

2010 CHARTER SCHOOL APPLICATION PRELIMINARY ANALYSIS

School Name: Trinity High School
Total Projected Enrollment: 160

Proposed Grades: 9-12
Review Date: 8/10/2010

I. TABLE OF CONTENTS – Not to be analyzed

II. APPLICATION COVER SHEET/NOTICE OF INTENT/ ABSTRACT – Not to be analyzed

III. STATEMENTS OF ASSURANCES/ASSURANCE THAT ALL GOVERNING BODY MEMBERS HAVE READ THE COMPLETED APPLICATION – Not to be analyzed

IV. CHARTER SCHOOL MISSION AND STATEMENT OF NEED

The Charter School Mission Statement should communicate the essence of the school to stakeholders and to the public and should provide the focal point to which all other sections of the school's plans align. In addition, the proposed charter school and its mission must be in the best interest of the students and community that it proposes to serve.

A Charter School Mission and Statement of Need section will be complete if it has addressed the following components:

- A **Mission Statement** that is clear and compelling and includes the following components:
 - Who the school seeks to serve;
 - What the school seeks to accomplish;
 - What methods the school will use.
- An explanation of **how the school will know if it is achieving its mission** that includes school level or organizational goals that are:
 - Measurable;
 - Directly support the Mission Statement;
 - Stated using the SMART Goal format.

(NOTE: Specific measurable student performance expectations [student goals] should be addressed in section IV, Educational Plan.)
- An **explanation of need** that describes how the proposed charter school is in the best interest of the students and community that it proposes to serve. This will include a demographic description of the student and community population within which the school will be located.

ANALYSIS: CHARTER SCHOOL MISSION AND STATEMENT OF NEED

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Mission Statement</u></p> <ul style="list-style-type: none"> Substantial concern is raised about the name of this school, “Trinity,” that implies many indicators that are in opposition with the school’s explanation that it “will not have any religious affiliation and will not proselytize or support any form of religion ...“ According to the online <i>Merriam-Webster Dictionary</i>, the definition of Trinity is cited to be “the unity of Father, Son, and Holy Spirit as three persons in one Godhead according to Christian dogma <u>and</u> (not capitalized) a group of three closely related persons or things ...” The application fails to refer to or demonstrate a clear focus on three specific components that are central to the overall plan for this school. The plan does state that it is using the Cristo Rey model; and further research about the Cristo Rey educational program model indicates it to be “a quality, Catholic, college-preparatory education to students from families of limited financial means.” “A Cristo Rey Network school shall meet the following standards. The school: <i>Standard one: Is explicitly Catholic in mission and enjoys Church approval.</i>” (This standard is 1 of 10.) Source: www.cristoreynetwork.org/start/mission_effectiveness.shtml. Throughout this application and within the mission statement, the school demonstrates a focus on “knowledge of morals and ethics” and “the study of morality and ethics” and philosophy. Significant information that is required about all academic subjects, expected student performance, and clear assessments are missing. Meaningful detail and important additional information is not provided which would allow for an understanding of who the school will serve, what the school will accomplish, and what methods the school will use. Specifically, components of the Mission Statement are difficult to discern amongst the extraneous explanations about school days, curriculum philosophy, religious affiliation, number of students, testing methods, measurable goals, and community involvement -- none of which are included within the Mission Statement as compelling components that communicate the essence of the school. <p><u>Achievement of Mission/Goals</u></p> <ul style="list-style-type: none"> Meaningful detail and important additional information is needed to make this section of the application complete; time-specific achievement dates are missing. Clear metrics, measures, and timelines to measure student success for these goals are needed for grades 9, 10, and 12; significant data is missing to address what data will be collected for these grades that are not tested as part of NMSBA. 	<p>Pages 2-3, online resources</p> <p>Pages 2, 16, 22-23</p> <p>Pages 2-6</p> <p>Pages 2-3</p> <p>Page 2</p>

