courses that will fill these requirements, nor a budget for paying for this coursework.
	I am unable to determine if the proposed teaching techniques are distinctive from what is already offered in GP regular and alternative high schools.
	Applicant does not present the required "explanation of the instructional approach/methodology and an outline of each content area addressed within the [proposed] charter school." For example, Applicant presents lists of course titles, but course titles are not curricula. At pp. 10-16, the application includes what appear to be example project scoring guides in language arts, but none for any other subjects. Descriptions of methods, materials, and assessments across the proposed subjects and grade levels served, and how they align with Applicant's philosophy and mission, would strengthen this section.
	The application states at p.8 that "JCCS will hire its qualified staff with the expectations that each will provide a curriculum that provides an education outlined by the state's content and standard requirements.

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	The steering committee will evaluate and compare each teacher's curriculum with those requirements mandated by the State of Oregon." However, the framework for the steering committee's evaluation is not clear. It is also not clear how JCCS's proposed hiring process and the steering committee's proposed review process would affect JCCS's plans for a school opening date. If the steering committee does not approve a proposed curriculum, would the school opening be delayed until a curriculum is approved?
	At page 6, the application states, "In our partnership, Eagle Ridge High School has agreed to supply our new teaching staff with the curriculum, rubrics, and grading procedures that has allowed them to be one of the most successful schools in Oregon. In this, we have made plans to participate in workshops at their school in an effort to introduce and teach us the format of their success." If that is so, then Applicant might have included that package in this application. (It is not clear if or how much Eagle Ridge High School (ERHS) would charge JCCS for those materials.) (ERHS's home page does not indicate ERHS is a charter school. The ODE's list of charter schools shows that it is.)
	At pages 8-9, the application lists 8 tasks "each staff member will be required to do" when "using proficiencies as an assessment." The tasks include identifying 9 standards for each semester, regular formative assessments, "four steps of understanding," "understanding of the Big Ideas of Essential Questions," construction of scoring rubrics, a proficiency based grading system, and building course syllabi. It is not clear if or how those tasks will be done prior to the school's proposed opening date. It is also not completely clear how ERHS's curriculum and assessments are proficiency-based or, if they are, how much and what kinds of curriculum and assessment materials will be available to JCCS from ERHS.
	It is not clear which standards JCCS would use to measure proficiency, or how many demonstrations of proficiency JCCS would require to determine proficiency. For example, what are the standards JCCS will use to determine a student is ready to "pursue a post-secondary education, to enter the workforce, or to become a productive citizen in society"? Page 17 of the application states, "The licensed teachers will develop course expectations directly related to the Oregon State Standards and other appropriate standards-based criteria such a College Board Standards for College Success, the Proficiency-based Admission Standards System, and any other state or nationally recognized standards" (emphasis added). A potential sponsor needs to know which standards and assessments will be used, how, and why.

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	education program will meet the needs of ALL students, particularly academically low-achieving students." The description of special education services at p. 21 of the application does not satisfy this requirement.
	The application proposes that the research base for Applicant's proposed curriculum is the success achieved by ERHS. It would help to know if there is underlying research that ERHS relied on when choosing its curriculum. (ERHS's 2012-2013 Oregon School Report Card shows ERHS performed above average when compared to similar schools and rated an overall 4 out of possible 5. Applicant might have included that information and more to support its reliance on ERHS curricula.)
	At page 6, the application states JCCS "will also utilize the professional development system used by Eagle Ridge High School that includes the support, training and access to the Buck Institute of Education's national resources." It would help to know what the Buck Institute provides, how that aligns with Applicant's proposed program, and the projected costs of such trainings.
	It would help to have more specific examples of how the proposed curriculum, including resources to be provided by ERHS and the Buck Institute, are good matches for the proposed target population.
	It is not clear how JCCS would monitor and, if necessary, adjust the implementation of its curriculum.
	The appendices submitted with the application do not provide enough additional information to rate this section Meets.
	Curriculum description is thin at best. Core philosophy, again, seems to be a small school. While valuable, there are no citations to research to back up their claims of the small school value. Block schedules and sample student schedules are included and two samples from lessons done at Eagle Ridge. Insufficient explanation of how this philosophy meets the needs of target students.
	Pg. 5 of the proposal. The curriculum of Eagle Creek High School is described, no curriculum frameworks were provided. All discussion was at a very high level and did not provide a curriculum framework that would support these "at risk" learners. They are "waiting" to hire the teachers so that they create the curriculum. This would be very difficult for "new" teachers to accomplish in a successful way. How does this particular curriculum help the intended population of "at risk" students who would attend JCCS?
	Proposal states that the curriculum will be proficiency based, with a service learning component for each student as outlined in a yearly

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	learning plan. (16).
	Teachers will monitor effectiveness and be trained by K-Falls Eagle Ridge HS in curriculum and assessments.
	No course catalog or a clear description of each content area is included. A global explanation stating that students will be instructed through integrated thematic units that combine core curriculums of Math/Science and Language Arts/Social Studies.
	A sample curriculum from K-Falls Eagle Ridge HS is included as an example of what the Charter will develop in the future.
	No mention of how program will meet the needs of all students - particularly low achieving, SPED, TAG or ELL students within the classroom.
	This section of the plan indicates that the school is responsible for providing the program and students and families are accountable to complete their learning plan.
(e) A description of expected results of the curriculum and the verified methods of measuring and reporting objective results that will show the growth of knowledge of students attending the public charter school and allow	Proposal outlines in detail the expected results of the curriculum, such as student and school outcomes and goals. Plans to measure outcomes with verified methods and objective reporting are evidenced by a well- developed and comprehensive plan for assessing student and school goals. Oregon State Assessments and other means of yielding data allowing comparisons with other public schools are clearly described.
comparisons with public schools	 Preferable factors Alignment with school's mission Goals are clear, specific, measureable, ambitious and attainable Objectives follow clearly from the goals A clear plan for the school to meet AYP Clear realistic strategies for improving student achievement and closing achievement gaps Understanding of and strategy for complying with state achievement and reporting requirements
	☐ 1 Meets ☐ 4 Does Not Meet Explain rationale for rating: OAKS results at IAHS are referenced on pg. 1 of Proposal. JCCS staff have prior experience with OAKS, and the equipment and training in place.

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	Performance based assessments and individualized learning plans, leading to completion of minimum required credits, are adequately described (p 10-16, Proposal). Without a clearly articulated mission it is difficult to assess the linkage between mission and results, but one would assume that an increase in graduation rate is a goal, and individualized learning plans would support that goal.
	JCCS proposes to impart citizenship, curriculum knowledge, writing ability, critical thinking, ability to collaborate, communication, and career preparation through its combination of approaches (p 18, Proposal).
	JCCS will measure growth in multiple ways, including core content assessments and standardized assessments (OAKS, PSAT, SAT, etc, p 19, Proposal).
	Adequate formative assessment methods are provided (p 17, Proposal).
	JCCS provides an adequate description of an intended Accountability Plan (p 38, Proposal).
	The application does not "[outline] in detail the expected results of the curriculum, such as student and school outcomes and goals."
	It does not present a "well-developed and comprehensive plan for assessing student and school goals." It also does not clearly describe how JCCS will use "Oregon State Assessments and other means of yielding data allowing comparisons with other public schools are clearly described."
	At pp. 16-17 the application references an individual learning plan for each student. Discussions of how the learning plan aligns with this section's requirements may have strengthened Applicant's response. It might also have helped to include a copy of a sample plan.
	At page 19, the application states, objective assessments, such as, OAKS, PSAT, SAT, ACT, MAPS, or any other standardized assessment may be used" (emphasis added). Page 17 states, "The licensed teachers will develop course expectations directly related to the Oregon State Standards and other appropriate standards-based criteria such a College Board Standards for College Success, the Proficiency-based Admission Standards System, and any other state or nationally recognized standards" (emphasis added). A potential sponsor needs to know which standards and assessments will be used, how, and why.
	Specific examples of how JCCS would use the state school report card system or other measures to compare itself to other public schools would strengthen this section.

