

September 11, 2015

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,

In 1964, a new high school opened in Eastern Cibola County (then Valencia County). Up to that point students in the area had to drive or bus to Grants, nearly thirty miles away. The creation of the school was the realization of a community's need for a school that was located within the community. Fifty years later, there is once again a need for an alternative education system that supports parents and families in Eastern Cibola County. Over the past year, the STEAM Academy planning team has worked within the community to address and acknowledge that need and to develop a school that can support and enrich a number of students who have selected to leave the local school system in order to pursue educational alternatives. As we have articulated our vision, we believe high academic expectations and non-traditional instructional strategies, coupled with deliberate mentorship and strong health supports will produce students who are capable of serving their communities as robust citizens and culturally enabled leaders. Our ultimate vision is to create a school that is dedicated to serving as a center of community-based knowledge, innovation and creativity while developing sovereign and secure citizens ready to help our communities transition into the 21st century and beyond.

With the support of the NACA (Native American Community Academy) Inspired Schools Network (NISN), we have cultivated community relationships and determined what would constitute a strong and meaningful education for students in the Eastern part of the county. We have worked in the community hosting weekly meetings (more than nineteen), monthly talking sessions (five), and engaging the community in a way the local district has not (e.g. village meeting presentations). We have attended three state-required training sessions and seven monthly internal NISN informational and developmental sessions. The support from NISN has been vital, as NACA has more than a decade of experience in providing quality education to Native American students. NISN has and will continue to offer key supports with FTEs devoted specifically to developing data analysis and reporting, continuous improvement plans, financial support, coaching and networking opportunities, curriculum and professional development, governance training and support, facilities procurement and development and financial and legal policy development and adherence.

Ultimately, the charter application process is about demonstrating capacity and readiness. To that end, we believe we are ready to begin implementing plans to establish the STEAM Academy in Eastern Cibola County. Not only are we ready, but our community is also ready. As an appendix to this letter, we have addressed several PED concerns, either pointing to the evidence that was present in full in our application, or extrapolating on other areas where information was intuitive in the application, but not explicitly stated. There were two particular areas that demanded express attention: community/parental engagement and urgency of establishing this school.

First, the core work our efforts centers on community and parental engagement. We are not a one-size-fits-all, "school-in-a-box" that pops up and cures the educational ills of *any* community regardless of population or location. Our process has been built upon sustainability and longevity, to serve the particular need of our specific community, hence our connection with NISN and NACA. Further, our understanding of

the application process was aligned with the aforementioned PED trainings and the expectations from previous years, namely, that following approval of the application, the planning year would commence. It was our understanding that the planning year, as was the case in years prior, would allow the Governance Council to finalize policies, to execute on hiring, to decide timelines, and to allow the school to transition to the next stage in the charter development process in order to open the doors at the end of the year. We framed our efforts around this concept as it made sense within the broader goals of community engagement, ownership and development. Given that there was little change in guidance on the Application Kit from the previous year, we expected a similar analysis of our application that was given to last year's applicants. Upon recognition of the PED's shift in adjusting their metrics and process, our team has continued to respond internally, moving forward with our efforts of solidifying facilities, engaging more community members, developing timelines, and of, generally, creating a high performing charter school. Noting their concerns, we have worked with the NISN team and our planning team to strengthen the areas that were in the original application but may not have been fully recognized by the PED during their review.

Second, and most importantly, the establishment of this school is not something that can or should be delayed. For more than a decade the local communities have been discussing a charter option for students in the area and demanding a higher quality of education than what has been provided. Although the local school district has shown minor improvements in recent years, it is not clear that this will continue. The community should not have to wait another two or three years before they are able to avail themselves of a local option that has the strong potential to raise student achievement, promote strong cultural connections, and create a sense of wellbeing and fulfillment, especially when there is already a strong support network with a proven track record of success (NACA and NISN). This is what the STEAM Academy is able to offer: a choice and a positive alternative, that focuses on strong academic performance, which does not require a eighty-mile round trip each and every day. We have identified more than fifty students who make this commitment to travel and we believe in lieu of the travel time and funds it takes to make that trip, we could focus those resources on academics and engaging community.

We believe we have developed a strong application that will only continue to strengthen with the support of NISN and our local community. Even now, we continue to work with our partnering agencies, including: St. Joseph's Elementary School, whose Educational Board has recommended we continue our conversations regarding co-locating on the property and is willing to work with us around the separation of religious and nonreligious educational promotion. Through our work with UC Berkeley, we have heard that there may be interest from Google in supporting the STEAM Academy. We continue to assess teacher capacity and recruiting teachers, instructors, and volunteers. Finally, we remain steadfast in creating opportunities to engage parents and students who have stated that they would be very interested in attending the STEAM Academy.

We hope that all due time and consideration will be given to our application and we look forward to your final decision.

