

Carolyn Shearman, Chair
Public Education Commission (PEC) members % Linda Olivas
Charter School Division
300 Don Gaspar Ave.
Santa Fe, NM 87501

Dear Madame Chair and Members of the PEC,

The vision of Six Directions Indigenous School is to create an exemplar school in Gallup committed to excellence, equity, and relevance for Native American youth in response to a history of public education that has failed to offer such a school option. Our mission is crafted around three important student outcomes: academic preparation for post-secondary options, holistic well-being, and civic involvement. We envision a school that actively engages its community, and that nurtures students in a safe and academically rigorous environment so that they may thrive in their lives during and especially after high school. The research and anecdotal evidence behind models of culturally responsive schooling, behind rigorous project-based learning, and behind positive youth development frameworks are all compelling, and are exactly the kinds of innovative practices that our students deserve.

For over a century, public school systems in Northwest New Mexico have failed Native students. In 2013, the percentage of Native high school graduates in New Mexico who showed a college-ready ACT score was 10%-- compared to 22% of Hispanic and 50% of white youth. In 2014, in schools in the city of Gallup, white youth scored proficient or advanced on state tests at a rate more than double that of Native youth, about 60% compared to 25%. Last year, each of the middle schools in Gallup received a D grade, and each of the high schools a C grade. While we do not purport that there is a simple analysis of the problems, or any singular solution, we believe that responsiveness and innovation is long overdue; our students have waited long enough. Evidence shows that culturally responsive schooling models can and do improve academic achievement as measured by standardized tests while also improving attendance and graduation rates. Besides a lack of transparency in changes to the application scoring process, the staff evaluation from the Charter Schools Division does not fairly assess our capacity to engage community (addressed in the **Appendix** of this letter), the quality of our application, or the history of education and the impact our school can make in our community. We know that our idea is important for our community and that with the support of the NACA-Inspired Schools Network and the National Indian Youth Leadership Project, combined with a broad coalition of community support, we are on track to excel in our planning year and to successfully open the school in summer 2016. We are grateful for the opportunity to provide you this letter to further demonstrate our capacity and readiness to establish a high-quality charter school.

Special Populations

SDIS will provide an excellent continuum of services to all of our students with special needs, whether through the special education process, 504 process, or ELL process. CSD feedback indicates that while SDIS understands legal requirements and names basic structures for the provision of services, we did not offer sufficient detail about our plans. Until we have enrolled students, some levels of specificity in our plans and services for special education can be difficult to make. However, SDIS is committed to providing accommodations, modifications, and services that are in compliance with each student's IEP goals and research based strategies, and will evaluate the impact of the services in alignment with the expectations of Special Education Law and Guidelines.

As referenced in our application on **pages 42** and again on **page 44** (of the SDIS Preliminary Analysis Charter Application), with regard to Tier 3 students with IEPs, their prescribed services will be provided and monitored by dual-certified staff (secondary education and special education) in the classroom settings. This means that IEP students can be intentionally placed in a skills lab with a dual-certified staff member who provides

accommodations and/or modifications in a small-group setting for up to 1.5 hours per day. During project-based learning sections of the day, dual-certified staff can co-teach or push-in to work with individual students or small groups. Mentoring or other specialized tier 3 course work can be provided in place of an elective by a dual-certified staff member. For any specialized needs like occupational therapy or speech therapy, students will be provided ancillary staff members. Any dual-certified staff who own an IEP caseload will be responsible for monitoring the implementation of the IEP and the progress of the student. Weekly meetings with IEP teams for the purpose of progress monitoring will occur during the 8-9 am teacher collaboration hour during which time progress towards goals will be evaluated and plans for that student can be critiqued and adjusted.

