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2017 Public Education Department Preliminary Analysis of Renewal Application (Part B – E)

November 7, 2017

School Name: Taos International School (TIS)
School Address: 118 Estes ES, Taos, New Mexico
CEO/Principal: Nadine Vigil
Business Manager: Julian Gallegos
Authorized Grade Levels: K-8
Authorized Enrollment: 360
Mission: Taos International School (TIS) will provide K-8 students an educational program focused on inquiry-based teaching and learning, through the International Baccalaureate (IB) Primary and Middle Years Programs; the acquisition of languages including Spanish immersion and Mandarin Chinese; and the development of social, emotional, and rigorous academic skills necessary to function in our local, national, and international community.

SECTION 1. ACADEMIC PERFORMANCE FRAMEWORK

Department's Standards of Excellence—A-F Letter Grades

This section includes analysis of academic performance of Taos International School (TIS) towards meeting the Department's Standards of Excellence –A-F Letter Grade System. **Based on the data and the site visit to the school, Part B, Section 1a, Department's Standards of Excellence, A – F Letter Grades, is rated as Failing to Demonstrate Progress.** Below, TIS's performance on each component is compared to schools within Taos Municipal Schools (TMS) one of which is a K-8 charter school as well, and evaluated over time. TIS's performance was also compared to similar schools statewide. Note that the A-F Letter Grade System used Standards-Based Assessment (SBA) results during 2014, while Partnership for Assessment of Readiness for College and Career (PARCC) results was used 2015 – present.

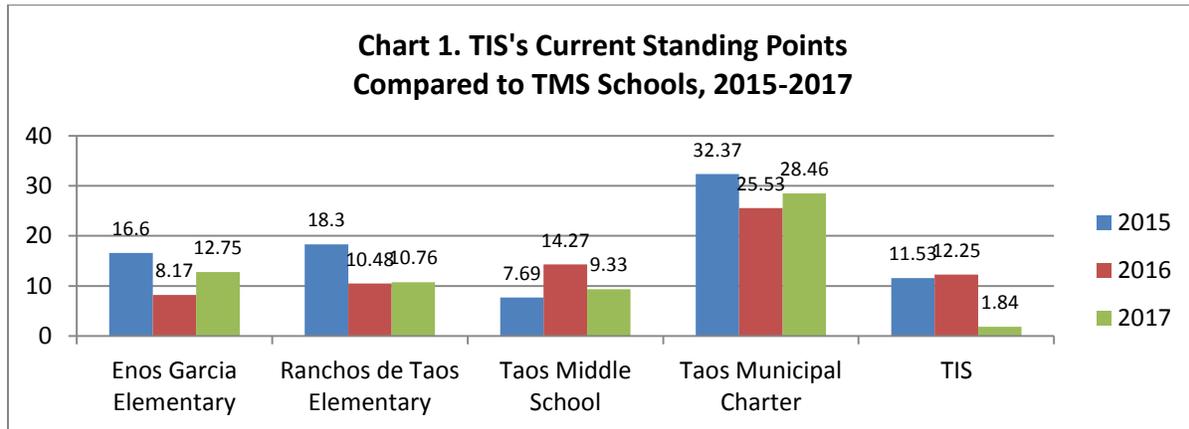
Current Standing

TIS was outperformed by area schools.

TIS was outperformed by a majority of area schools in the **Current Standing** component in nearly each year of its contract.

Current Standing. The current standing performance on the School Grading Report for TIS was compared to two elementary, one middle, and one K-8 charter school and is presented in Chart 1. Taos International School’s performance compared to TMS schools is as follows:

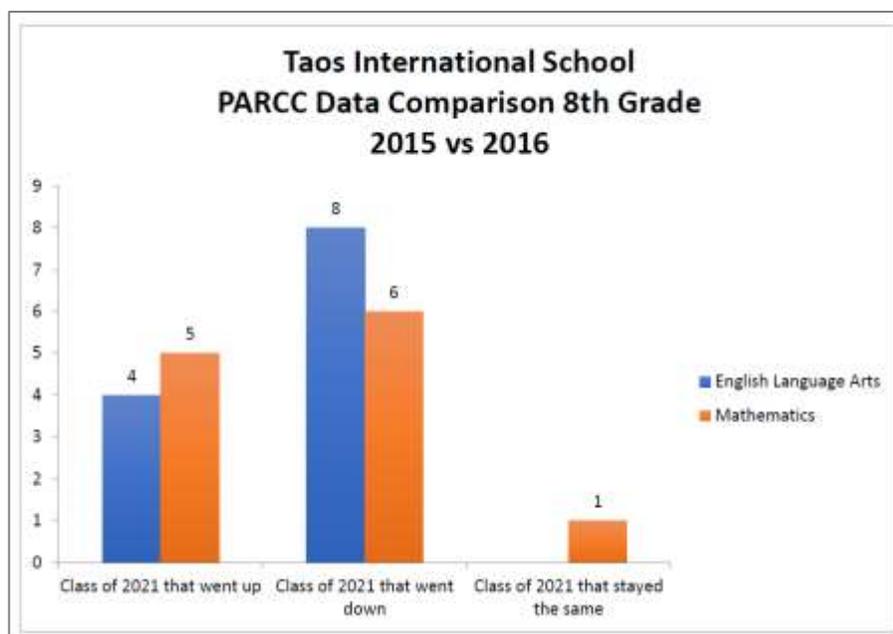
- In 2015, three TMS schools outperformed TIS.
- In 2016, two TMS schools outperformed TIS.
- In 2017, all TMS schools outperformed TIS.



Taos International School was outperformed by a majority of area schools in the **Current Standing** component in two of three years its contract.

In addition, TIS’s performance, while improving slightly in 2016, is lower in 2017 than it was in either 2015 or 2016. This lower performance is the result of continually declining math proficiency rates, reading proficiency rates that briefly increase in 2016 but then decrease in 2017, and continually declining growth (at the student level in comparison to academic peers) in both math and reading from 2016 to 2017. (See 2017 letter grade report, pages 2 and 3 for more detail.)

The school’s own data in its Appendix shows that a larger percentage of its 8th grade students saw a decline in PARCC performance from grade 7 to grade 8 than saw no change or an improvement.