Sincerely,



Dr. Lee Francis IV on behalf of the STEAM Academy planning team
STEAM Academy Founder

Application Section*	Comments from CSD	The STEAM Academy's Response
Academics C.2 Rationale & Plan for goal assessment, p.9-11 p.50-52, 67 Appendix ACD	<i>"Rational is general and unclear; insufficient information to determine if the goals are rigorous or attainable; limited plan for assessing the goals."</i>	<p>In alignment with the Charter Application Kit prompts,, all SMART components are evident in the STEAM Academy's proposed goals.The rationale for the goal targets require an understanding of the document in the Appendix ACD which provides information to demonstrate which scores on the NWEA MAPS assessments correlate with average ACT scores of different types of colleges.The scores vary by subject level, thus our rigorous and attainable targets varied accordingly. Further, we describe on page 50 and 52 how faculty and staff will analyze NWEA data, and how the GC will assess goal accomplishment among other school indicators on p.67.</p>
Academics G. (1) (d) Charter Preliminary Analysis, p. 32-39	<i>"The plan provides a limited plan for budgeting and staffing to meet the identified needs and educational plans for students needing special education support/services. The plan minimally addresses how the proposed school will provide ancillary support."</i>	<p>STEAM Academy 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 steps will take place to provide ancillary support.</p> <p><u>Prior to the opening of STEAM Academy, the School Director will:</u></p> <ul style="list-style-type: none"> -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 or EASi) if this is the best option. -Establish partnerships and contract with local entities that are able to provide ancillary services. An MOU will be developed if this is the best option. -Review IEPs of incoming students prior to the school year to determine services required to meet the individual needs to the students. By so doing, STEAM Academy 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. <p><u>Throughout the school year:</u></p> <ul style="list-style-type: none"> - If a student has gone through the SAT process and they are being evaluated, the diagnostician will determine if further evaluations are required before eligibility can be determined. Once the evaluation is completed, and it is determined the student requires services, then based on the evaluation, ancillary services will be provided according to the evaluation and recommendations from the IEP team as to the amount of service to be provided. -Annually, an IEP meeting will be held to determine Progress toward Goals set by the IEP team. In addition, when the team meets quarterly, Progress toward Goals will be reviewed to address growth. If the student has met his/her goals, and a recommendation is made by the ancillary provider or teachers that he/she no longer requires services, data will be provided by the teachers and an evaluation will be conducted to determine need before the student is exited from services. Exit from services will be according to Federal and state regulations and according to the NM TEAM manual.
Academics G. (2) Students with Section 504 Accommodation Plans	<i>"Does not address how they intend to monitor the progress and success of students with Section 504 Plans."</i>	<p>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 quarterly when the Core-Circle team meets, as stated on p.15, 40, 52. The team will also include data from the ancillary staff (if applicable). As students progress through high school and their service learning projects and community projects are created, the student's mentors, community engagement partners will also provide quarterly documentation as to the student's success and progress towards goals. Periodic</p>

		<p>re-evaluation is required. This may be conducted in accordance with the IDEA regulations, which require re-evaluation at three-year intervals (unless the parent and public agency agree that re-evaluation is unnecessary) or more frequently if conditions warrant, or if the child's parent or teacher requests a re-evaluation, but not more than once a year (unless the parent and public agency agree otherwise).</p> <p>Section 504 specifies that re-evaluations in accordance with the IDEA is one means of compliance with Section 504. The Section 504 regulations require that re-evaluations be conducted periodically. Section 504 also requires a school district to conduct a re-evaluation prior to a significant change of placement. OCR considers an exclusion from the educational program of more than 10 school days a significant change of placement. OCR would also consider transferring a student from one type of program to another or terminating or significantly reducing a related service a significant change in placement. The protections of Section 504 extend only to individuals who meet the regulatory definition of a person with a disability. If a recipient school district re-evaluates a student in accordance with the Section 504 regulatory provision at 34 C.F.R. 104.35 and determines that the student's mental or physical impairment no longer substantially limits his/her ability to learn or any other major life activity, the student is no longer eligible for services under Section 504.</p>
<p>Academics G. (3) English Language Learner (ELL) Identification</p>	<p><i>“Does not clearly articulate what the student must demonstrate in order to identify the need for support.”</i></p>	<p>Students who enroll at the STEAM Academy will be required to complete the Home Language Survey during the registration process (p.41). STEAM Academy staff will ensure that parents/guardians are aware of the form, school-based ELL assessments, and the various services available for ELL students. Within the first 20 days of school and based on the results of the Home Language Survey, STEAM will contact the previous school to determine prior school year ACCESS scores. If the data is unavailable, STEAM Academy staff will administer the W-APT (WIDA-ACCESS Placement Test). If a student scores below 5 on the W-APT, they will be recorded as ELL and will be required to take the ACCESS test in the spring semester. The W-APT information will help school staff and administrators in planning for programmatic placement (Rtl, ELL placement, developing language curricula, etc). Students identified as ELL will continue to receive services until their annual ACCESS score is 5 or higher. Once a student receives a 5 or higher, then the STEAM staff will determine the level of monitoring to ensure continued success. The STEAM Academy will also use a Teacher Language Observation form 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.</p>
<p>Academics G. (3) (b) Supports for Identified Students, Charter Preliminary Analysis, p. 42</p>	<p><i>“Limited explanation of how the proposed school will provide services/supports to identified students.”</i></p>	<p>As part of the recruitment process, the STEAM Academy will recruit a teacher that is highly qualified in the area of Language Arts and TESOL to implement research-based practices for Native American English Learners. This will ensure that whether the teacher is delivering instruction in the English as a Second Language component or delivering instruction as Course 1063 meets the requirements according to the BMEB Technical Assistance. The TESOL endorsed teacher will also serve as the ELL coordinator for STEAM Academy. This individual is knowledgeable of the TESOL Teacher Competencies therefore is able to provide training to the staff in collaboration with the head administrator. As part of STEAM Academy's commitment to provide quality instruction to our students, the intervention specialist will be knowledgeable in intervention strategies for all students (Rtl, Special Education, 504 and ELL). This individual's expertise in collaboration with the TESOL endorsed teacher and the head administrator will be valuable in providing professional developing the staff of STEAM Academy.</p>
<p>Academics G. (3)(c) Differentiation for ELL students</p>	<p><i>“Inadequate description of how instruction will be differentiated based on identified student needs.”</i></p>	<p>Differentiation of instruction for ELL students will be based upon the the characteristics of English Level Proficiency and the Language Arts Standards. The areas of proficiency to be addressed are listening, speaking, reading and writing. A student may demonstrate beginning proficiency in the area of listening so an example of differentiation may be repeating words or phrases when asked or for verbal practice. If a student demonstrates intermediate</p>