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	Results are mentioned as passing standardized tests, but at what rate? No goals mentioned on test scores, college matriculation rates or even graduation rates.
	Pg. 16 of the proposal. The writers of this proposal state that their students will "meet or exceed state standards prior to their graduation". What will happen prior to this 5 year goal? They have outlined a 5 step formative assessment plan – but unclear if this is a yearly plan, 5 year plan, and/or subject by subject plan (it alludes to subject goals). To have this "plan" in place, the proposal needs to formulate what the ranges of scores and requirements are for a "passing" plan. Without this, there is no basis to see what the proposal writers believe "successful" completion would be.
	No clear and measureable goals or timeline for meeting goals - found in plan. The plan states, "Improvement on performance will lead to a completion of the minimum required credits" the plan continues with "the most important result will be the success of each student fulfilling the yearly learning planthese plans will allow the staff to complement each student's learning style with a career interest."
	A 5 Step Assessment Plan was highlighted in this section with no specific details, just generalized ideas for highly qualified staff to clearly articulate in the future. (16).
	This section is very vague and unclear as to which measures the Charter will use, other than OAKS and formative assessments. The units of study along with learning targets, the aligned formative assessments and proficiency based grading system will be borrowed from K-Falls Eagle Ridge HS and the training for these will happen in the summer of 2014. No mention of interventions or staff support for struggling learners.
	In another section (pg.19) the proposal states that students will be given locator assessments in reading, math, science and social science with a posttest each semester to check for growth, but no details about what this test is or how it will relate to the formative assessments or proficiency based units.
(f) The governance structure of the public charter school	The governance structure is evidenced by assurances of non-profit and tax-exempt status and description of key features of the school's governance model.
	Preferable factors: Proposed board members will contribute a wide range of experience and expertise needed to oversee a successful charter

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	school such as education, management, financial planning and community outreach • Comprehensive plan for providing board training
	 Clear description of selection and removal procedures, term limits, meeting schedules, and powers and roles of board members Clear distinction between the roles and responsibilities of the board members and school administrators
	 Plan for meaningful involvement of parents and community members in the governance of the school Sufficient time, money and personnel allocated for planning and start-up prior to the school's opening
	2 Meets Some 3 Does Not Meet Explain rationale for rating:
	IAHS is currently a 501C-3 (p 2, Proposal). An adequate description of governing board and steering committee responsibilities is provided (p 34, Proposal).
	Proposal would be strengthened by describing a governance model.
	Proposal would be strengthened by providing a plan for board and steering committee development, for example, use of Oregon School Board's Association services, Oregon Non-profit Association services, etc.
	Proposal would be strengthened by describing the relevant expertise that each board member brings to the process of opening and managing a charter school, the methodology for selecting members, and the duties of each position.
	Proposal would be strengthened by providing adopted governance policies or a plan to develop such policies. Public Complaints (p 29, Proposal) is the only policy provided.
	Page 33 of the application states "Inn Between Inc. has been a 501C-3 non-profit organization since 1977" and that "[t]he current board will act as the governing board for the JCCS." That does not document or specifically assure that JCCS itself has or will get non-profit status.
	The key powers and duties of the governing board and steering committee need clarification. The key operating relationships between the board and committee also need clarification. For example, at pp. 33-34, the application states the "governing board will operate as the policy-making body overseeing school administration, legal, and insurance issues, while granting the steering committee sufficient authority to manage the daily operations of the school." At pp.34-35,

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	the application sets out the steering committee's responsibilities including "determining the school's educational goals, and a systematic process to evaluate the instructional program;" "measuring of student achievement against local, state and national standards;" and "staff development support, school improvement recommendations, community outreach for service learning and student internships." Draft bylaws would help provide the needed clarifications.
	It would help to know how board and steering committee members are selected, their terms of service, and how they may resign or be removed and be replaced.
	Page 34 suggests some of the board members listed there may have retired or may be retiring soon. It would help to know which members are serving and what knowledge or experiences they contribute.
	Meets minimally. Board training not addressed.
	Pg. 33 of proposal. The proposal states that the Steering Committee will manage the daily operations of the school. No governing processes have been reported in this proposal. The governing board requested that JCCS adopt all board policy of Grants Pass School District. What are these policies and how do they work for the JCCS charter school governance structure?
	Minimally meets. The plan states that they will use an existing board from the previous <i>Inn Between Alt. HS</i> that will continue as JCCS's board.
	The duties of the board and the steering committee are well defined. However the plan does not include board training, a clear description of selection, removal, term limits or plan for meaningful family /community involvement.
	The school administration is poorly defined. On pg. 36 the plan allows for ½ time director, but fails to detail roles and responsibilities of this position. Further in the plan it states, "The position for full-time teacher and director will be covered by one person."
(g) The projected enrollment to be maintained and the ages or grades to be served	Enrollment and ages/grades served is evidenced by a clear description of anticipated enrollment (by age/grade) for at least three years (and for the duration of the desired charter term, if longer than three years).
	Preferable factors
	A complete description of the student population the school intends to serve
	Evidence of strong support from an adequate number of parents,

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	or community members, or any combination thereof
	JCCS proposes to open with 45-50 grade 9-12 students (p3, 22 Proposal).
	JCCS proposes up to 450 students in 5 years.
	The budget at page 40 indicates initial enrollment of 50 students, growing to 62 by year 5. Page 4 of the application states JCCS would service students in grades 9-12. Page 4 suggests JCCS might grow to 400-450 middle and high school students, but the proposed budget does not plan for that growth.
	Meets minimally. No clear description of whether they are starting with 9-12 students or just 9 or 9/10, etc. Little mention of parent/community support.
	Unclear and conflicting numbers throughout proposal and appendix.
	Pg. 22 of proposal – 45 – 50 in the first year.
	Pg. 39 – Budget detail – By year 5: 62 students.
	<u>Appendix – Occupancy Permit</u> – up to 115 people in current Building.
	The proposal also states that they would like to grow to 450 - 500 students.
	Pg. 5 of proposal – TARGET POPULATION "Grants Pass School District was no longer going to contract with Inn Sight Alternative High School due to the loss of 300 plus students to private, non-district learning environments. These 300 plus students will be the main target population that our charter school will recruit."
	No clear idea of who these 300 students are and how they will try to "recruit" them.
	The plan states that they intend to enroll 45-50 9-12 grade students for the first 2 years. Years 3-5 are vague with a mention in one section of adding 2-5 students per year, but also they are planning on adding up to 400-450 students in grades 6-12 if the need arises.
	I found no show of support from community or parents (survey, community meetings, student enrollment commitment etc.)
	No breakdown of each grade in numbers or how the charter will add the suggested inclusion of middle school students in future years.