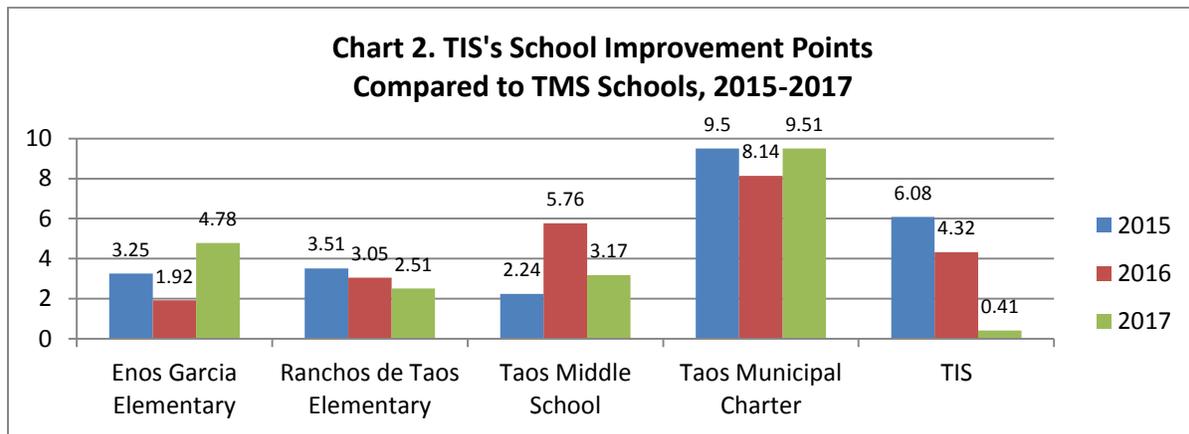
School Improvement. The school improvement performance (formerly known as *School Growth*) on the School Grading Report for TIS along with schools in TMS is presented in chart 2. TIS’s performance compared to TMS schools is as follows:

- In 2015, TIS outperformed 3 TMS schools.
- In 2016, 2 TMS schools outperformed TIS.
- In 2017, all TMS schools outperformed TIS.

School Growth

TIS had a mix of over- and under-performing area schools.

TIS outperformed area schools at the beginning of its contract, but underperformed towards the end in the **School Growth** component during a 3-year period.



TIS had a mix of over- and under- performance when compared to schools in TMS. TIS outperformed TMS schools in the earlier portion of its contract years, but underperformed at the end in the **School Improvement component** of the A-F Letter Grade System.

In addition, TIS’s performance has steadily declined through the three years of its contract (i.e., from 6.08 points in 2015 to .41 points in 2017). This lower performance is the result of continually declining growth (at the student level in comparison to academic peers) in both math and reading from 2016 to 2017.

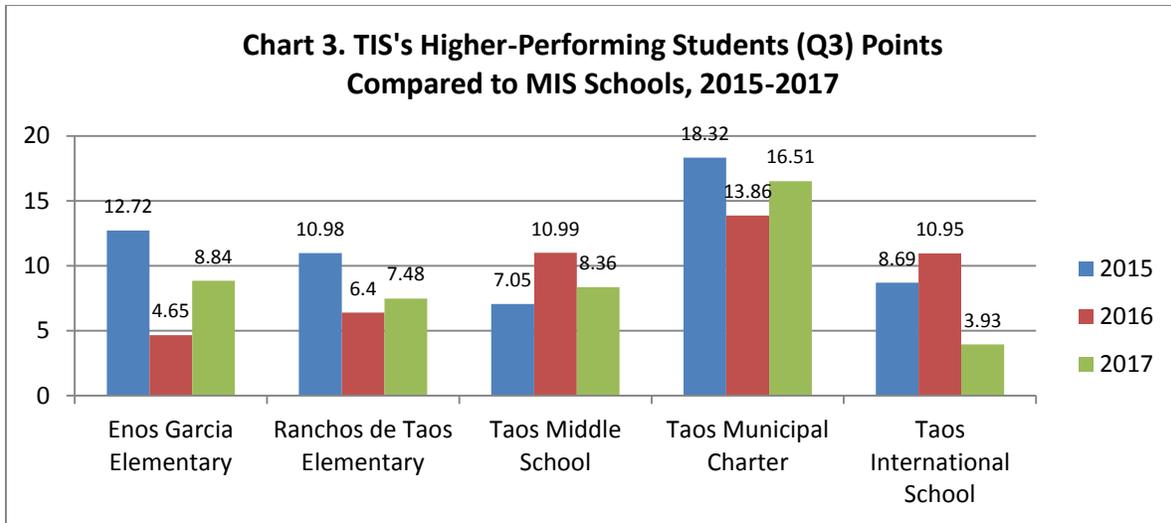
Higher-Performing Students. The performance of top three quartiles of students, the higher-performing students (or Q3), on the School Grading Report for TIS along with area schools in TMS is presented in chart 3. TIS’s performance compared to TMS schools is as follows:

- In 2015, three TMS schools outperformed TIS.
- In 2016, two TMS schools outperformed TIS (*although one had near identical points to TIS*).
- In 2017, all TMS schools outperformed TIS.

Highest-Performing (Q3)

TIS was outperformed by nearly all area schools in most years.

TIS was outperformed by nearly all schools in **Highest-Performing Students** component by as much as 12 points in one of the years.