Six Directions staff and IEP teams will work in collaboration to develop and implement the most appropriate program of study for graduation as determined by the needs of each student and the level of disability and support needed (Preliminary Analysis Charter Application, **pp. 45-46**). The IEP team will be responsible for creating a Next Step Plan and Transition Plan for each student. The plans will be aligned with the yearly goals established in the IEP and will serve as a guide for each student in assessing their career and academic goals. The IEP team will evaluate annually the necessary steps and supports required for the student to achieve success in the selected career path. Based on the recommendations and goals of the IEP, an appropriate course of study will be selected for each student to achieve their short and long term goals. It is the responsibility of the case manager and IEP to establish outside connections that could provide support as they transition beyond high school. Some of the outside agencies may be Division of Vocational Rehabilitation (DVR) and the Special Services Division at the universities. The Next Step Plans and the Transition Plans will be developed in accordance with IDEA federal and state regulations.

Six Directions will provide ancillary support and services to students according to their IEP and/or recommendations of the evaluations conducted by contracted licensed ancillary staff. The following will illustrate the required steps necessary to provide ancillary support: Prior to the opening of Six Directions, the Executive Director will contact agencies that provide contract ancillary service providers to determine cost for Diagnostic services, Speech & Language Pathologists, Occupational Therapists, Physical Therapists, Social Work services, and Psychological services. The quotes should include hourly rate, travel time, per diem, and evaluation costs. An MOU will be developed with the agency (for example, CES, as mentioned in Preliminary Analysis Charter Application, **p. 46**) if this is the best option. The Head Administrator (or the Executive Director, depending on when the Head Administrator is hired) will view IEPs of incoming students prior to the school year to determine services required to meet the individual needs to the students. By so doing, SDIS can insure that services are procured and will begin when school starts. Consistent communication with contracted agency/partnership is crucial to ensure the required personnel are in place.

For monitoring section 504 plans, all school staff will be apprised of student needs; specifically those students identified as having major physical or mental impairments, and cultivate individualized and appropriate plans to fully address the various needs in regards to health, safety, and equitable access to school environments. Progress and success of students with Section 504 Plans will be monitored as often as progress of the general education population is monitored. The team will also include data from the ancillary staff (if applicable). Periodic re-evaluation is required. This may be conducted in accordance with the IDEA regulations, which require re-evaluation at three-year intervals, but may be more often, all of which is included in Charter Application **p. 47**. Specific metrics used to monitor section 504 plans will vary depending on the needs of the student and will be written clearly into the plan.

While we addressed aspects of our ELL plan in our letter after our community input hearing, we would like to further note that within the first 20 days of school and based on the results of the Home Language Survey, Six Directions will contact previous schools to determine prior school year ACCESS scores. If the data is unavailable, Six Directions staff will administer the W-APT (WIDA-ACCESS Placement Test). If a student scores below 5 on the W-APT, then they will be recorded as ELL and will be required to take the ACCESS test in the

spring semester. The Teacher Language Observation form and Student Language Survey may be also utilized after enrollment for a student who is not succeeding academically, and the teacher believes that the student’s lack of English proficiency could be influencing his and/or her academic performance.

Governance Council Oversight

The CSD raised concerns that our application lacks clarity and detail in regards to the Governing Council’s training, self-evaluation, and oversight of school performance. In regards to Governing Council training, the Governing Council has a limited number of sources from which it can receive its required annual 5 hours--the New Mexico School Board Association, the PED, the New Mexico Coalition of Charter Schools, the Attorney General’s Office. The Governing Council intends to send representatives to each of these trainings this year, both for the purpose of acquiring necessary hours, but also so that those individuals can report to the rest of the GC in order to build the capacity of the entire group. In addition to the formal training, the GC will benefit from one of our GC members who is also currently a school board member in the Zuni School District, and can share her experience and knowledge. We will also engage NISN to build our GC’s knowledge and skill in providing oversight. Finally, our GC has already begun building a relationship with Uplift Community School’s Governance Council to learn from them and have been reviewing available online information related to New Mexico law and webinars on effective governance provided by the National Charter School Resource Center.

