

STATE OF NEW MEXICO PUBLIC EDUCATION DEPARTMENT 300 DON GASPAR SANTA FE, NEW MEXICO 87501-2786 Telephone (505) 827-5800 <u>www.ped.state.nm.us</u>

HANNA SKANDERA SECRETARY-DESIGNATE OF EDUCATION SUSANA MARTINEZ Governor

December 13, 2012

Dear Public Education Commissioners:

Enclosed is the Final 2012 Charter School Application Final Recommendation and Evaluation for Cottonwood Classical Charter School applying for a renewal state charter in Albuquerque. Please know that the staff at the Charter Schools Division analyzed the renewal applications, reviewed past performance of the school and gave full consideration to the information gathered in this process.

The Charter Schools Division (CSD) has provided prior evidence in their preliminary analysis and the charter school team has gathered to analyze the data and make the enclosed recommendation.

Thank you all for your hard work and dedication to ensure that New Mexico's Charter Schools represent the best of alternative and innovative options for parents and students.

Sincerely,

Jony beiliz

Tony Gerlicz Director Options for Parents: Charter Schools Division

I. Recommendation

Approve: X

Overall the application is complete and adequate. The Cottonwood Classical Charter School presented no material violations, had no fiscal management improprieties, and had no violation of any provisions of law. The performance component of the school's report card indicates the school achieved at an A level with strong showings in all component areas of the report card. The Charter School Division of the Public Education Department has concluded that the Cottonwood Classical should be approved with no conditions. The Charter School Division applauds Cottonwood Classical not only for its fine renewal application but for the innovation and success it is providing its students.

Approve with Conditions: Overall the application is complete and adequate.

PROPOSED CONDITIONS

The Applicant will negotiate a renewal contract with the Public Education Commission pursuant to 22-8B-9.1:

1. N/A

Deny:

Overall, the application demonstrates that the school has:

- (1) presented one or more material violations of the conditions, standards, or procedures set forth in the charter;
- (2) not met or is not making substantial progress toward achievement of the PED's minimum educational standards or student performance standards identified in the charter application;
- (3) has not met generally accepted standards of fiscal management;
- (4) has violated a provision of the law from which the state-chartered charter school was not specifically exempted.

By:

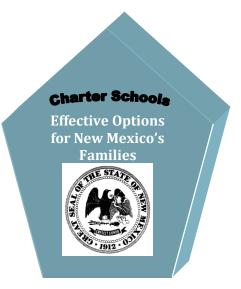
Jony berliz

Tony Gerlicz Director **OPTIONS FOR PARENTS – CHARTER SCHOOLS DIVISION**

New Mexico Public Education Department Options for Parents: Charter Schools Division

Cottonwood Classical Preparatory School's Response to Renewal Analysis

2012 State Charter Renewal Application Analysis For the New Mexico Public Education Commission



State Charter Renewal Application Evaluation Standards

In the state of New Mexico, the <u>Charter Schools Act</u>, <u>Section 22-8B-1 NMSA 1978</u>, governs the application and review process for charter schools seeking renewal at the end of their charter term. This statute also includes the four reasons for non-renewal of a school's charter. They are referenced here.

- Paragraph 1 of Subsection F of Section 22-8B-12 NMSA 1978 states that charter may be suspended, revoked, or not renewed by the chartering authority if the chartering authority determines that the charter school...committed a material violation of any of the conditions, standards, or procedures set forth in the charter.
- Paragraph 2 of Subsection F of Section 22-8B-12 NMSA 1978 states that a charter may be suspended, revoked, or not renewed by the chartering authority if the chartering authority determines that the charter school... failed to meet or make substantial progress toward achievement of the department's minimum educational standards or student performance standards identified in the charter application.
- Paragraph 3 of Subsection F of Section 22-8B-12 NMSA 1978 states that a charter may be suspended, revoked, or not renewed by the chartering authority if the chartering authority determines that the charter school...**failed to meet generally accepted standards of fiscal management**.
- Paragraph 2 of Subsection F of Section 22-8B-12 NMSA 1978 states that a charter may be suspended, revoked, or not renewed by the chartering authority if the chartering authority determines that the charter school...violated any provision of law from which the charter school was not specifically exempted.