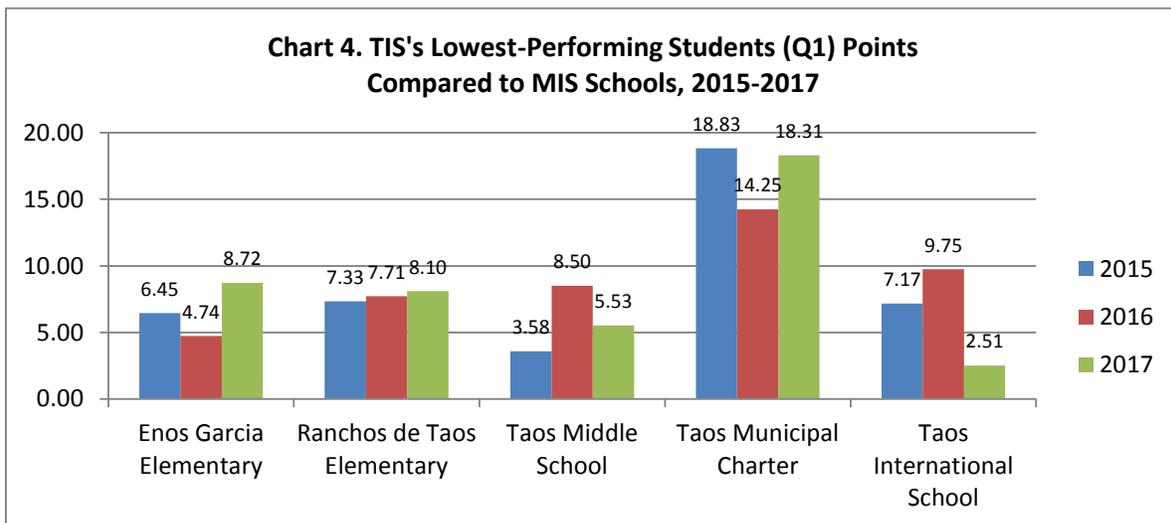


TIS was outperformed by most area schools in the **Higher-Performing** component in nearly each year of its contract (by as much as 12 points during one year). In addition, while TIS's performance increased between the first and second years of its contract, in the third year its performance substantially decreased. This lower performance is the result of a drastic decline in student growth specifically from 3.44 (2015) to -.41 (2017) in reading and .15 (2016) to -1.61 (2017) in math.

Lowest-Performing Students. The performance of the bottom quartile of students, the lowest-performing students (or Q1), on the School Grading Report for TIS along with 4 area schools in TMS are presented in chart 4. TIS's performance compared to TMS schools is as follows:

- In 2015, two TMS schools outperformed TIS.
- In 2016, TIS outperformed three TMS schools.
- In 2017, all TMS schools outperformed TIS.

Lowest-Performing (Q1)
TIS had a mix of over- and under-performing area schools.
 TIS performed well in 2016, but performed moderately (2015) or were outperformed by all schools (2017) in the 2 other years.



TIS had a mix of over- and under- performance when compared to area schools within TMS in the **Lowest-Performing Students** category of the A-F School Grading Report. TIS outperformed a majority of schools during one year (2016), but was outperformed by 2 TMS schools in 2015 and by all TMS schools in 2017. In addition, while TIS's performance increased between the first and second years of its contract, in the third year its performance substantially decreased. This lower performance is the result of persistent lag in growth for TIS's Q1 students specifically in reading (-1.12 in 2015, -.05 in 2016, and -1.55 in 2017) when compared to academic peers statewide.

Comparison Schools Ranking in Most Recent Year (2017). This analysis also includes a comparison of Taos International School's performance on the A-F School Grading Report in relation to similar schools statewide.¹ The cluster of schools in which TIS was compared in 2017 totaled 134 schools. Among similar schools to which it was compared, TIS ranked below the 10th percentile on all indicators except one (Opportunity to Learn, OTL). Out of 134 schools, TIS ranks last in Current Standing and second to last on School Growth. See Table 1 below.

Table 1. TIS's Percentile Rank and Rank Order by School Grade Indicator, 2017							
	Current Standing	School Growth	Highest-Performing	Lowest-Performing	OTL	Graduation	CCR
Percentile Rank	1 st	2 nd	8 th	3 rd	41 st	N/A	N/A
Rank Order <i>(Out of 134 schools)</i>	134 th	133 rd	125 th	130 th	93 rd	N/A	N/A

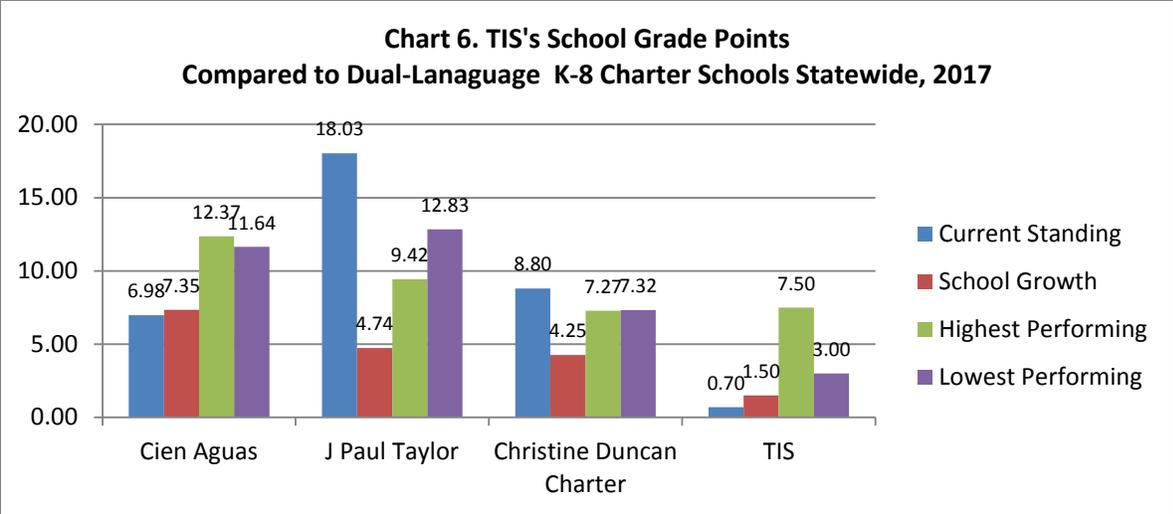
Comparison to K-8 Dual Language Schools. Another comparison was made with three K-8 charter schools that offer a dual language program (see chart 6).

TIS Compared to Similar Schools

TIS ranked well below other schools in majority of categories in both comparisons (similar schools and K-8 dual language schools).

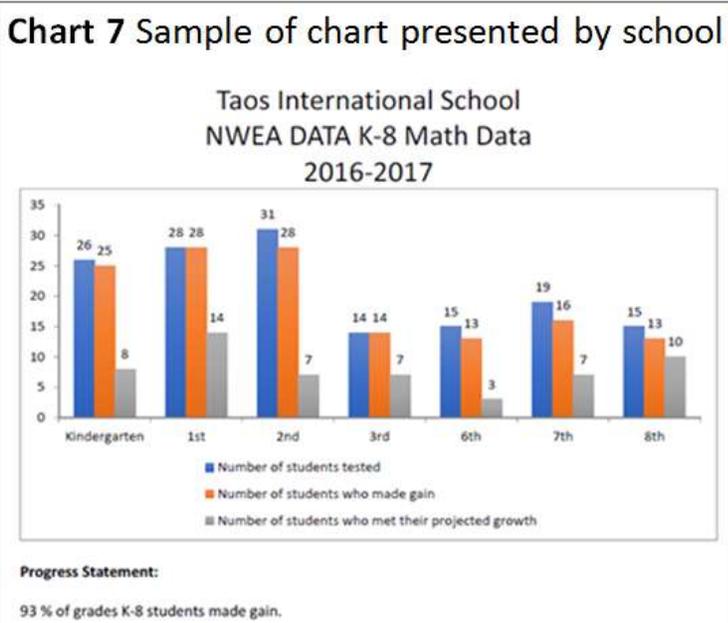
TIS ranked well below similar schools (134 total) in 4 of 5 A-F School Grading Report categories (current standing, growth, Q3, and Q1) and within the average range in 1 category (OTL). Also, TIS ranked at the bottom in all but one category when compared to other K-8 charter schools with dual language programs.