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
(h) The target population of students the public charter school will be designed to serve	The target population to be served is evidenced by a description of student demographics and characteristics.
	 Preferable factors Evidence that founders understand key student populations and demographics within the district which are likely to influence the proposed school's student body and needs Evidence of targeted student's current levels of achievement and instructional needs Evidence of a need in the community to serve the target student population Evidence of sufficient interest in the school to fill the proposed number of student openings
	☐ 2 Meets ☐ 3 Does Not Meet
	Explain rationale for rating: JCCS is proposed as a conversion from an existing alternative high school that has successfully served a similar population for 28 years. JCCS proposes to recruit from the 300 students who have left GPSD for private, non-district schools, with the following characteristics: desire for ownership of learning, credit deficient, need for smaller, supportive, personal environment (p 4, Proposal).
	JCCS proposed to recruit from homeless shelters, youth services, addiction programs, and from the 300 students that GPSD report having lost to private schools (p 23, Proposal).
	Budget notes (p 41) indicate Josephine County has 5000 high school students. JCCS indicates the possibility of expanding to as many as 500 students over a 5 year period. A 10% rate of at-risk students of the targeted population seems reasonable.
	Minimally meets. There is some discussion at pp. 4-5 of the application about the possible numbers and types of students JCCS proposes to target and recruit, including those who are "Credit deficient students that need a fresh start, and more importantly, someone that cares about them."
	Little description of target population with any depth.
	No firm intentions are stated and no clear understanding of the student group that they will be wanting to bring into JCCS as a majority.
	Pg. 5 of proposal – "Grants Pass School District was no longer going to contract with Inn Sight Alternative High School due to the loss of 300 plus students to private, non-district learning environments. These 300

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	plus students will be the main target population that our charter school will recruit."
	There does not seem to be clear understanding who these 300 students are – their demographics.
	Pg. 4 of the proposal does state the 4 target students (small environment, social pressure/peer issues, credit deficient students and students who would like a "family atmosphere"), but does not state how they will advertise and "recruit" for them. There is also reference to the 300 students who will not be contracted to Inn Between – are these the same students in the target areas above?
	No demographics or data included in the plan.
	The plan outlines drawing students from a pool of 300+ 9-12 grade students currently attending private non-district schools. They state that the charter is designed for high school students who need small/personal groups, are credit deficient, and students that want a family style learning environment and want to own their own learning.
	In other sections of the proposal, they state that all students will be college ready. I found no evidence of how they intend to provide a rigorous curriculum (they do say they will help students to meet minimum graduation requirements) or solid evidence (MOU) of the partnership with Rogue Community College or any other organization or workplace.
(i) A description of any distinctive learning or teaching techniques to be used in the public charter school	Distinctive learning and teaching techniques are evidenced by a detailed description of educational model(s), activities, and/or delivery strategies that will characterize the school.
	Preferable factors
	Clear, focused and compelling
	Likely to improve educational outcomes
	 Expresses a clear, guiding purpose aligned with the mission and vision
	 Supported by research, applicant experience, and/or sound reasoning behind techniques
	☐ 2 Does Not Meet Explain rationale for rating: Teachers will follow state standards and proficiency based standards, and will be flexible in instructional delivery techniques (p 17, Proposal).

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	Small group instruction is referenced and an intention of 15:1 ratio is stated (p 18, Proposal).
	JCCS intends to follow the models provided by Eagle Ridge High School and InnSight Alternative High School. Given the success of each of these programs, it is reasonable to anticipate that JCCS will be able to make effective use of these proven programs.
	Minimally meets. At pp. 17-18, the application describes these as distinctive learning or teaching techniques. Without more information, it is difficult to conclusively determine if these practices are noticeably different from those already available in other local public schools.
	"Each teacher will work with students to determine the best course of study and the nature at which the instruction is given. Not all students learn in the same manner. For this reason, our staff will be flexible in their delivery of instruction by utilizing different techniques to engage the student into learning. These different techniques may include assignments that encourage visual, listening, and hands-on learning." Example curricula, methods, materials, and assessments would clarify how those would happen in practice."
	A "maximum student/teacher ratio of 15:1." The application declares research supports that ration, but it does not list or cite any specific examples of such research.
	JCCS would require 4 years of core classes, while Grants Pass High School requires 3. The application asserts the 4-year requirement will help students retain knowledge. It does not cite supporting data or research. It is also not clear how JCCS's proposed 4-year requirement in core classes affects JCCS's diploma graduation requirements. Applicant may want to consider how, in a proficiency-based system, it could support students' use and retention of core subject knowledge without requiring 4 years of core classes.
	See earlier comments on curriculum. Distinctive learning is not well-described.
	Pg. 5 of the proposal. JCCS will be using Eagle Creek Curriculum, but there is no final and finished explanation of what that curriculum will be. There were examples of a rubric and a class plan – do the founders/board/steering committee have a solid rationale for Project Based Learning? No projects were discussed and how they would meet CCSS. The research they stated was through Eagle Creek High School, but was not detailed in this proposal.
	The charter proposal uses a heavy reliance on K-Falls Eagle Ridge HS curriculum and assessments. While no scientific research is presented, this K-Falls mentor high school has shown excellent growth for

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	students over time. The plan details how the students will be instructed within integrated learning blocks – using proficiency based learning, student / parent created learning plans with proficiency and performance outcomes.
(j) The legal address, facilities and physical location of the public charter school, if known	School's address, if known, and legal/mailing address. Preferable factors
	If a facility has been identified:
	Designation of the proposed facility
	Evidence the facility will be appropriate for the educational program of the school and adequate for the projected student enrollment
	 Adequate reflection of the costs associated with the proposed facility in the budget, including rent, utilities, and maintenance Assurance the proposed facility will be in compliance with applicable building codes, health and safety laws, and with the requirements of the American with Disabilities Act (ADA) Sound plan to identify needed renovation as well as the funds and timeline for the completion of those renovations
	If a facility has not yet been identified:
	 Description of anticipated facilities needs including evidence the facility will be appropriate for the educational program of the school and adequate for the projected student enrollment
	 Inclusion of costs associated with the anticipated facilities needs in the budget, including permits, rent, utilities, and maintenance Evidence to indicate facilities-related budget assumptions are realistic based on anticipated location, size, etc
	Assurance the proposed location will be in compliance with applicable building codes, health and safety lows, and with the requirements of the American with Disabilities Act (ADA) Output Description:
	Plan for finding a location, including a proposed schedule for doing so
	☐ 1 Does Not Meet
	Explain rationale for rating:
	Facility address is provided, as well as information regarding ownership and equity in the building. (p 4, 47 Proposal; p 27, Appendices).
	Fire Marshall's occupancy evaluation (p 8 Appendices) indicates that

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	the current building allows 115 people. It is not clear how JCCS intends to grow beyond 115 people and not acquire a larger space. The budget does not indicate a change of space (p 40, Proposal).
	The proposed location is 618 SE J Street, Grants Pass, OR 97526. Applicant does not describe the preferable factors above.
	The reviewer did not find Applicant's legal or mailing address.
	Meets minimally. Little description provided.
	Pg. 8 of Proposal Appendices. Occupancy Permit.
	Existing Inn Between Alternative HS property.
(k) A description of admission policies and application procedures	The admission policies and application procedures, including lottery procedures are evidenced by specific descriptions aligned with ORS Chapter 338.
	Preferable factors
	Clear description of the enrollment policy, including lottery procedures consistent with the requirements of ORS 338.125
	Clear procedures for withdrawals and transfers from the school that will support an orderly transition for exiting students or a clear plan for developing such procedures
	Explain rationale for rating:
	Proposal would be strengthened by use of random lottery generator software to meet equitable lottery requirement and assist with maintaining waiting lists in an equitable manner (p 22, Proposal).
	At p. 22, the application states, "Once a student is selected, there will be a mandatory orientation that will allow the staff and board members to interview each student and family to make sure that our school is the best fit for each student." That requires clarifications. Charter schools do not select students. They enroll them, subject to ages, grades, and numbers of students served, and to any necessary lottery process. What does Applicant mean by "[o]nce a student is selected"? How will JCCS respond if a student or parent does not attend the "mandatory orientation." How will JCCS's response be consistent with ORS 338.125?
	Pg. 22 of Proposal. They tread a tricky line here as they state that they will have an "interview" with the student and family called an "intake process" to see if the charter school is the