Based on the completed renewal application, analysis from the Charter Schools Division (CSD) staff, status reports provided by the Public Education Department's (PED) divisions and bureaus, and, if applicable, the local school district, the CSD will make a recommendation to the Public Education Commission (PEC) regarding renewal of a school's charter. The following questions guide the CSD's recommendation regarding renewal and are based upon the four reasons that a chartering authority must determine a charter school has violated in order to refuse to renew a charter.

Has the school committed a material violation of any of the conditions, standards, or procedures set forth in the charter?

The school's charter defines the terms under which it proposes to operate and defines the measurable goals that the school agreed to meet. The CSD will analyze the evidence presented in the report from the school's current chartering authority regarding their determination of whether the school has committed a material violation of its charter.

Has the school failed to meet or make substantial progress toward achievement of the PED's minimum educational standards or student performance standards identified in the charter application?

The CSD will examine student achievement data on required state tests and on other measures set forth in the preliminary renewal analysis and reflected in Part A of the Renewal Application.

Has the school failed to meet generally accepted standards of fiscal management?

The CSD will rely on documentary evidence based on the reports from the PED's School Budget and Finance Analysis Bureau and the Audit and Accounting Bureau with regard to whether the school has met generally accepted standards of fiscal management.

Has the school violated any provision of law from which the state-chartered charter school was not specifically exempted?

The CSD will rely on documentary evidence gathered by the CSD staff during the term of the school's charter to determine if the school has compiled a record of substantial compliance with applicable state and federal laws and regulations, including, but not limited to, submitting items to its chartering authority in a timely manner.

Executive Summary & School Demographics

from the Renewal Application

Please include charter school's current authorizer, year the school charter was initially granted, and how many terms the school's charter has been renewed.

Statistics:

Cottonwood Classical Preparatory School (CCPS) is a state-authorized charter school in the Los Ranchos area of Albuquerque, NM. The charter was approved in January 2008 for the first time and its charter expires on June 30, 2013. The school serves grades 6-12 and is authorized to offer the International Baccalaureate Program to their 11th and 12th graders. Their total enrollment, according to the school's renewal application was 447 in 2011-2012; at the site visit the school confirmed that their 2012 first reporting period (40-day count) for enrollment was 542 with a waiting list in every grade. This enrollment has increasingly grown over the years starting with 140 total students in 08-09. This past June (6-27-12) the Public Education Commission (PEC) approved the school's request to amend their enrollment cap of 500 to 600 students. Using data from 2011-2012, 63.6% of the students are Caucasian, 28.4% are Hispanic, 2.9% are African American, 4.2% are Asian/Pacific, .9% are Native American, 4.4% are economically disadvantaged, 5.8% are students with disabilities, and .7% are English Language Learners. There is such a strong interest in this school that the CCPS Governing Council is currently exploring facilities which would possibly allow the school to expand even more.

Mission/Vision:

As written in the mission statement section of the original charter Cottonwood Classical Preparatory School seeks to accomplish the following:

The school's vision is to offer a challenging curriculum for all learners so that they can access any type of post-secondary opportunity whether employment, college, or technical school. By meeting individual needs and addressing different learning styles, CCPS will produce a diverse and sensitive population of Renaissance learners who have a broad knowledge base about a variety of subjects and will be able to use newly acquired knowledge in creative and innovative ways. Because of imbedded technology in the CCPS curriculum, the students will be prepared to contribute to and interact with a global economy.

CCPS will produce socially and emotionally well-rounded citizens who will seize opportunities to give back to the community. CCPS will have a positive school culture which will stress personalization and relationships. Each student will have an adult advocate who will help them understand they have a responsibility to be active and engaged participants in their environment. The school's learning community will be positively affected by interaction with parents as well as community groups, city agencies, nonprofit and for-profit organizations, and other like-minded schools.