¹ Similar schools are determined based on the demographics of the schools. The analysis uses the percentage of students that are mobile, English learners, students with disabilities, economically disadvantaged, African Americans, Hispanic, and Native Americans. School clusters also include only school that serve the same grades. SAM schools are also evaluated separately.



TIS performed at or near the bottom in each category of the A-F Letter Grade System when compared to other K-8 charter schools with a dual-language program. TIS’s underperformance was as large as 17 points in one category (**current standing**) and as much as 9 points in another category (**lowest performing**). The only comparison where TIS outperformed another dual language school (albeit by a fraction of a point or .23 points to be exact) was in the growth of the **highest performing** students in comparison to Christine Duncan Heritage Charter School, which earned an overall “D” grade.

Comparison of Short-Cycle Assessment and State Summative Assessment Results. TIS presented multiple charts in its Renewal Application such as “NWEA [also known as MAP] Data K8 Math data 2016-2017” (see p. 13 of appendix entitled “2 Appendices A.” Chart 7 illustrates a sample of NWEA short-cycle assessment results the school presented in support of positive progress towards one of its academic mission-specific indicators. According to the school, academic growth “can be attributed to consistent utilization of School Improvement Plan which began in March of 2017” (Renewal Application, p. 18). Note that the school has had an overall rating of D (2015), D (2016), and F (2017) during the past 3 years and such plan commenced in the spring of 2017.



In the school’s analysis of its short-cycle assessment data, TIS highlighted growth in student achievement on multiple assessments (e.g., I-Station and NWEA). According to TIS, academic growth increased in both reading math across grades. For example, TIS states that:

- “I-Station data [reading] from 2016-2017, 54% of students in kindergarten achieved more than 1 year’s gain” (Renewal Application, p. 16).
- “In 2nd grade 55% of students achieved more than 1 year’s gain” (Ibid).
- “In 3rd grade 71% of students achieved more than 1 year’s gain” (Ibid).

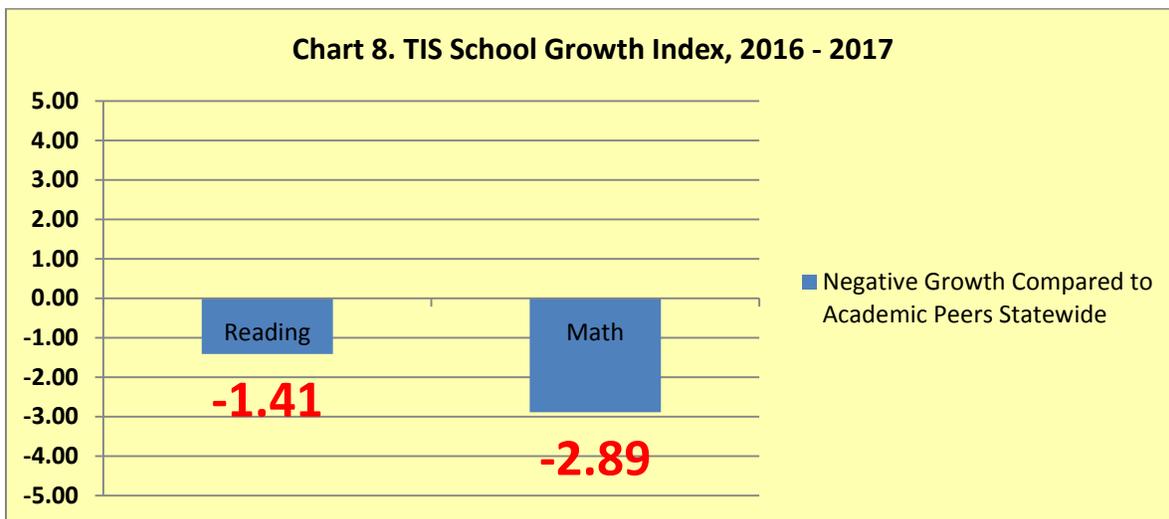
- “In 6th grade 2015-2016, 45% of students achieved projected growth in Reading [NWEA]” (Ibid).
- “In Kindergarten, 2015-2016, 73% of students achieved academic growth in Math” (Ibid).
- “93% of grades K-8 students made gain [in math]” during 2016-2017 (‘2 Appendices A,’ p. 13).

The school did not provide data in a format that could provide a comparative analysis year over year either at the same grade level or for the same group of students. In earlier years the school broke data out into different groups. In addition, the school reports data citing “student made gain” and “student met projected growth separately”. The school did not report data according to the goals as written.

In any case, NWEA or MAP data in 2016-2017 is reported indicating that 36% of students grade K-8 made projected growth. The data from the prior year seems to indicate that 10% of Kindergarten students, 63% of 1st grade students, 57% of 2nd grade students, 70% of 6th grade students and 62% of 7th grade students met their math projected growth. The comparison appears to show that fewer students met math projected growth in 2016-2017. This does align with performance described in the School Grading Reports, which demonstrated declines in math performance.

Short-cycle (formative) assessment results highlighting “gains” simply do not align with outcomes on the School Grade Report Card for 2017 (see chart 8). TIS’s claim of significant academic growth is not reflective of actual school growth based on the value-added modeling growth indexes used for comparative purpose with academic peers.

Short-Cycle Assessment “Growth” Over-Emphasized Significant “academic growth” mentioned does not reflect negative growth in PARCC ELA and math.
 TIS was unable to show how significant “growth” on short-cycle assessments translate to positive growth on most recent PARCC (2017).