		proficiency in the area of writing, a differentiation strategy may be the organization of ideas through writing (p. 43-44).
Academics G. (3)(d) Monitoring progress of ELL Students	<i>"Incomplete plan to evaluate and monitor the progress of English Language Learners, data, and how that data would inform the evaluation process."</i>	The TESOL endorsed teacher, also identified as the ELL Coordinator (p.42), will be responsible for administering the W-APT and ACCESS evaluations. Once the scores are received, the ELL Coordinator will be responsible for disseminating information to the staff and provide strategies to use in promoting academic success for the ELL students. Data will include information such as if the student demonstrated weakness in the area of listening, writing, and speaking and this will inform instruction. The Core-Circle team will meet quarterly to review student success and progress toward goals in the student's ILP. If the student is not making progress, the team will review alternate strategies to implement.
Organizational Framework A.(3) GC member selection	<i>"Limited process for selecting new members; inadequate enumeration of skills or qualifications"</i>	On p.59 we describe how vacancies on the GC will be addressed. The bylaws expand on the process of membership selection (Appendix B); qualifications of future council members are enumerated on p.60.
Organizational Framework C.(1) Leadership and Management	<i>"Limited detail on what the board will review and outcomes considered in monitoring."</i>	Standing items on the board agenda enumerated on p.64 include the HA and Director's reports, Finance/Business report, student academic performance, progress toward organized, academic goals, and audit results.
Organizational Framework D 6 Professional Dev Plan	<i>"Limited PD plan because no meaningful detail on the structures with which it will be implemented"</i>	Page 78 details the PD topics, who would provide the PD (including internal and external entities), who at the school would be responsible for coordinating the PD, how it will be budgeted and individualized based on staff needs. Page 79 of the comments in the preliminary analysis states the PD plan does not include <i>"what specifically would be addressed in each of the trainings/development sessions"</i> . The rubric does not specify that a calendar of sessions be set, however when the 2016-17 school calendar is created, such level of detail will be established.
Organizational Framework K. Waivers	<i>"Limited info on how waivers might be used"</i>	On p.100-101 all waivers include a description of how it will support the school's plan and flexibility, e.g., the STEAM Academy will not offer Driver's Education. We understand the PED shall waive the requests in accordance with 22-8B-5 NMSA 1978 and those waivers granted will be incorporated into the charter contract.
Organizational L. Transportation	<i>"Inadequate description"</i>	On p.103 we describe plans to provide transportation, discuss options and include in the budget funds for the first year to purchase bus passes.
Finance B.(2) Internal Control Procedures	<i>"Internal Control [procedures] are not provided"</i>	The prompt on p.119 asks for "description" of internal controls, we describe on p.119-121 the procedures that ensure compliance and operational efficiency.
Finance B.(3)	<i>"Does not identify staff to act as a certified procurement officer"</i>	Although the prompt on p.123 does not specify that the school should name a procurement officer, STEAM Academy is working with a NISN certified business manager who will have, by November, a procurement officer certification. The Head Administrator may also seek such certification if it improves operational efficiencies.

*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**.