CCPS students will actively engage in world-class curriculum through the International Baccalaureate (IB) program as well as interactive seminars and coached projects, and will learn through relevant feedback. Through experiential opportunities, CCPS students will wrestle with real-life problem solving while honing their critical-thinking skills. Students will communicate and interact nationally and internationally to solve issues that affect global communities. Therefore, Cottonwood Classical Preparatory School will strive to educate the whole child for the whole world.

Renewal Site Visit:

During the Renewal Site Visit and spending time with the CCPS school leaders, it was clear that the school has accomplished what it set out to do. Currently, CCPS is the only public high school in New Mexico to offer the IB diploma program. During the visit, the CSD staff noted that the facilities were well-maintained and inviting. The students and staff were engaged and eager to talk about their school.

I.A. Material Violations

The Charter School Act provides:

A charter may be suspended, revoked, or not renewed by the chartering authority if the chartering authority determines that the charter school...committed a material violation of any of the conditions, standards or procedures set forth in the charter, 22-8B-12F (1) NMSA 1978.

The school's charter defines the terms under which it proposes to operate and defines the measurable goals the school pledges to meet. The review team has analyzed the evidence provided by both the charter school and the school's current authorizer (the PEC or the school district) with regard to material violations.

CSD Analysis of Material Violations

No material violations were noted.

Applicant Response to the Analysis of Material Violations

The School is in agreement that it has not committed any material violations of any of the conditions, standards, or procedures set forth in the charter.

I.B. Achievement

The Charter School Act provides:

A charter may be suspended, revoked, or not renewed by the chartering authority if the chartering authority determines that the charter school...failed to meet or make substantial progress toward achievement of the department's minimum educational standards or student performance standards identified in the charter application, 22-8B-12F (2) NMSA 1978.

The Charter Schools Division relied on school and PED reports of NMSBA data, and evidence provided by both the charter school and reports from the school's current authorizer (the PEC or the school district) for other academic performance data, data on other student performance standards, and other school goals/performance standards that were identified in the current charter.

I.B.1. SCHOOL ACCOUNTABILITY REPORTS DATA (NMSBA School Summary – All Students)

CSD Analysis of Achievement: School Accountability NMSBA Reports Data						
 A note from the Charter Schools Division (CSD): The Renewal Application Tool Kit this year is a transitional document for several reasons; as a result, when reading the Renewal Application Analyses, the following information must be considered. The schools up for renewal will be the first charter schools to negotiate a contract with the Public Education Commission (PEC), as required by Senate Bill 446 (SB446). While the CSD used the charter schools' currently approved performance goals to analyze the schools' progress, these goals will inevitably change as the schools move into their next charter term. During the five years of these schools' current charter term, the Public Education Department (PED) has implemented a new grading system, described in the state's School Grading Report. With this grading system come data to consider that differ slightly from what the schools have traditionally been asked to report regarding student proficiency and performance. For example, Adequate Yearly Progress (AYP) data always reported the performance of Full Academic Year (FAY) students, which is about 80% of students. The School Grading Report, which uses three years' worth of data, calculates the performance of all students on the Standards Based Assessment (SBA), whether or not those students 						
 have been at the school for a full year. Beyond proficiency percentages, the State Grading Report examines schools' performance in a variety of components, 						

such as Current Standing, School Growth, Opportunity to Learn, Graduation Rates, etc. These components provide the PEC with multiple ways to understand schools' strengths and challenges.

In light of these facts the CSD's analyses used both the data provided by the schools in their Renewal Application Kits, as well as the data that is now more efficiently collected and available to the PED, particularly, the school data available in the School Grading Report. These reports offer a more nuanced picture of a school's strengths and weaknesses beyond the single lens of proficiency rates.