TIS’s focus on “academic growth” almost exclusive of proficiency and growth targets established by assessment vendors is not rigorous and is misleading when compared to growth indicators in the state’s summative School Grade Report Card.

Summary: Department's Standards of Excellence – A-F Letter Grades

Although TIS discussed activities it purportedly took to improve student achievement, the PED team did not observe thorough and sustained implementation of a number of activities mentioned in the renewal application narrative during the site visit which took place October 25, 2017.

Increased Instructional Hours. According to TIS's response in the Renewal Application,

Instructional time has been increased through a longer school day, allowing for specific one-on-one or small group instruction in targeted areas of need. (Renewal Application, p. 18).

While the school day has been lengthened, the overall instructional time has not changed because the school has changed Fridays from full days to partial days and has designated one full Friday per month to PD instead of instruction. The purpose of this was to improve student performance, but as is noted, the student performance declined in the first year of implementing this change. Thus, this effort has not been verified.

Professional Development in GLAD and SIOP. According to TIS's response in the Renewal Application,

...teachers have received Professional Development [PD] in English Language Learner [ELL] processes through the GLAD Program and the Sheltered Instruction Observation Protocol [SIOP] (Renewal Application, p. 18).

During the teacher interview portion of the site visit, a number of teachers acknowledged that "GLAD trainings were provided by other teachers [in-house]" but were unaware of what "SIOP" or "Sheltered Instruction" was when asked if training on the topic had been done. Observations of the classrooms did not support consistent incorporation of those strategies into classroom practice. Further, the administration agreed that new teachers in the current year had not received training or support to incorporate the practices in their classrooms.

Responsive Mind Set. According to TIS's response in the Renewal Application, "teachers have created highly diverse classrooms involving a Responsive Mind Set [RMS]" (Ibid). During the classroom observations and the teacher interview portions of the site visit, one teacher acknowledged the approach stating, "I'm pretty sure it's [Responsive Mind Set is the same as] 'responsive classroom'" further describing the process to PED team members. However, some teachers did not know about the approach or appeared unfamiliar with the term. Observations in the classroom demonstrated inconsistent use of this strategy in some classrooms appeared to show use of the strategies, while others did not.

Individual Learning Plans (ILPs). Students and teachers interviewed were able to describe "data portfolios" used during the current year stating that "it's created at the beginning of the year...were the goals were started out with." However, multiple students could not confirm their use by all teachers in prior years stating that "I think [specific teacher named] did the data binders last year, but not everyone." Review of data binders in the classrooms demonstrated that some classrooms were keeping binders updated and using them actively. However, other classrooms had data binders that were not being used and had not been updated.

Collaboration Amongst Staff. According to TIS, "staff adopts and deploys an approach to continually improvement [sic] and collaboration among one another to help students improve learning" (p. 19). During teacher interviews, staff responses were, "We focus on IB," "work as a grade level or groups," and "set NM Dash goals." Collaboration time also focused on appropriate use of "EPI pens," "training on food allergies," "reporting abuse and neglect," and "creating anchor charts with students." Collaboration

meetings did not appear systematic (e.g., one teacher described interventions that he used that appeared to be generated by him/her exclusively for his/her students).

The variance in the purported growth on short-cycle assessments by the school and resultant negative growth indexes in both reading and math identified in the A-F School Grading System (2017) is clear. In addition, comparing TIS's performance on the A-F School Grading System to similar schools that have equivalent risk indexes (134 schools) as well as three K-8 dual language charter schools showed a clear pattern of underperformance.

The school has consistently earned an overall School Grade of "D" in both the 2014-2015 and 2015-2016 school years and had earned an "F" during the 2016-2017 school year. The school continues to fall short of statewide benchmarks in the majority of academic components (3 of 4 during all 3 years) specifically when compared to similar schools both locally and statewide. For example in 2016, TIS failed to match or exceed statewide benchmarks in **current standing, school growth, and growth of lowest performing students**. It did however exceeded the statewide benchmark for **growth of highest performing students**.

The school has: (a) not demonstrated a record of meeting all standards in each of the years of the contract since the 2014-2015 school year and (b) the "data demonstrates performance that has continued to decline" and has "remained at an unacceptable level" (e.g., well below the 10th percentile in 4 of 5 categories during the 2016-2017 school year when compared to similar schools) (see Renewal Application Rubric, P. 15). Further, (c) the narrative describes *general* improvement actions to improve performance and outcomes, which do not appear to be connected to any specific root causes, and (d) during the site visit, evaluation of evidence did not fully support the consistent, sustained implementation of reported improvement actions.

Lastly, several of the described improvement efforts are expectations of the basic program described in their charter, or required by law. These include:

- 1) *"Instructional strategies include school wide dual language immersion requiring students to study English and Spanish through a long range educational plan. This process contains clear criteria for student progress throughout all grades."*
- 2) *"Teachers also use Response to Intervention (RTI) strategies. RTI strategies included grouping students by ability with focus on the lowest Q1 population."*
- 3) *"Reporting on progress ...through a Standards Based Report Card to communicate with parents" and "Parent teacher conference."*
- 4) *"Self-Monitoring by staff which incorporated using Map, I-Station, Woodcock Munoz and NMSBA."*

These items listed as improvement efforts align specifically to the following items listed in the charter as essential elements of the school's education program:

- 1) TIS will use a one-way language immersion approach to teach languages, starting with 90% of instruction in Spanish/10% of instruction in English beginning in Kindergarten, and shifting to 40% Spanish/60% English in the upper grades.
- 2) [T]hrough assessments based on the school's core instructional materials and through standardized assessment tools, such as Woodcock Muñoz and WIDA / ACCESS, etc). Teachers will capture performance data from these assessments and use them to guide both large-group instruction and provide targeted interventions.

- 3) The school will meet or provide information several times to students and their parents/guardians in advisories that will help them set or adjust individualized programs, targets, short-and long-term goals, and review progress and performance.
- 4) Teachers will be trained in the use of short cycle and other assessments, how to understand the data and use the data to drive instruction.
- 5) Teachers will be trained in the International Baccalaureate Primary Years Programme
- 6) Teachers will be provided with regularly scheduled collaborative planning time in order to build the TIS Program of Inquiry and all elements of the Primary Years Programme.