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	"best fit for each student". As long as they do not discriminate, they are meeting this obligation.
	Procedures included, however plan states that the student application helps staff to Identify if the school is the right fit for the student, this is not allowed in an Oregon Charter school. All students, homeless students, and students with limited English proficiency who reside in Oregon are eligible for enrollment in the charter school. The school should not be screening the applications for students who "fit the criteria" of the school.
(L) The statutes and rules that shall apply to the public charter school	Statutes and Rules that apply to the school are evidenced through an encompassing written statement of compliance with all laws listed as applicable to charter schools in ORS 338.115(1).
	Preferable factors
	Citation of any statutes or rules in addition to those listed in ORS 338.115 (1) and copies of policies or a timeline for policy development
	☐ 1 Does Not Meet
	Explain rationale for rating:
	JCCS demonstrates understanding of applicable statutes and rules and provides evidence that InnSight AHS has been in compliance during its operation (p 32, Proposal).
	Applicant does not provide the required "encompassing written statement of compliance with all laws listed as applicable to charter schools in ORS 338.115(1)." At page 32, Applicant asserts "Inn Between Inc., doing business as InnSight Alternative High School, currently follows all statutes and rules mandated by the State of Oregon and ODE." That asserts InnSight is in compliance with the statutes and rules governing alternative education programs. What is required here is a "an encompassing written statement" that JCCS will comply "with all laws listed as applicable to charter schools in ORS 338.115(1)."
	Pg. 32 of Proposal.
	Included
(m) The proposed budget and financial plan for the public charter school and evidence	Demonstration of a sound budget and financial plan is evidenced by documentation of a detailed three-five year budget, accurate projection of revenues and expenditures based on prevailing costs and

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
that the proposed budget and financial plan for the public	other factors that contribute to solvency.
charter school are financially	Preferable factors
sound	 Budget assumptions and financial planning based on realistic revenue and expenditure projections for the term of the contract, including based on minimum enrollment needed for solvency
	 Spending priorities aligned with the school's mission, curriculum, and plans for management, professional development, and growth
	Realistic cash flow projection for the first year of operation, including a plan for funding cash flow shortfalls
	Sound financial management systems
	 Plan for making required school and employee contributions to PERS
	Adequate and reasonable plan to manage start-up costs
	Description of how the school will conduct an annual audit of the financial operations
	☐ 1 Meets
	Explain rationale for rating:
	Intervention specialists for each common core subject and extended learning opportunities are referenced (p 6 Proposal), but no budget provided.
	JCCS states an intention of having students earn four credits, instead of the minimum required credits for Math, Science and Social Studies (p 18, Proposal), but it is not clear if they have budgeted for this additional teaching time, and its impact on the ability to provide for other required credits, i.e. electives, second language, PE, Health, etc.
	JCCS does not indicate the ability to provide HQ content teachers for all curricular areas required for graduation (i.e. second language, PE, Health, CTE). They propose to acquire those credits through the community college, but do not provide a budget for this coursework.
	5 year Budget (p 40, Proposal) should specify if the reported per student revenue is 95% or 100% of ADMw.
	5 year Budget does not specify if the 5 Foundation grants have been awarded for 5 years. According to p 29 of Appendices, these grants have not yet been applied for. I recommend not listing grants that have not been granted. This would reduce revenue in year one by \$18,000. This needs to be accounted for.
	Fire Marshall's occupancy evaluation (p 8 Appendices) indicates that

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	the current building allows 115 people. It is not clear how JCCS intends to grow beyond 115 people and not acquire a larger space. The budget does not indicate a change of space (p 40, Proposal).
	JCCS proposes 6 FTE (p 36, Proposal): 1 SS teacher, 1 Teacher/Director, 4@.75 teachers (p 46 Proposal), 1 Coordinator/Business Manager (p 28 Appendices). At the reported salary (\$134,000+26,000+32,000=\$192,000), average salary would be \$32,000 (\$192,000/6=\$32,000) (p 40, Proposal). This seems reasonable for the region.
	Budget adequately provides for salaries, taxes, PERS and benefits.
	The 5-year budget at pp. 40-41 of the application assumes 1^{st} year perpupil revenue of \$6,500. That is a reasonably accurate assumption, given the Grants Pass SD charter rate of \$6,906 as of February 28, 2014. (\$6,906 x 0.95 = \$6561 (rounded))
	However, questions such as these about specific line items need to be addressed. A budget narrative might have helped do that.
	Page numbers refer to the application.
	Operating Revenue
	What are the assumptions for the per-pupil revenue year-to-year? What information are the assumptions based on?
	What are the terms of the Carpenter, Cow Creek Foundation, and Collins Foundation grants? Are they committed exclusively to JCCS? When do the grants expire? Why are they semi-annual? Are reapplications required? If yes, what conditions would Applicant need to meet to be approved for continued funding?
	What are the assumptions for the earnings on investments? What are the investments, and what are the sources of the investment capital?
	Operating Expenses
	A full-time director is described at p. 36. Where is that position funded?
	How do the amounts for teaching salaries fully fund the 1 full and 4 part-time positions described at page 36? What are the FTE and salary increase assumptions as the amounts increase each year? A description of how this budget item funds Applicant's proposed student teacher ratio of 15:1 would help strengthen this section.
	What does ITT Tech provide for the amounts budgeted?
	The PERS line item is apparently based on Applicant's statement at p. 38 that Applicant is "going to aggressively seek qualified first year

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	teachers in order to mold them into the style of teacher that works in our environment," thereby limiting Applicant's liability because new teachers are not yet PERS vested. Does applicant intend to say that it would refuse to hire a teacher with demonstrated understanding of and success with Applicant's education program because the teacher is PERS vested?
	At page 38, Applicant also states. "Our budget reflects full PERS contribution in the years two through five. If we were to hire all of our teachers with PERS requirements during our first year, this would only increase our budget by approximately \$18,000, a 5% increase. This is a worst case scenario and we are confident that adjustments can be made to alleviate this shortfall if needed (investment monies will be used in this case)." That raises two questions: 1) if investment monies are used, how does that affect the assumed revenue from investments, and 2) if cuts to operating expenses become necessary, how and where will JCCS make those cuts? There is no line item contingency reserve in this budget.
	Why is there no contingency expense line item? Projected revenues and expenditures match. What if revenues are less than expected for any reason?
	ORS 338.145 describes Applicant's responsibilities and options to provide transportation for students who reside in the district and attend JCCS. At p. 41, Applicant states, "The JCCS will continue to utilize the Grants Pass School District #7's transportation services as we have in the past. For transportation, we are unaware of any costs or revenue that would directly affect our budget." JCCS has not utilized the district's transportation services because JCCS doesn't exist yet. What are the assumptions for Applicant's \$2,500 line item the first year and gradual annual increases for "Transportation/Field Trips"?
	There is a line item for "Mortgage Interest/Principal." What are the terms of the mortgage? Are any of JCCS's founders or board or steering committee members personal guarantors? Who or what entity holds the mortgage? Is the mortgage current? Are there any past due payments or accrued interest or other penalties? Is the mortgage on the proposed school site at 618 SE J Street in Grants Pass?
	What are the assumptions for the line items for "Maintenance/Repairs" and "Renovations"?
	At p. 47 Applicant states "In the past, we, here at InnSight Alternative High School, have paid a \$100 fee to OSAA to allow our students to compete in OSAA athletics with their home base school." If JCCS continues that tradition, how are the costs included in the proposed