CCPS Application:

The Renewal Application for Cottonwood Classical Preparatory Academy includes percentages of proficiency from the two accountability reports referred to in the Renewal Application Kit. The school does highlight the fact that the percentages in these two different reports do not match. Regardless of which data source is used, the school has met their Annual Measurable Objective (AMO) each year in both math and reading, save one data point—the percent proficient in Math for 2011-12. In addition, observation of both data sources shows that the school has increased the percentage proficient each year since its opening.

School Grading Report:

On the School's Grading Report the school got an overall grade of an A, an A in Current Standing, a B in School Growth of Highest Performing Students, a B in School Growth of Lowest Performing Students, and a B in Opportunity to Learn. The school's Graduation and College and Career Readiness (CCR) sections were not factored in this Report as the School "was not open all years of the Cohort of 2011. The calculation of their grade was adjusted to use only non-cohort indicators, eliminating CCR and Graduation." However, the school does have a lot of impressive results regarding these components and those are discussed more fully below. Finally, the school received.5 in Bonus Points for improvement in habitual truancy rates.

While not all information included in the *School Grading Report* is factored into a school's final grade, the report does provide supplemental details that are worth noting. When examining CCPS's *School Grading Report* more closely, under *Similar Schools/School Rank* the school will soon be recognized by the Assessment and Accountability Bureau as one of the top five schools in their ranking next to 30 plus schools identified as having comparable populations. In *Current Standing* they are either ranked 2 or 3 in all categories: *ELL, SWD, Ethnicity, ED, Mobility,* and *Composite.* In *School Growth* of their *Highest 75%* they are 3, 4, or 5 in all of these categories again. In *School Growth* of their *Lowest 25%* they are ranked third among schools with comparable populations in *ELL*, and in *Opportunity to Learn* they are ranked third among schools with comparable populations for *ELL.* For more information, please see the chart below.

Similar Schools While statewide comparisons are helpful, schools may want to see how they rank next to their peers that have similar students and settings. The figures below show how your school contrasts with other schools in the state that are most like it in student characteristics.

Schools are grouped into categories that have similar proportions of English language learners (ELL), students with disabilities (SWD), ethnicities, economically disadvantaged (ED), and mobile students. Different schools are in each category set. A composite score incorporates all categories into a general measure of at-risk students.

	ELL	SWD	Ethnicity	ED	Mobility	Composite
Current Standing	2 (26)	3 (47)	2 (47)	3 (47)	2 (47)	3 (47)
School Growth, Highest 75%	4 (26)	5 (47)	4 (47)	5 (47)	3 (47)	5 (47)
School Growth, Lowest 25%	3 (26)	13 (47)	9 (47)	10 (47)	12 (47)	6 (47)
Opportunity to Learn	3 (26)	14 (47)	16 (47)	8 (47)	8 (47)	11 (47)
Graduation	- (20)	- (39)	- (41)	- (34)	- (41)	- (36)
Career College Readiness	- (20)	- (41)	- (41)	- (34)	- (41)	- (36)
	1 1	1 1	I I	1 1	1 1	1 1

School Rank

The first number shows the school's rank (1= highest, most points) within their category of similar schools. The second number in parentheses shows the total number of schools that were ranked in that category.

According to their *School Growth Targets*, CCPS makes or exceeds their target in every subpopulation except American Indian in Reading and Economically Disadvantaged and Students with Disabilities in Math.

Regarding Participation in State Assessments the school has always been between 99%-100% for the past three years.

Finally regarding the *School History* presented in the *School Grade Report*, the school has increased their overall student proficiency every year that they have been open in both Math and Reading.

For a more detailed look at the School Grading Report for CCPS please use the following link: <u>http://webapp2.ped.state.nm.us/SchoolData/docs/1112/SchoolGrading/502_001_COTTONWOOD_CLASSICAL_PREP_C</u> <u>HARTER_COTTONWOOD_CLASSICAL_PREPARATORY_CHARTER_SG2012_10-16.pdf</u>

Applicant Response to the Analysis of NMSBA Reports Data

The School concurs with the NMSBA data reporting and analysis. The school is encouraged that the data has remained as strong as it has given the considerable growth that has occurred during the initial charter term.