TIS has failed to demonstrate substantial progress “*towards achievement of the department’s standards of excellence*” (NM Stat § 22-8B-12 NMSA) and data continued to decline (i.e., growth index in reading and math were both positive in 2014-2015, negative and positive in 2015-2016, and all negative in 2016-2017). Lastly, verification of narrative responses provided in the renewal application was mixed at best. Consequently, the rating for **Part B, Section 1a, Department’s Standards of Excellence, A – F Letter Grades, is rated “Failing to Demonstrate Progress.”**

School Specific Charter Goals

This section includes analysis of TIS’s performance on its school specific charter goals during the course of its contract (excluding the final year). TIS has 4 mission-specific indicators. Below are description and analysis of each indicator:

Mission-Specific Indicator 2.a

Short Cycle Assessment data (NWEA) will be used to measure academic growth or proficiency in Reading for Full Academic Year (FAY) students.

Growth. In order to show growth (the first phrase in each of the standards set forth below), FAY students will demonstrate academic growth in Reading as measured by three short cycle assessments using NWEA MAPS grade level assessment. The growth will be determined using NWEA MAPS results for each student as set by the fall test. Students may show the growth on either of the winter or spring assessments. (“One year’s growth” will be defined as the growth identified on the fall test on the Achievement Status and Growth Projection Report as the “projected RIT” score. If the student matches or exceeds the “projected RIT” score in either the winter or the spring, then that student will have shown “one year’s growth.”)

Grade Level Proficiency. In order to show grade level proficiency (the second phrase in each of the standards set forth below), a student must test at “average”, “high average” or “high” as identified on winter or spring test as shown on the NWEA MAPS Grade or Class report.

Analysis. TIS emphasized that it *“has met goals for Reading in different levels and grades for school years 2015-2017”* (Renewal Application, p. 20).² The PED team reviewed the school submitted data which was a mix of assessment vendor (e.g., NWEA Achievement Status and Growth Projection Report and I-Station report) and school generated reports. School-generated reports specifically described disaggregated data primarily by grade. For example,

- 2015-2016 report states, *“NWEA Maps data shows 45% of Sixth grade students made projected growth in Reading”* (Uploaded web-EPSS school-generated document entitled, ‘2015-2016 Assessment Data 8.15.16’).
- 2016-2017 report states, *“46% of 6-8 grade students met typical yearly growth [in reading]”* (Uploaded web-EPSS school-generated document entitled, ‘Mission-Specific Indicators assessment data 7.17.17’).

Activities purported to have resulted in such student outcomes included completion of *“numerous hours of professional development towards IB certification”* (p. 21) and a host of other activities one of which was offering of:

...Ninety percent Spanish and ten percent English immersion, dual language, in IB kindergarten, elementary PYP and middle school MYP. First grade is eighty percent Spanish and twenty percent English [and so forth up the grades] (Ibid).

During the renewal site visit held October 25, 2017, PED team members observed evidence that the school had and is currently implementing a number of these activities but not always with fidelity. For example, during classroom observations and document reviews, PED team members confirmed administration of NWEA assessment and use by teachers to establish student academic goals that are reviewed by both students and teachers purportedly at least once per week. Student interviews supported the claim that TIS had administered, reviewed, and used student data to drive instruction. For example, one student stated, *“We do MAP 3 times a year. We have a data binder for it.”* Another student added *“we do data binders in class too.”* The PED team was also able to confirm the use of International Baccalaureate (IB) materials by teachers during classroom observations.

During the site visit, students had already been administered Beginning-of-the-Year (BOY) assessments with some being progressed monitored prior to MOY assessment administration using teacher-created tests that appeared to be non-standardized differing from one teacher to another. Consequently, strategic placement of students in intervention groups was not evident. For example, during teacher interviews one teacher stated, *“we look at data and its effect on Rtl....specifically grouping. In MAP I look at the ‘learning continuum”* while another teacher stated, *“I look at the lexiles since MAP is not specific on shortcomings [i.e., how to address deficit or needs areas].”* The same teacher added, *“It’s hard to go straight from MAP at least with math to the classroom. Over time I just learned to compensate and supplement instruction.”* Adult actions described in the Renewal Application to improve student outcomes were observed, but appeared inconsistent at best. However, it should be noted that the actions did not appear to be, and were not described as being, connected to any identified root causes that needed to be addressed to improve school performance.

² A reading of the goal indicates that it is not a goal to be reported at different grade levels, but instead is a goal to be reported as a whole for all applicable students in all tested grade levels.

Mission-Specific Indicator 2.b

Short Cycle Assessment data (NWEA) will be used to measure academic growth or proficiency in Math for Full Academic Year (FAY) students.

Growth. In order to show growth (the first phrase in each of the standards set forth below), FAY students will demonstrate academic growth in Math as measured by three short cycle assessments using NWEA MAPS grade level assessment. The growth will be determined using NWEA MAPS results for each student as set by the fall test. Students may show the growth on either of the winter or spring assessments. (“One year’s growth” will be defined as the growth identified on the fall test on the Achievement Status and Growth Projection Report as the “projected RIT” score. If the student matches or exceeds the “projected RIT” score in either the winter or the spring, then that student will have shown “one year’s growth.”)

Grade Level Proficiency. In order to show grade level proficiency (the second phrase in each of the standards set forth below), a student must test at “average”, “high average” or “high” as identified on winter or spring tests as shown on the NWEA MAPS Grade or Class report.

Analysis. TIS reiterated/restated its math-focused indicator verbatim in the Charter School Goals section of the Renewal Application, but made no mention of its progress with the indicator at any time during the term of its contract within the narrative section of the application. The school did provide supporting documents contained description of disaggregated data (rather than a composite description to confirm or disconfirm achievement of indicator standards). Examples of disaggregated descriptions related to the indicator include:

- 2016-2017 report states, “36% of K-8 grade students met projectd [sic] growth” (Uploaded web-EPSS school-generated document entitled, ‘Mission-Specific Indicators assessment data 7.17.17’).
- 2015-2016 report states, “NWEA MAPA [sic] data shows 10% of Kindergarten students made projected growth in Math” (Uploaded web-EPSS school-generated document entitled, ‘2015-2016 Assessment Data 8.15.16’).

Activities purported to have resulted in student results or outcomes above include completion of “numerous hours of professional development towards IB certification” (p. 21) and a host of other activities such as offering of:

...Ninety percent Spanish and ten percent English immersion, dual language, in IB kindergarten, elementary PYP and middle school MYP. First grade is eighty percent Spanish and twenty percent English [and so forth up the grades] (Ibid).