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	budget?
	At page 48, Applicant states, "As a part of our steering committee, we will have access to counseling through the local counseling services of ADAPT. All other counseling will be done in-house, by the staff, school coordinator, or director." It is not clear how much ADAPT services cost or how those costs are included in the proposed budget.
	At p. 41, the application mentions a "five hundred student cap." That is not relevant for budgeting purposes, given the enrollments and perpupil revenues projected at p.40.
	Meets minimally. I have concern though about the staffing, the pay being offered (\$31,000 for .75FTE), the school's reliance on not full-time teachers, and the school's plan to find first year teachers so they can avoid PERS initially.
	Pg. 41 of the proposal – Five year operational budget.
	Areas of great concern:
	1. Hiring "new" teachers to avoid PERS.
	2. Food Program – under budgeted if offering lunches to students.
	3. I.T. Budget – they have only 15 computers – with high School students they need a plan for hardware costs in the coming 5 years. The I.T. costs for the year – for support – were very low.
	4. Paying teachers \$31,000 to "create" the school.
	5. Full time teacher and director are the same person for 5 years? Not clear.
	6. Accounting –They are hiring a CPA to do monthly financials, they also are hiring a bookkeeper for the office and will need to do yearly municipal audits. The money budgeted is not enough to cover all of the needs stated in the proposal.
	7. Fringe Benefits are what? Sick leave?
	8. Inconsistencies throughout the proposal on how many students and how many teachers are needed. Not a clear – well thought through staff plan (stated that they wish to grow to 450 – 500 – what is the staff plan for this?)
	Heavy reliance on foundation dollars. \$18,000 the first year is this already in place?
	Enrollment projections for 5 yr. plan in this section call for a 12 student increase over the 5 year period, however in other parts of the plan there are projections of an increase of 400-450 students in grades 6-12 if the need arises. This is confusing and no documentation is included

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	for this element of the plan.
(n) A description of the financial management system for the public charter school, an explanation of how the financial management system will meet the requirements of ORS 338.095 (1) and a plan for having the financial management system in place at	The financial management systems are evidenced by documentation of board and staff management responsibilities, fiscal policies, budget development and oversight system, creating and using budgets, balance sheets reflecting assets, expenditures and liabilities, accounting systems, payroll, insurance and benefits, financial reporting, internal controls (staffing policies and procedures), the audit (understanding, conducting and preparing for an audit and using 990s. *Preferable factors*
the time the school begins operating;	 Clear description of the financial responsibilities of the charter board as it compares to the staff responsibilities
	A check and balance system described for budget development and the oversight system during the budget year
	 Board policies describing the internal controls for receiving revenue and paying bills
	 Clear operating standards for financial management with a consistent foundation, institutionalized practice in the event of leadership or staff turnover
	Processes reflecting annual review of such systems by both the public charter school and sponsor
	☐ 2 Meets ☐ 3 Does Not Meet
	Explain rationale for rating:
	The Proposal fails to describe the qualifications of a financial manager. Currently these duties are assigned to a "School coordinator", who will also function as office manager, bookkeeper, teacher assistant, and any other duties (p 36, Proposal). This seems an unrealistic combination of skills, and does not specify a financial skill set.
	JCCS provides evidence of established practice of board oversight of monthly financial statements (p 37, Proposal).
	JCCS provides evidence of Financial management systems for reporting and cash flow management (p 37, Proposal).
	JCCS indicates a successful record of revenue tracking and audit performance (p 37, Proposal).
	Proposal would be strengthened by providing board policies describing internal controls.
	At pp. 37-38 the application describes how Inn Between Incorporated

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	has structured and managed its finances. At p. 39 Applicant asserts JCCS "will comply with all district, state, and federal accounting requirements." The application does not provide a "description of the financial management system for [JCCS], an explanation of how the financial management system will meet the requirements of ORS 338.095 (1) and a plan for having the financial management system in place at the time the school begins operating."
	Meets minimally. Few of the preferable factors present.
	Pg. 36 of Proposal. This is a brief overview of the revenue but not a clear outline of checks and balances. The discussion in the proposal on page 36, covers checks over \$250.00 and deposit slips. This is not an adequate discussion to assume that there is a firm understanding of checks and balances, between the onsite bookkeeper and the CPA that they are using.
	No clear details – basically the plan states that they have been conducting an Alternative HS for years and rely on a CPA to track funding and produce statements for the board to review each month.
	Checks over \$250 are signed by 2 people and monies received are deposited on the same day as received.
	The plan is missing staff policies and procedures in plan. There are no processes reflecting annual review by charter and sponsor.
(o) The standards for behavior and the procedures for the discipline, suspension or expulsion of students	Clear description of standards for student behavior and accompanying discipline procedures, which include suspension and expulsion procedures.
·	Preferable factors
	 Policies for addressing expulsion, suspension and education of expelled or suspended students providing adequate safety of students and staff; provide due process for students; serve the best interest of the school's students; create a positive environment for learning
	 OR A description of student standards for behavior
	 A description of student standards for behavior A clear plan for developing such policies including a schedule for doing so
	An explanation of how the proposed school will conduct appeals for students facing expulsion
	A description of how students will be expelled, for what offenses and which schools they will be expelled from if the expulsion

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	hearing is conducted by the proposed charter school
	Explain rationale for rating: Description is provided of behavioral expectations and suspendable offenses, and a limited expulsion process (p 23-26, Proposal); however, the Proposal would be strengthened by a plan for developing policies, and a more detailed description of suspension and expulsion procedures, that includes the management of appeals and due process.
	JCCS proposes to adopt the sponsor's board policies and administrative regulations (p 35, Proposal). This will most likely be incongruent with the approaches that will be used with out-of-school youth, and the stated JCCS goals of a supportive and relationship-based approach to behavior management.
	The Proposal would be strengthened by providing policies that will support a behavior management program that is tailored to the target population.
	Minimally meets. The application provides much helpful detail at pp. 23-29. Expulsion is discussed at p. 25. However, it is not clear why JCCS would expel a student. At p. 25 the application also states JCCS may recommend placing an expelled student in "another educational setting," but "As a charter school, there will be no placement options as the sponsor district has the ultimate decision on their students' placement. We will give the district our recommendation, but the final decision will have to come from the home school district of each student that is expelled." The reasons given at the top of p. 25 for placement in "another educational setting" appear to be taken from laws and rules governing alternative education programs. A sponsor should require JCCS to clarify its reasons and process for any expulsions.
	Adequate standards provided.
	Pg. 25 of the proposal. Outlines suspension and expulsion procedures.
	Included
(p) The proposed school calendar for the public charter school including length of school day and school year	The school calendar is evidenced by a description or calendaring of school days; the length of the school year and the length of a school day that meet the instructional time requirements in OAR 581-022-1620.
	Preferable factors

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	School day and school calendar are structured in ways that align with the educational program
	Explain rationale for rating: Mirrors that of GPSD and GPHS (p 19, Proposal).
	Without more information it is not possible to determine if Applicant's school year and day meet the instructional time requirements in OAR 581-022-1620 for students in grades 9-12.
	Following calendar of local district.
	Pg. 18 of the proposal. JCCS will be using the Grants Pass High School Calendar.
	The calendar is to be aligned with area school district calendar. I see a problem with instructional hours. If core block instruction is from 9am – 11:30 and 12:20 – 2:55 then only 5.05 hours of instruction are accounted for. If the charter follows Grants Pass instructional calendar - as indicated - this allows for 171 days of instruction which = only 863.55 hours of instruction – 126.45 hours <u>short</u> of the 990 hours of required instructional time for 9-12 grade students. (20)
(q) A description of the proposed staff members and required qualifications of teachers at the public charter school	All proposed staff positions and qualifications are described. Preferable factors Explanation of the relationship that will exist between the charter school and its employees Employment policies of the school OR clear plan for timely development of such policies Plans for ensuring all staff meet ESEA Highly Qualified Teachers requirements Staffing plan that clearly describes qualification, roles and responsibilities of each staff member, including school administrator Description of ongoing professional development for staff, aligned to school's mission Meets 2 Does Not Meet
	Explain rationale for rating: Describes the contractual relationship between the charter and employees (p 36, Proposal).