In regards to Governance Council self-evaluation, our GC has access to not only the resources listed in our application (p.70), but also to the experiences and tools used by other schools in NISN. Using those resources, our GC will collectively decide the exact tool and processes they want to utilize for self-governance as they finalize their board policies this fall. This choice was made intentionally in order to ensure that our GC members themselves, once formalized as a board of finance that meets regularly, had the opportunity to select the tools they deem best. The CSD expressed concern at the age a tool referenced in the application, the “Creating an Effective Charter School Governing Board Guidebook” for developing self-evaluation frameworks (it was published in 2000), however we understand this handbook to be a respected and highly-cited work nationally that many states rely on to inform new boards about best practices.

As part of their training and policy creation this year, our GC is committed to defining exactly how it will provide oversight of SDIS in the three main areas of concern: academic performance, organizational performance (including Head Administrator evaluation), and financial performance. The GC’s process for monitoring and providing oversight of SDIS will conform to the following structures. First, as alluded to on Preliminary Analysis Charter Application p. 62 and explained in more detail on p.72, the GC will monitor the school status on a monthly basis. Through the school’s committees and the regular GC meeting, they will review Head Administrator reports on academic progress of the school, Executive Director Reports on organizational aspects of the school, and Business Manager Reports on finances and budget. Second, the GC will receive updates and monitor progress each trimester with a similar timeline as the staff and students of SDIS. This will entail looking at available short-term academic indicators, observational data, financial indicators, and adjusting any policies or aspects of the strategic plan as necessary mid-year. Finally, each summer in June or July, the GC will conduct a review and analysis of all indicators of the school’s success towards realizing the school mission, including charter contract goals. At the end of each summer, before the new school year, in early August, the GC will have a retreat to create a strategic plan based on that analysis as well as to complete a self-evaluation of their individual performance as high-quality board members.

Academic Indicators	Organizational Indicators	Financial Indicators
PARCC and NWEA data	Staff surveys & retention rate	Audit findings
Student work samples and demonstrations of learning from Project-Based Learning	Student retention and holistic wellness indicators	Financial statements

Attendance rates	Family survey results and attendance rate at student-led conferences	Bank Statements
Student promotion/retention and course pass-rates	Policy and procedure effectiveness including evidence of compliance	Revenue Expense Reports
Observational data from classrooms and curriculum artifacts		A listing of checks and deposits, balance sheets and journal entries

Community Engagement

A final aspect of CSD feedback that we would like to address is concerning community engagement. In particular, the CSD found that we “do not adequately provide evidence of capacity to provide family and community involvement”. We believe, on the contrary, that family and community involvement is deeply part of what SDIS is and cares about. Beginning with our mission, culturally responsive teaching methodologies inherently recognize and respect local funds of knowledge. And our belief in the power of students being actively and civically engaged in their communities demands that we provide opportunities for school and community interaction. This belief is lived out across multiple places in our application, including the use of a Family Advisory Committee as a standing committee of the GC, and the FAC’s right to elect a member of its committee to a seat on the GC. Our commitment to family and community engagement is also reflected in the design of showcase events each trimester, in the use of community surveys, in the hiring of a community liaison, and in the use of community members as panelists for the senior project demonstrations. We have been hard at work in our community for over a year, meeting one-on-one with community members and parents and hosting public planning meetings. This was a model developed based on trainings from the Industrial Areas Foundation, Native American Voters Alliance, Albuquerque Interfaith, and the Native American Community Academy. This level of community engagement demonstrated during the charter development is significant in Gallup and will continue as we bridge the gap between home and school.

The SDIS application and the PEC’s community input hearing provide evidence of a broad coalition of support for our school in and around our community. As specified on **page 97**, we conducted 70 one-on-one meetings with parents, educators, policy makers, and other community members; through letters of support from groups as diverse as chapter houses, Kiwanis Club of Gallup, UNM-Gallup, and Teach For America; through the presence of supportive comment from youth, parents, and multiple local non-profits like the Zuni Youth Enrichment Program and the National Indian Youth Leadership Project (NIYLP) and absolutely no dissenting comments made during the input hearing or in subsequent public comment letters. SDIS is also privileged to have the support of the NACA-Inspired Schools Network, which offers us logistical support, start-up funding, and access to shared learning.