These activities, however, are the same set of “adult actions” (Renewal Application, p. 15) for all 4 indicators regardless of whether or not such indicators were previously met. See analysis from prior sections, which demonstrates adult actions described in the Renewal Application to improve student outcomes were observed inconsistently, and were not supported by an analysis of root causes. Further, the actions are not specific to any given indicator or targeted to improving performance in any specific area (e.g., TIS failed to explain and provided evidence as to how the 90/10 dual language program or the International Baccalaureate (IB) program remedies consistently low student performance in math across multiple years).

Mission-Specific Indicator 2.c

FAY K-3rd grade students attending Taos International School who have taken both the beginning of the year and end of year assessments will grow in Spanish Language Reading skills as measured by Indicadores Dinamicos del Exito En La Lectura (IDEL) levels of proficiency.

Analysis. According to TIS analysis of progress towards indicator 2.c, “Out of 100% of K-3rd grade students who took both the beginning of year and end of year assessment, 46% grew by one performance tier level to the next” (Uploaded web-EPSS school-generated document entitled, ‘Mission-Specific Indicators assessment data 7.17.17’). The school rated this indicator “Falls Far Below Standard.” The PED team concurs with this rating. The school reported on this goal in prior years, but did not include this reporting in the renewal application. In the prior year reports, the school provided data by grade level. The school notes 83% of K students, 74% of 1st grade students, and 43% of 2nd grade students moved by one performance level. This data appears to indicate that 2017 data is lower than the 2016 performance data.

Again, improvement actions described in the narrative are the same set of “adult actions” (Renewal Application, p. 15) for all 4 indicators regardless of whether or not they were previously met. See analysis from prior sections which demonstrate adult actions described in the Renewal Application to improve student outcomes were observed inconsistently, and were not supported by an analysis of root causes. Further, the actions appeared unsystematic and the actions are not specific to any given indicator or targeted to improving performance in any specific area.

Mission-Specific Indicator 2.d

All Full Academic Year (FAY) students (K-8) attending Taos International School who have taken both the beginning of the year and end of year assessments will grow from one performance level to the next highest performance level in Spanish Language Proficiency as measured by Woodcock Munoz Levels of Cognitive-Academic Language Proficiency (CALP).

WoodCock Muñoz CALP levels of Spanish proficiency are based on a scale of 1 through 6.

- 1 – Negligible*
- 2 – Very Limited*
- 3 – Limited*
- 3.5 – Limited to Fluent*
- 4 – Fluent*
- 4.5 – Fluent to Advanced*
- 5 – Advanced*
- 6 – Very Advanced*

Analysis. According to TIS “65% of students in K-5 grades, who took beginning and end of year assessments improved in Cognitive-Academic Language CALP scores, from one performance level to the next” during the 2016-2017 school year while “73% of students in 6th-8th” moved from one level to the next. Again, the data reported for 2015-2016 was reported in a different format, which makes comparison difficult. That data indicates that in 2015-2016, 93% of K students, 86% of 1st grade students, and 43% of 2nd grade students moved from one level to the next. It appears there was likely a decline overall from 2015-2016 to 2016-2017. For 2015-2016 56% of 6th grade students and 71% of 7th grade students moved one grade level. There appears to have been a slight improvement for these grade levels.

Once again, the same set of “*adult actions*” (Renewal Application, p. 15) as was the case for the 3 other indicators (regardless of whether or not the school was meeting each one) was cited as cause for student success in Spanish language acquisition. The PED was unable to verify purported results through desktop monitoring (i.e., web-EPSS) or during the site visit.

Summary: School Specific Charter Goals

It is evident in the narrative and through the site visit that the school’s failures to meet most of its mission-specific indicators specifically those focused on reading and math is a result of its lack of systematic and targeted approach to improving low student achievement (e.g., as pointed out in some of the NWEA and I-Station results presented by the school during the 2016-2017 school year and prior). According to the school, the same activities have and will continue to be used to address each indicator, with no specific analysis of root causes. This is also demonstrated by the school’s recent attempt to submit an approvable NMDASH improvement plan. The plan was returned to the school with 7 out of 16 areas being rated “limited progress.” The school has made general attempts to improve performance, but improvement efforts appear to be in the beginning stages, are being implemented inconsistently, and do not appear to be targeted to improve specific areas of weakness and need.

School Goals

TIS failed to meet key mission-specific goals over the years.

TIS acknowledged failure in meeting at least one indicator and did not provide evidence of systematic and targeted efforts to improve low student performance for the other indicators.

The school does not have a demonstrated record of meeting all standards in each of the years of the contract term and the narrative described “*general improvement actions to improve performance and outcomes*” (p. 15). Consequently, the rating for the **Part B, Section 1b, School Specific Charter Goals, is “Approaching Progress.”**

SECTION 2. FINANCIAL COMPLIANCE FRAMEWORK

Audit. TIS described audit findings it received in FY15 and FY16 and improvement efforts it had taken to avoid repeat findings. During the site visit on October 25, 2017, the PED site visit team attempted to validated implementation and oversight of improvement efforts. During the governing board member interview portion of the visit, the PED team asked the governing board “*steps*” the school has taken to remedy past audit findings. It appeared the board members who were interviewed were unaware of such findings. Specifically, one governing board member stated, “[The audit committee hasn’t] *met this year. Last October [2016] we met for the exit meeting. We did not have any audit findings.*” The audit committee members and board as a whole do not appear to be fulfilling their duty to oversee the financial operations of the school and do not appear to have an understanding of their responsibilities in relation to audits and audit findings.

The PED team also asked the board members if they had been updated by the school administration (related to a previous finding) on how it would ensure Retiree Health Care (RHC) withholdings and contributions take place for employees entitled to Educational Retirement Board (ERB). One board member responded, “*If I recall. It was reported to us that the employee ‘opted-out’ [of RHC even though she/he was entitled to ERB benefits].*” Such contribution is not optional according to state statute (see NM Stat § 10-7C-15) raising questions of the governing body’s due diligence through its audit committee in overseeing school leadership in regards to financial audits and disseminating critical information to other board members.