In the future, CCPS believes that the data that comes from the College and Career Readiness will only help the school maintain this indicator of successfully educating the students who are admitted through the lottery enrollment process. It is difficult to maintain the levels of academic quality that the school has maintained while growing from a small population of 140 students to a comprehensive school that now enrolls 542. As the school continues to demonstrate academic excellence, we anticipate a greater demand from the public to attend our school.

I.B.2. STUDENT ACADEMIC PERFORMANCE STANDARDS IDENTIFIED IN THE CHARTER APPLICATION (Short-cycle assessments and/or other standards-based instruments)

CSD Analysis Of Achievement: Student Academic Performance Standards Identified In The Charter Application (Short-cycle assessments and/or other standards-based instruments)

Goals:

In their renewal application for this section, Cottonwood Classical Preparatory School (CCPS) provided one goal regarding Student Academic Performance. The goal was written in the renewal application as: "All Cottonwood students will perform at the proficient level on the NMSBA. CCPS will annually make Adequate Yearly Progress (AYP) as defined by the NMPED on the NMSBA." Due to the fact that there was a lack of clarity about the goals of the school, this topic was discussed at the site visit. The school confirmed that their goals are as follows:

All Cottonwood Classical Preparatory School students will perform at the proficient level on the New Mexico Standards Based Assessment (SBA). As our starting point, seventy-five percent of Cottonwood Classical Preparatory School Students will achieve proficiency on the SBA, of those who are proficient; ten percent of CCPS students will achieve advanced proficiency on the SBA. Measurement: CCPS will annually make Adequate Yearly Progress (AYP) as defined by the New Mexico Public Education Department in the Standards Based Assessment (SBA).

NMSBA:

The school always met AYP.

According to the goal as written, the school did not meet the goal of "all" students making proficiency; nor did they always make the goal set as their starting point which is 75%. The school did always demonstrate a range of student proficiency however between 50% and 100% in both subjects. By investigating further, the school overall demonstrates increased improvement and academic growth of their students.

According to what is provided on page 14 of the Renewal Application, the school has continuously improved the proficiency rates in both reading and math (from year one to year four 58.5% to 66% in math and 71.3% to 80.7% in reading). Regarding the AYP data provided on page 15, which examines the proficiency by grade level, in 6th grade there has been growth in reading; in math there was less growth. For 7th grade it appears that the school has gone down significantly in

reading but increased proficiency in math. For eighth grade, the school shows growth between years 1 and 2 in reading and math, but then a drop after year 2 (e.g., 100% to 74.1%). For 11th grade it appears that there is a slight drop in reading but some growth in math. *When examining these data, it is important to note that these are different sets of students.*

Using the data provided to follow individual classes or "pseudo-cohorts" (assuming that the classes presented are primarily made up of the same students), it appears, for the most part, that once a student is in CCPS, he or she continues to grow. The sixth grade class in year 1 had a 60% proficiency in reading and a 58% proficiency in math. Following this pseudo -cohort of students in the second year, it can be observed that this cohort continued improving by year 2 and 3 (75.4% in Reading and 56.6% in math) and (75.9% in reading and 68.5% in math). Similarly, following the seventh grade in the same manner, the students grow 93% to 100% proficiency in reading and then 50% to 81.1% proficiency in math after being in enrolled at CCPS for two years.

School Grading Report:

For more information, the *School Grading Report* (which includes data on all students, not just Full Academic Year students as in AYP) shows that in reading their student proficiency has gone from 71.3% in 2009 and continuously increased all the way up to 85.5% in 2012. For math they have also shown growth. In 2009 their proficiency for all students was 58.5% and by 2012 it was 73.1%. At the site visit, the school discussed small variances and fluctuations in their proficiency rates and attributed those to large increases in their population and diversity especially in the seventh and eighth grades in year 2011.