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	JCCS states that teachers will not be represented by any collective bargaining unit. This is incorrect. ORS 338.135(8) allows charter employees to be a member of a labor union or to bargain collectively.
	Does not evidence HR policy development or Faculty Handbook, etc These types of foundational pieces should be in place prior to opening a charter school.
	JCCS states that <u>all teachers</u> will be licensed and registered (p 36, Proposal), leaving me unsure if they understand the distinction between licensed and registered. This is concerning in that if the founders fail to understand that up to half of the teachers are not required to be licensed, thereby failing to take advantage of the flexibility afforded charter schools, and perhaps inadvertently mitigating their capacity to be innovative.
	Indicates an understanding of HQ requirements (p 36, Proposal). Does not provide evidence that HQ candidates have been identified.
	Intervention specialists for each common core subject and extended learning opportunities are referenced (p 6, Proposal), but are not described under the description of employees (p 36, Proposal).
	JCCS does not indicate the ability to provide content or HQ teachers for all curricular areas required for graduation (i.e. second language, PE, Health, CTE).
	P. 36 describes the proposed staff members. The Application makes numerous commitments to hiring only highly qualified teachers. However, the application does not clearly describe the preferable factors above.
	A potential sponsor should require answers to these questions.
	How will the proposed staffing deliver instruction in the electives required for students to earn a diploma?
	At page 48, Applicant states, "As a part of our steering committee, we will have access to counseling through the local counseling services of ADAPT. All other counseling will be done in-house, by the staff, school coordinator, or director." Given Applicant intends to hire inexperienced first-year teachers, how will they qualify to deliver counseling services?
	Positions minimally described (on administration side). Qualifications for administrative staff not described.
	Pg. 36 of proposal – for the first "3 years" they detail what FTE they will hire. JCCS is hoping to find all Highly Qualified Teachers, and have budgeted for all new teachers. They also have stated that Eagle Ridge Charter School will provide curriculum planning – but there is no

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	mention of how much/when/how/who will train. Staff development is written into the budget, but it is not clear what will occur with the staff to train and develop the expertise needed for this population of At – Risk students that this charter seeks.
	The plan calls for all HQ staff to be hired in the areas of ELA, Math, Science, Social Sciences and Fine Arts.
	No mention of second language teacher at this time.
	No mention of relationship with employees or policies.
	No plan for HQ status or roles and responsibilities of staff and administrator.
	No mention of professional development other than working with the K-Falls Eagle Ridge HS staff to learn program and assessment/grading system.
(r) The date upon which the public charter school would begin operating	The operational date is evidenced by a clear statement of projected start date. Preferable factors A description of the process for opening the school on the projected start date A timeline outlining the significant items needed to open the school by the projected date. 5 Meets Dooes Not Meet
	Explain rationale for rating:
	Projected opening date: Aug/Sep 2014 (p. 3 Proposal). Given this is an application for state board sponsorship, the actual opening date is subject to board policies and negotiation of a charter agreement.
	Meets minimally. Much seems to be assumed since they are converting an existing school.
	Pg. 3 of Proposal.
	School to open September 2014
(s) The arrangements for any necessary special education and related services provided pursuant to ORS 338.165 for	The arrangements for special education and related services are evidenced in a comprehensive description which aligns with ORS 338.165.

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
children with disabilities who may attend the public charter school	 Preferable factors Realistic plan to identify and meet the general education learning needs of, resident and non-resident students with disabilities Timeline, lead contact, and intervention process with specific action steps for meeting learning needs of students with suspected special needs Plans for serving special populations align with the overall curriculum, instructional approaches, and the school mission Plan for contracting with resident districts for providing Identification and IEP services for students with suspected or special needs.
	Explain rationale for rating: JCCS states an intention to comply with sponsor district in supporting the provision of IDEA services (p 21, Proposal).
	Proposal would be strengthened by presenting an understanding of its responsibilities regarding the provision of learning interventions, the identification process, how mandated services will align with the curriculum model of JCCS, and the staff development necessary to support IDEA services.
	See p. 21.
	Meets minimally.
	Pg 20 of proposal. Grants Pass School District will provide services to JCCS.
	The plan details how the school will provide services for children with disabilities by working collaboratively with the student's school district on a yearly basis.
(t) Information on the manner in which community groups may be involved in the planning and development process of the public charter school	Plans to involve the community in the planning and development of the public charter school are described in detail (e.g., identification of key community groups or members the developers will access given the school's mission and target population, tactics to engage key community constituents, the process of how community input will be sought, etc.).
	Preferable factors Sound outreach plan to inform parent and members of the community about the operations of the school, including providing information about the school to students of all races, languages,

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	 and abilities, a timeline for implementation, a lead contact, and specific action steps Evidence the proposed school is welcomed by the larger community, has formed partnerships with community organizations, and is viewed as an attractive educational alternative that reflects the community's needs and interests
	☐ 1 Meets ☐ 4 Does Not Meet
	Explain rationale for rating:
	JCCS has developed what appears to be a beneficial and solid partnership with Eagle Ridge High School (p 6); however, no other community partnerships are identified. (p 33). There is mention of using a community college for courses but no evidence that there is a definitive plan in place or an agreed upon partnership.
	Proposal would be strengthened by evidence of community partnerships (higher education, juvenile justice system, youth crisis programs, homeless shelters, etc)
	Minimal information is provided to include community members in the planning and development of the charter school. (p 33)
	There is no evidence of an outreach plan which encompasses race, language, or ability.
	The application describes community participation with groups such as Eagle Ridge School (p. 6); ADAPT counseling services (p. 48); and groups represented by board and steering committee members (pp.33-35).
	No description of community involvement in development of school or in its ongoing growth and development apart from Board.
	Pg. 35 of the proposal. Great idea to have a steering committee with community members, but the relationship between the committee and the school is not clear. They state that this steering committee will run the day to day operations of the school. What is the need for a director?
	Outreach is not detailed. They will need a clear target for outreach – how will they promote the school, as well as, market the school to prospective students? No plans in place that I could find for this specific type of community outreach.
	The plan does not include the aggregate number of students interested in the charter school at different grades or a table with the different grade levels and the total number of students interested in each grade

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	level.
	The proposal does not define the process of how stakeholders were involved in the planning process.
	The plan states that once the charter is approved, a stakeholder subcommittee will be formed within the staff, governing body, and at least one parent (or if not available a staff member or community member will step in) to encourage at-risk and underserved students to apply (no mention of input or design of the project).
	The plan states that the charter will make itself accountable to students, parents, and community through routine surveys and reports of progress.
	No letters of support from community leaders, business people or elected officials are included in proposal.
(u) The term of the charter	The term of the charter is evidenced by a proposed beginning and ending date for the charter contract; proposed term must be a minimum of one year and maximum of five years.
	Explain rationale for rating:
	5 years, beginning Aug/Sep 2014 (p 3 Proposal
	Applicant proposes a 5-year term. See p. 4 and the budget.
	Proposing 5 years.
	Pg. 4 of proposal
(v) The plan for performance bonding or insuring the public charter school, including buildings and liabilities	The insurance plan is evidenced through a description of the types and levels of insurance coverage the school plans to purchase or a description of the plan to secure performance bonding. Preferable factors • Budget reflects insurance costs
	Explain rationale for rating:
	JCCS states that InnSight AHS has been in compliance with insurance requirements (p 32, Proposal) and provides Summary of Insurance (p 4-6, Appendices).