Although the school presented a travel and reimbursement policy that appeared consistent with state law and rule as part of its remedy for an audit finding that occurred in FY15 (see NM Stat § 10-8-4[K][2] and NMAC 2.42.2.11[B][1]), a review of the most recent travel reimbursement for an employee revealed lack of supporting documents that support compliance (e.g., requisition, purchase order, receipts,

certified mileage chart/odometer reading by the traveler). Documentation provided to demonstrate compliance with travel protocols seemed to indicate the school provided reimbursement for \$90 worth of meals when there were only receipts to support \$50. Additional documentation was provided later to demonstrate sufficient support, but the concern remained that documentation was not readily available and presented correctly when requested. As stated earlier no map or certification of odometer mileage was provided.

Audit findings related to background checks appear not to have been corrected. The school indicated that prior to signing any contract, the school will have background checks in school files. Several files were reviewed where the background check in the file was dated after the contract was signed *and* after the first day of school. The school does not appear to be complying with its own policies to correct this audit finding.

Although the narrative in the appendix provided by the school described improvement actions, verification of their implementation could not be confirmed for the specific audit findings mentioned above. Consequently, the rating for the **Financial Compliance, Subsection a, is "Failing to Demonstrate Progress."**

Financial Performance Framework. During the 2014-2015, 2015-2016 and 2016-2017 school years, TIS received the rating "Meets Standard" for all areas in the Financial Performance Framework. Consequently, the rating for the **Financial Compliance, Subsection b, is "Meets the Standard."**

Board of Finance. TIS's Board of Finance was never suspended during the term of its contract. Consequently, the rating for the **Financial Compliance, Subsection c, is "Meets the Standard."**

SECTION 3. CONTRACTUAL, ORGANIZATIONAL, AND GOVERNANCE RESPONSIBILITIES

Charter Material Terms. The school's narrative described implementation of a number of activities related to its educational program such as:

...students are exposed to a variety of techniques and strategies to understand content, and multiple opportunities to participate through inquiry-based learning. Students 'will acquire languages and the academic and social skills necessary to function in our local, national and international communities' (Renewal Application, p. 28)

The narrative also re-iterated teacher focused terms such as professional development in "English Language Learner [ELL] instruction, and International Baccalaureate certification" (p. 28). The Public Education Department (PED) team observed evidence of professional development trainings on the topic of International Baccalaureate (IB) through agendas and sign-in sheets as well as IB materials in teacher binders during classroom observations. The school's narrative did not include a description of actions it will take to address specific failures in meet materials terms (e.g., implementation of 'instructional strategies...aligned to the Common Core Standards,' 'the study of 'Mandarin Chinese,' and enrichment offerings such as soccer, gymnastics, and taekwondo) since these areas were not identified as compliance concerns. Thorough a review of the schedule, discussions with students, and discussions with parents and teachers, PED was able to verify the implementation of these elements of the educational program. The PED team (although not mentioned in the narrative as an area of concern) was also able, through discussions with parents and school leadership, to verify implementation of the School Advisory Council (SAC). PED was not able to clearly verify that the SAC allows parents to

“participate in the site-based management structure of the school” as it appears the SAC was primarily concerned with fundraising rather than management.

The school has not yet been approved by the IB program to *“implement the International Baccalaureate (IB) Primary and Middle Years Programmes.”* Thus, this part of the material terms is not yet verified. The school has submitted applications for approval, but approval has not yet been granted. However, it did not make mention of such efforts in the Renewal Application itself. Consequently, the rating for the **Charter Material Terms, Subsection a, is “Approaching Progress.”**

Organizational Performance Framework. TIS did not provide a narrative to describe efforts it has made and/or will continue to make in order to improve on items identified as *“Does Not Meet Standard”* or *“Falls Far Below Standard”* in the Organizational Performance Framework section of its 2015-2016 and 2016-2017 Performance Framework as identified in web-EPSS reports. An example of an item rated below standard is as follows:

- In 2016-2017, Section II-A.01: Educational Plan—the PED team rated the indicator *“Does Not Meet Standard’ because the school failed to implement the program during the 2016-2017 school year [i.e., shortage in instructional hours based on the Performance Framework].”*

The school’s response in this section was *“N/A.”* Consequently, the rating for the **Organizational Performance Framework, Subsection b, is “Failing to Demonstrate Progress.”**

However, PED does note that the school submitted an amendment request to correct the instructional hours concern.

Governance Responsibilities. TIS described the roles and responsibilities of its governing board members (e.g., *‘the president shall sign legal documents as required by law and other duties as given by the GC’* and *‘the Secretary keeps minutes of GC meetings, policies, and posts notices’* p. 30). The school further states that it *“has met governance responsibilities during the term of the contract.”* However, this is inconsistent with PED records that indicate only one board member fulfilled training requirements during the 2016-2017 school year. Specifically, *“PED has not received records for other governing board members of the school. TIS did not submit any training hours for FY2016”* (Renewal Application, Part A, p.2).

TIS stated that the school *“has an Audit committee, whose purpose is to keep the GC apprised of the school finance affairs”* (p. 22). However, at the site visit on October 25, 2017, board members did not appear *“apprised”* of past audit findings as evidenced by one board member’s statement: *“We haven’t met this year....Last October [2016] we met for the exit meeting. We had a completely clean audit.”* Consequently, the rating for the **Organizational Performance Framework, Subsection c, is “Failing to Demonstrate Progress.”**

PART C: FINANCIAL STATEMENT

The school left Section IX of the *Charter Renewal Application Budget Analysis* form blank. A response was required as per NMAC 6.19.8.10 which states that governing bodies of charter schools must prioritize *“resources of a public school rated D or F toward proven programs and methods linked to improved student achievement.”* TIS failed to describe how it has and will continue to target resources to improve student achievement given their low school grades during the past 3 years: D (2015), D (2016), and F (2017). As a result, it appeared that the school is not meeting its statutory requirement under NMSA 22-2E-4 to *“prioritize[e] resources of a public school rated D or F toward proven programs and*

methods linked to improved student achievement until the public school earns a grade of C or better for two consecutive years.”

PART D: PETITION OF SUPPORT

TIS provided both petitions that appear to reach at least 65% (employees) and 75% (households).

PART E: DESCRIPTION OF THE CHARTER SCHOOL FACILITIES AND ASSURANCES

The school provided a narrative description of its facilities. The school also attached required documents (e.g., Public Schools Facilities Authority [PSFA] letter and E Occupancy certificate) that appear compliant with Section 22-8B-4.2 NMSA 1978.

PART F: AMENDMENT REQUESTS

The school submitted one amendment. Analysis of the amendment request and a recommendation from the PED will be provided on December 4, 2017.