Cottonwood Classical Preparatory School will have a 90% graduation rate; CCPS will be a gateway for its students to postsecondary education. Seventy-five percent of graduating seniors will be accepted into 2 or 4 year postsecondary institutions, and will be measured by documentation of college or university acceptance letters.

The school has met this goal and exceeded the measurement for the two years that it had graduating classes. In 2010-2011, five out of five seniors (100%) were accepted into 4-year colleges and in 2011-2012, 17 out of 18 seniors (94%) were accepted into four-year colleges. One student in 2011-12 did not apply to college but chose to pursue the military.

In addition to these met goals, the renewal applicants explained during the site visit that all 11th and 12th graders must participate in the IB diploma programme. While students are not required to take the test, they are required to take the classes. This year, 22 out of 24 students have chosen to fully commit to IB. In addition to the IB test, the seniors also sign up to take Advanced Placement (AP) Tests and the school's foundation provides scholarships to those students who need it for these tests. The school confirmed that all 11th and 12th grade teachers have received, and continue to receive, IB training and that the entire staff is currently collaborating to ensure that their curriculum and classroom expectations in grades 6-10

align with what is expected of the upper grades for IB.

In addition, the school has several other measures in place to ensure that their students are prepared for colleges or careers. The renewal applicants explained that all juniors must sit for the PSAT and the school pays for it. All tenth graders take the PLAN and this class may also sit for the PSAT if they choose to do so. The school leaders confirmed that they have partnerships with UNM and CNM so that students may take advanced classes that are not provided in the IB diploma programme. All of these programs and procedures are highlighted as best practice under the College and Career Readiness section of the *School Grading Report*. As PED becomes more adept at gathering all necessary information to contribute to a school's grade, it can be predicted that this school will continue to score high as their CCR activities will be included in future School Grading Reports. Finally, renewal applicants also reported that they are developing a system for tracking their students' success after graduation.

CCPS will successfully offer an International Baccalaureate (IB) Diploma Programme to its 11th and 12th grade students; *CCPS* will successfully implement and track its Paideia model of pedagogy. Measurement: Approximately 65% of all instruction will be project and presentation based learning, approximately 25% of all instruction will be discussion based learning, the remaining 10% of learning will be didactic/lecture driven instruction.

CCPS was accredited to offer the IB programme diploma on April 6, 2010. At the site visit, the renewal applicants explained that they monitor the teachers' use of these methods during teacher evaluations. In addition, the administrators explained that they look at the school more holistically regarding this goal. For instance, the student may be getting more of the paideia method in a humanities class and less in a math class, but overall, the student receives the projected amount discussed in the goal. The school has been using a national Paideia trainer and this trainer has aligned his materials and training with Common Core State Standards.

All CCPS students will participate in service learning opportunities, each student must complete 15 hours of service with an approved service provider. Measurement: Number of hours logged by each student. These logs were kept updated by the student's advisor.

During the site visit, the school leaders confirmed that service learning is a required component of their school. The student must complete 150 hours of service upon graduation. The renewal applicants explained that in 6^{th} grade there is a class-advisory service learning project and as the student moves into the upper grades the service learning projects are individual. The school requires the students to complete portfolios recording their service learning. The applicants described an example where students started a garden and an outdoor classroom; they also emphasized the importance of ensuring that students see service as a lifelong commitment. Within the service learning program the school facilitates mentorships

between students and adults. When the students write their "extended essay" (a part of the service learning project), they are guided by a mentor. The applicants offered an example of students working at Sandia Lab over the summer.

From the information provided in the renewal application, there is evidence of this school's success. The site visit supplemented this success with further evidence, documentation and explanation.

Applicant Response to the Analysis Student Academic Performance Standards Identified In The Charter Application (Short-cycle assessments and/or other standards-based instruments)

The School is extremely pleased with the level of detail that the renewal site team provided when assessing the school's academic performance. While there are a few details that are not quite accurate, the overall assessment of the school's performance was consistent with the information that the school believes is substantive in nature and reflects the high level of performance that students at Cottonwood are producing.