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	Budget reflects insurance costs for property and liability (p 41, Proposal).
	At p. 33, Applicant states, "The Inn Between Inc. is in full compliance regarding commercial insurance and D&O insurance. This has already been a mandate for our corporation as we are already an educational entity. All insurance coverage is listed on the summary provided." The appendices include information about insurance coverage dated in 2013. A potential sponsor should require evidence that JCCS is or will be adequately insured prior to opening.
	Insurance information provided and budgeted for.
	Pg. 4 -6 JCCS Proposal Appendices. Insurance Policy included.
(w) A proposed plan for the placement of public charter school teachers, other school employees and students of the public charter school upon	The plan for placement of staff and students (in the event of non-renewal or termination) is evidenced through a written description of the process to be used; student plans should include collaboration with the local school district.
termination or non-renewal of a	
charter	Explain rationale for rating:
	JCCS does not provide evidence of a plan for placement of staff, and states that they will not have placement options within the school district (p 36). This appears to imply that staff cannot be hired in the district, which is inaccurate. Such wording, and the lack of forethought and planning for possible termination and the care of employees, is concerning.
	Does not specify a plan for the placement of students (p 36).
	There is a plan at p. 36 for the placement of students.
	However, at p. 36, the application states, "All teachers and administrators will be hired on independent contracts separate from the local school district. In the event of the charter school being terminated, teacher contracts will be dissolved with no placement options within the local district. Teachers will not be represented by any unions or any local collective bargaining agreement. Classified employees will not be entitled to membership in any local classified union of any kind. If the charter school is terminated, or not given a renewal, all teaching and classified positions will no longer exist and there will be no placement options within the local district." There is no plan or process. In addition, a potential sponsor should determine, to its satisfaction, if Applicant's statements about collective bargaining and representation are consistent with state and federal labor laws.

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
	Provided.
	Pg. 36 of the proposal.
	All staff will be hired as independent contractors.
(x) The manner in which the program review and fiscal audit will be conducted	The plans for annual review of educational program and operations, and municipal fiscal audits will be evidenced in a detailed description of how both will be accomplished
	 Preferable factors The process and timeline for arranging the annual fiscal audit The process and timeline for a sponsor site visit The manner in which fiscal audit and program review results will be incorporated into school improvement planning The plan and timeline to submit audit and annual program review to ODE
	JCCS provides a plan for annual review of program and fiscal audit (p 37-39, Proposal).
	See p. 39.
	Both audit plans and program review plans provided.
	Pg. 39 of proposal. They do state that the "accountability plan" will be devised by the Governing board.
	Details of how the charter will work with sponsor toward meeting academic and fiscal goals is detailed on page 38 of proposal.
(y) In the case of an existing school being converted to charter status:	(A) Alternative arrangements for staff or students who choose not to be in the public charter school is evidenced by a detailed plan that addresses the needs of each group and does not create an adverse impact or violate the rights of an individual.
(A) The alternative arrangements for students who choose not to attend the public charter school and for teachers	☐ Meets ☐ Does Not Meet Explain rationale for rating:

Proposal Requirements ORS 338.045 (2)	Evidence, Preferable Factors, Rating and Rationale
and other school employees who choose not to participate in the public charter school; and	NA
(B) The relationship that will exist between the public charter school and its employees, including evidence	(B) Description of the relationship between the public charter school and its employees, should they choose to remain at the school once converted to charter, with evidence that all employment terms and conditions have been addressed.
that the terms and conditions of employment have been addressed with affected employees and their recognized representatives, if any.	Explain rationale for rating: NA

Oregon State Board of Education Charter School Proposal Review and Analysis Rubric

Evaluation Criteria ORS 338.055(2)	Evidence, Preferable Factors, Rating and Rationale
(a) The demonstrated, sustainable support for the public charter school by teachers, parents, students and other community members, including comments received at	Demonstration of sustainable support is evidenced by substantial documentation, e.g., market research, marketing plans, results of community meetings/presentations, community partnerships, and/or survey results, as well as documentation of community testimony provided during the public hearing conducted by the school district.
the public hearing held under subsection (1) of this section	☐ 0 Meets ☐ 5 Does Not Meet
subsection (1) or this section	Explain rationale for rating:
	There is no evidence provided that there is community support for the proposed program.
	JCCS claims that IAHS has maintained an enrollment of 30 students annually (p 2, Proposal); however, no evidence is provided that they will be able to achieve the projected enrollment of 50-60 students annually (p 39, Proposal).
	The application does not provide substantial, objective, numeric evidence of sustainable support for JCCS such as survey results, letters of commitment from parents or guardians, or public testimony. The application does present a plan to market JCCS, but that does not provide documentation showing the "demonstrated sustainable support" required by this section.
	No market research provided, nor mention of community meetings. Little evidence provided of community buy-in to the program outside the evidence provided by existence of Inn Sight Alternative High School.
	The proposal does not show sustainable support by the community There was no evidence of public meetings to show interest from the public in JCCS. There was not discussion of how they would "recruit" students, and it was unclear exactly which target population they would be seeking.
	Plan indicates relationships with community college, local businesses and Boys and Girls Club, but no documentation, letters of support or MOU included.
	No market research, community meetings or community support included in proposal.

Evaluation Criteria ORS 338.055(2)	Evidence, Preferable Factors, Rating and Rationale
	No parent letters of support or indication of community/parent survey submitted.
(b) The demonstrated financial stability of the public charter school, including the demonstrated ability of the school to have a sound financial management system that is in place at the time the school begins operating and that meets the requirements of ORS 338.095 (1);	Demonstration of a fiscal stability is evidenced by documentation of a detailed three-five year budget, balance sheets reflecting assets, expenditures and liabilities, accurate projections of revenues and expenditures based on prevailing costs and other factors that contribute to solvency, as well as GAAP and other sound fiscal management practices. Preferable factors
	 Annual reserve, minimal reliance on soft funds Sound financial management policies and strategies including but not limited to cash management, investment practices, financial reporting, segregation of duties, and processes reflecting annual review of such systems.
	☐ 0 Meets
	Explain rationale for rating:
	Evidence is provided of sound fiscal management practices.
	JCCS fails to describe the qualifications of a financial manager.
	JCCS does not provide a budget for items proposed for its program: intervention specialists, extended learning opportunities, core content courses beyond graduation requirements, HQ teachers for all required coursework, or a budget for paying for courses at a community college
	JCCS does not state if the grants included in the budget are secured
	JCCS does not provide a plan or budget for securing more space should enrollment outpace its current building
	See the discussions in ORS 338.045(2)(m)-(n) above.
	Five year budget provided. However, reliance on first year teachers is critical. Also, no assurance of grants mentioned being received. No reserve in budget.
	Limited budget consistency in the numbers of students. Computer hardware costs were not evidenced in the budget for the coming 5 years. There was a limited discussion of financial management policies