We know that our school has great potential in our community and that with the support of NISN, we are on track to excel in our planning year and to successfully open the school in summer 2016. Thank you for the opportunity to provide you this letter to further demonstrate our capacity and readiness to establish a high-quality charter school.

Respectfully,



Lane Towery on behalf of SDIS Team

*All pages referenced in this table are aligned to the pagination in the **Charter Preliminary Analysis**, sent by the CSD to the PEC and applicants on **August 10, 2015**.

Appendix

Reference Page	PED Feedback	SDIS Response
<p>C.2 How the Head Administrator Will Be Selected <i>Preliminary Analysis Charter Application, p. 73-76</i></p>	<p><i>“Limited description of the head administrator’s qualifications--only qualification identified is an administrator’s license”</i></p>	<p>SDIS application listed the qualifications of the Head Administrator as "having an administrator's license." Inherent in the 'NM administrator’s license is the qualification: Bachelor’s and Master’s Degree (earned from a regionally accredited college/university) AND Minimum of 18 semester hours of graduate credit in an Educational Administration program. Completion of an Administrative Apprenticeship/Internship at a college/university OR Completion of an Administrative Apprenticeship/Internship under the supervision of a local superintendent. AND Hold a Level 2 NM teaching license AND Content Knowledge Assessment (CKA) in Educational Administration. In addition to aforementioned qualifications, SDIS's application includes a high standard of rigor, including specific questions developed by a Governing Board as well as individuals with the qualities included in the Job Description Appendix and the Public Comment Letter to the PEC, August 20, 2015.</p>
<p>D.2 Job Descriptions (Appendix B.1 and Appendix D), <i>Preliminary Analysis Charter Application, p. 81-82</i></p>	<p><i>“Inadequate job descriptions that do not provide reporting lines”</i></p>	<p>SDIS delineated reporting lines in the Org chart found in Appendix B.1. If candidates meet the specified qualifications in terms of state requirements and mindsets aligned to SDIS school mission (both outlined in Job Descriptions, Appendix D), we do not feel arbitrarily choosing X years of experience for them is necessary for them to be successful educators to our students.</p>
<p>H. Student Recruitment, <i>Preliminary Analysis Charter Application, p. 104-105</i></p>	<p><i>“Not budgeted”</i></p>	<p>The budget, as submitted, includes SEG funding for years 1-5, while student recruitment as described will happen during the planning year and will be supported by startup funds from NISN. The Daniel’s Fund has committed funding for SDIS to support recruitment. Time and energy would be necessary to pursue the recruitment plan, which Lane, as the full time fellow, would be devoting his time to pursuing as mentioned in the application and the Letter to the PEC, August 20, 2015.</p>
<p>H.2 Lottery Process, <i>Preliminary Analysis Charter Application, p. 106-108</i></p>	<p><i>“Does not provide a clear lottery description with meaningful detail to understand how the lottery will be implemented”</i></p>	<p>SDIS outlined a comprehensive plan including specific dates, references to statutes that the school is aware of and is committed to adhering to. Additionally, the application elaborated on each of the statutes including a clear description of how and when it will be implemented including how students will be notified, what the school will do if all spaces are not filled, and how the school will provide a sibling preference as allowable.</p>
<p>I. Legal Compliance-Conflict of Interest, <i>Preliminary Analysis Charter Application, p. 109-110</i></p>	<p><i>“Does not demonstrate a capacity to comply with legal requirements”</i></p>	<p>The SDIS application included an extensive explanation of the desire to legally comply with all statutes, particularly in terms of conflict of interest. And the application included a conflict of interest policy statement in Appendix G. To support this, the PED's Preliminary Analysis concluded that this section met the criteria of demonstrating capacity to comply with legal requirements.</p>
<p>K. Waivers, <i>Preliminary Analysis Charter Application, p. 115-117</i></p>	<p><i>“Does not provide clear rationale for the waivers”</i></p>	<p>SDIS included very specific examples of when waivers might be appropriate. For example, for the "Teaching Load Waiver," a potential mission-aligned rationale, as mentioned in the application is "depending on the subject areas taught and school enrollment. For example, a teacher might have more students who desire to take Navajo language."</p>