Cottonwood Classical looks forward to negotiating the terms of the contract with the Public Education Commission moving forward and hopes that this kind of articulation will provide the clarity that will allow for CCPS to more clearly indicate the levels of success that are being demonstrated.

I.B.3. OTHER STUDENT PERFORMANCE STANDARDS IDENTIFIED IN THE CHARTER APPLICATION

CSD Analysis Of Achievement: Other Student Performance Standards Identified In The Charter Application

Under the section for "other student performance standards" the renewal applicant listed the goal for graduation as "Cottonwood Classical will have exceptional graduation rates. Cottonwood Classical will have a 90% graduation rate" (pp: 15-16). In the last two years, the school expanded to include 12th grade classes and those two graduating classes were small (6 seniors then 18 seniors), the school did achieve their goal of 90% graduation. This information is explained in more detail in the above section.

Applicant Response to the Analysis Other Student Performance Standards Identified In The Charter Application

CCPS is at a disadvantage, being a school in its initial charter term, with regard to the formula that the Public Education Department utilizes to calculate the high school graduation rate. Cottonwood is just now seeing the graduating class of students who entered during their freshman year and remained for a consistent four years to graduation. It is reassuring to see that the PED understands this dilemma with charter schools that have "phased in" grade levels over the course of their initial charter term and applauds their analysis regarding this issue.

I.B.4. OTHER ORGANIZATIONAL PERFORMANCE STANDARDS/SCHOOL GOALS IDENTIFIED IN THE CURRENT CHARTER (If Applicable)

CSD Analysis Of Achievement:

Other Organizational Performance Standards/School Goals Identified In The Current Charter

At the time the charter was approved an organizational goal was not a requirement.

Applicant Response to the Analysis Other Organizational Performance Standards/School Goals Identified In The Current Charter

Not applicable.

I.C. Fiscal Management

The Charter School Act provides:

A charter may be suspended, revoked, or not renewed by the chartering authority if the chartering authority determines that the charter school...failed to meet generally accepted standards of fiscal management, 22-8B-12F (3) NMSA 1978.

The Charter Schools Division has analyzed the evidence provided by the School Budget and Finance Analysis Bureau and the Audit and Accounting Bureau, the charter school authorizer (PEC or the school district), and the charter school with regard to generally accepted standards of fiscal management.

CSD Analysis of Fiscal Management

The school's report in the renewal application aligned with the information provided by the Budget Analysts and Audit Bureau at PED. CCPS had:

- Year 1: 5 findings
- Year 2: 5 findings
- Year 3: 4 findings

It appears that the school did not have any repeated mistakes.

Applicant Response to the Analysis of Fiscal Management

With regard to the management of the school's fiscal responsibilities, we believe that we have demonstrated a clear commitment to safeguarding public dollars well. The audit findings that CCPS has received over the course of the past four years have not risen to a level of "materiality," nor have the findings been repeated from one year to the next. As is the case with many public schools (charter and traditional) that choose to put the overwhelming majority of their resources into the classroom, we must figure out creative ways to provide the separation of duties necessary to meet the standards of fiscal management. CCPS has done so each year and still has maintained a pupil-teacher ratio that is among the lowest in the state of New Mexico.

I.D. Compliance Review

The Charter School Act provides:

A charter may be suspended, revoked, or not renewed by the chartering authority if the chartering authority determines that the charter school ... violated any provision of law from which the charter school was not specifically exempted. 22-8B-12F (4) NMSA 1978.

The Charter Schools Division relied on documentary evidence compiled during the term of the school's charter from the authorizer (PEC or the local district) to determine if the school has demonstrated a record of substantial compliance with applicable state and federal laws and regulations, including, but not limited to, submitting items to its authorizer in a timely manner.

CSD Analysis of Compliance Review

No compliance issues were identified.

Applicant Response to the Analysis of Compliance Review

CCPS agrees that we have demonstrated a record of substantial compliance with applicable state and federal laws and regulations.