Evaluation Criteria ORS 338.055(2)	Evidence, Preferable Factors, Rating and Rationale
	for the business office duties and CPA involvement.
	Reliance on foundation grants in first year of \$18,000. No letters or support or proof of grant funding in proposal.
	Proposal indicates that if enrollment is not reached, the charter can borrow against equity in property or liquidate investment funds, this is not sustainable.
	Much of the fiscal responsibilities are left to the CPA with no details of how the director will be responsible for financial management.
(c) The capability of the applicant, in terms of support and planning, to provide comprehensive instructional programs to students pursuant to an approved proposal	Evidence of the applicant's capacity to support, plan and provide comprehensive instructional programs, including relevant expertise and experience of the applicant, a proposed comprehensive curriculum aligned with state standards and based on research-based instructional practices, adaptable for all achievement levels.
	Preferable factors
	Effective staffing, professional development
	 Assessment plans that support effective delivery and measurement of the instructional program.
	☐ 1 Meets ☐ 4 Does Not Meet
	Explain rationale for rating: Given the partnership with Eagle Ridge High School and the existence of InnSight Alternative High School for 28 years, JCCS has provided sufficient evidence of the ability to provide a comprehensive instructional program
	See the discussions at ORS 338.045(2)(d)-(e) above.
	Evidence of research-based practices lacking.
	Limited budget consistency in the numbers of students. Computer hardware costs were not evidenced in the budget for the coming 5 years. There was a limited discussion of financial management policies for the business office duties and CPA involvement.
	Plan relies on HS in Klamath Falls for training and program guides for professional development needs as well as curriculum.
	The proposal includes an example from K-Falls Eagle Ridge HS

Evaluation Criteria ORS 338.055(2)	Evidence, Preferable Factors, Rating and Rationale
	curriculum of Proficiency Based unit in American Studies and World Studies with no connection to the needs of the Grants Pass area students, the demographics of target student populations or a need in the community for this type of HS.
	The assessments for baseline data and charting progress are vague and unclear.
	The formative assessments and integrated units of study outlined in this proposal have been developed by a HS in Klamath Falls and may not be accessible or easily understood by first year teachers as the plan states. Due to the distance between the schools, <i>just in time support</i> seems unlikely.
	The proposal details how students will follow a yearly learning plan, but does not clearly define how students furthest from the standard will receive additional time and resources to meet standards.
(d) The capability of the applicant, in terms of support and planning, to specifically provide, pursuant to an approved proposal, comprehensive instructional programs to students identified by the applicant as	Evidence of the applicant's capability to support, plan, and provide comprehensive instructional programs that will meet the needs of academically low achieving students is evidenced by a plan for identifying low achieving students, specific program planning/implementation to close anticipated achievement gaps and assessment plans to measure individual progress.
academically low achieving	
	Explain rationale for rating: JCCS describes an instructional model that utilizes proficiency based learning, multiple avenues for demonstrating proficiency, regular embedded formative assessments, and a relationship based model that appears well designed to meet individual student needs
	See the discussion above at ORS 338.045(2)(d).
	Minimally provided. Mention is made of assessment of students upon entry and careful planning to fill in gaps, but no specifics provided.
	Applicant has a detailed knowledge of individualized plan for students (low achieving) to measure individual progress. The steps were detailed in the proposal.
	Evidence of the applicant's capability to support, plan, and provide

Evaluation Criteria ORS 338.055(2)	Evidence, Preferable Factors, Rating and Rationale
	comprehensive instructional programs are not addressed in plan. The plan states that the HQ staff will implement assessments and units of study appropriate for each student as outlined in the student's learning plan.
	Each student and parent are responsible for meeting these learning plan goals - and the staff are responsible for creating a learning environment for students to access units of study.
	There is no comprehensive course program developed at this time, only the promise that teachers will develop units of study after working with the Eagle Ridge HS staff during the summer of 2014.
	No mention is made of interventions or support for students furthest from meeting the standard.
	The proposal states, "Improvement on performance will lead to a completion of the <i>minimum</i> required credits" the plan continues with "the most important result will be the success of each student fulfilling the yearly learning planthese plans will allow the staff to complement each student's learning style with a career interest."
(e) The extent to which the proposal addresses the information required in ORS	Evidence that the proposal addresses the information required in ORS 338.045 to a satisfactory extent.
338.045	☐ 0 Meets
	Explain rationale for rating: On the whole, JCCS has not sufficiently met the requirements of ORS 338.045, with the notable deficits in: 1) an acceptable mission statement, 2) a budget that provides for all programmatic elements, 3) lack of evidence of community support, 4) lack of evidence of understanding of directors' conduct requirements and liabilities, 5) lack of evidence or a plan for the development of critical foundational policies (student conduct, board governance, HR).
	See the sections above rated Does Not Meet: ORS 338.045(2)(a), (d)-(f), (j)-(n), (p), (w).
	Insufficient explanation of the research-backed instructional strategies and curricular plan. Also, insufficient description of the community support/input into the plan for JCCS.
	Curriculum, Finances and professional development are the most

Evaluation Criteria ORS 338.055(2)	Evidence, Preferable Factors, Rating and Rationale
	concerning to meeting the minimum requirements.
	See above
(f) Whether the value of the public charter school is outweighed by any directly identifiable, significant and adverse impact on the quality of the public education of students residing in the school district in which the public	Evidence from the proposal demonstrates the value of the public charter school. Evidence from the school district response demonstrates an explicitly identifiable, significant and adverse impact on the quality of education of students within the district. (A "Meets" score signifies there is NO adverse impact)
charter school will be located	2 Meets S Does Not Meet
	Explain rationale of rating: Value-
	Given the dissolution of IAHS, and its historical enrollment of 30 students, there would appear to be a need for a program to meet the needs of at risk youth.
	The application suggests JCCS's potential value is in serving the target population described at p. 4.
	Insufficient information to demonstrate the school's value to community and students targeted. While I don't doubt that there is a need for this type of school, planners did not provide compelling evidence.
	HS continues to offer alternative school setting for students wanting to minimally meet standards.
	Potential to offer project / proficiency- based units of study to students who thrive in small group situations.
	Adverse Impact-
	GPSD does not provide evidence of adverse impact.
	The last decision notice from the Grants Pass School District does not address or assert any adverse impact.
	District did not claim adverse impact.
	Not clear on Low achieving students and how they will be the target population. Community impact/need and interest is not explored or

Evaluation Criteria ORS 338.055(2)	Evidence, Preferable Factors, Rating and Rationale
	discussed.
	School has not extended focus into the community and is not truly aware of enrollment need.
	Proposal states that 1 st year teachers are more economical, but may not possess the skills needed to adopt another school's curriculum and assessments to adequately create, instruct and assess 9-12 students in a project/performance based system.
	No mention of PLC meetings or other staff supports needed for instructing students that may need interventions and additional supports to be successful.
	Plan tends to focus on students that it may have focused on in the past (neglected, delinquent and parenting youth), fails to look at the population as a whole.
(g) Whether there are arrangements for any necessary special education and related services for children with disabilities pursuant to ORS 338.165	Evidence of arrangements for necessary special education and related services for children with disabilities include detailed plans aligned with ORS 338.165, i.e., recognition that student resident districts to retain responsibility for providing all special education and related services, plans for charter school to contract with sponsor district and other districts for payment of ADMw for special education students and specifying respective responsibilities related to the provision of special education and related services to the student.
	 Preferable factors Professional development for charter school staff related to identification and referral, modifications and accommodations, discipline, attendance reporting, communication with parents, and charter school's role on IEP team.
	charter school's responsibilities in the provision of mandates services.
	See p. 21 of the application.
	Meets minimally. No preferable factors.
	Proposal demonstrates the ability to support IEP instruction with

Evaluation Criteria ORS 338.055(2)	Evidence, Preferable Factors, Rating and Rationale
	Grants Pass School District holding the IEP responsibility.
	The proposal is clear and comprehensive in this area.
(h) Whether there are alternative arrangements for students and for teachers and other school employees who choose not to attend or who choose not to be employed by the public charter school	Applicable to conversion schools only Alternative arrangements for staff or students who choose not to be in the public charter school is evidenced by a detailed plan that addresses the needs of each group and does not create an adverse impact or violate the rights of an individual. Meets