<ul style="list-style-type: none"> • Significant detail and additional important information that specifically provide relevant research-based data to support the applicant’s claims of the proven success of the Cristo Rey model are missing. The application does not specifically identify any of the research that supports these stated conclusions. • The first three goals cited in this section are <u>student</u> goals, not school/organizational goals. 	<p>Page 5</p> <p>Pages 4-6</p>
<p><u>Explanation of Need</u></p>	
<ul style="list-style-type: none"> • This section lacks significant, meaningful detail and requires important additional information to be reasonably comprehensive regarding the student demographic data for the Española Valley. Dropout and student achievement rates for Española students are missing. The data provided is for all New Mexico students. Per the application prompt, “a demographic description of the <u>student</u> and community population within which the school will be located” is required. • Community and workforce/employment data is missing to help establish need and determine if the support framework for the proposed work experience program exists. 	<p>Pages 4-5</p>
<ul style="list-style-type: none"> • “The School is committed to forming a safe environment through ongoing monitoring and supplemental supervision for the students.” This was noted to be a priority for parents and the school, however, follow-through development and explanation details for who and how such a plan would be implemented are missing in the application. 	<p>Page 6</p>

CHARTER SCHOOL MISSION AND STATEMENT OF NEED SUMMARY

Please summarize your analysis of the Mission and Statement of Need section of the school’s application. Your summary should reflect your overall impression of the section as presented.

<p><u>Summary Analysis</u></p> <ul style="list-style-type: none"> • Clear indications and comments throughout the application suggest that this will be a sectarian (Catholic) school. This school’s chosen name (Trinity) and educational program model (Cristo Rey) blurs the line for separation of church and state. Research information and data provided on the Cristo Rey website coupled with the clear focus of teaching philosophy courses “in a values-centered education” (p. 22) and teaching ethics and morals/morality suggest that the basis for this educational program will be religious in nature. Further, throughout the application, a perceived lesser focus is noted on core academics and student performance. Significant information that is required about all academic subjects, expected student performance, and clear assessments are missing. • The Charter School Mission Statement should communicate the essence of the school to stakeholders and to the public and should provide the focal point to which all other sections of the school’s plans align. The lack of a strong, concise Mission Statement provides incomplete communication about the essence of the school and fails to provide the complete focal point to which all other sections of the school’s plan should align. Research-based data that would support the claims of the "proven success" of the proposed Cristo Rey model and the applicant’s

statement that, “There are no schools in northern New Mexico that offer both a comprehensive academic and career skills development program ...” are missing. Substantial concerns are raised for how the school will know it is achieving its mission because they have failed to provide clear and measurable organizational/school goals written as SMART goals.

- In addition, the proposed charter school and its mission must be in the best interest of the students and community that it proposes to serve. However, missing from this application is Española student/community demographic information and student achievement data. Also missing is higher education and workforce data that would support the feasibility of implementing the proposed work training experience.
- The applicant failed to follow the directions provided for compiling the contents of this application, starting with failure to cite page numbers for the section and subsection titles in the Table of Contents, addressing all prompts in the order requested within the application, failure to tab the indices and number all pages, and ending with no Bibliography of sources/resources/data cited. Poor “cut and paste” inserts throughout the application resulted in poor readability, inclusion of irrelevant and disjointed information, and incomplete information. Numerous spelling and grammatical errors are also found throughout the entire document.

V. EDUCATIONAL PLAN

The educational plan should describe who the school expects to serve; what the students will achieve; how they will achieve it; and how the school will evaluate performance. It should provide a clear picture of what a student who attends the school will experience in terms of educational climate, structure, materials, schedule, assessment and outcomes.

A. CURRICULUM FRAMEWORK

The New Mexico Content Standards, Benchmarks and Performance Standards provide the content requirements and expectations for students in all public schools. The description of the curriculum should provide a sense not only of what the school will teach but also of how and why. (*NOTE: Refer to the Glossary of Terms Used in the Application, last two pages of this document, to assist in the analysis of this section.*)

A description of the Curriculum Framework will be complete if it has addressed the following components:

1. Philosophy and Approach to Instruction:

- A description of the educational philosophy and curricular approach of the proposed school.
- A description of why the particular educational philosophy and/or approach were selected.

- Documentation, research, and/or a rationale that supports the educational philosophy and curricular approach.
- An explanation of why the educational philosophy and/or approach is/are likely to result in improved educational performance of students.
- A description of how the educational philosophy and/or approach align with the school’s mission and student needs.

2. Description of the Curriculum

- **If the curriculum has already been selected/developed:** A detailed description of the curriculum that includes a scope and sequence.
- **If the curriculum has yet to be developed:** A description of the proposed curriculum and a specific plan for its development that will include a scope and sequence. The development plan should include a description of the process, a timeline, and resources (including staffing) to be utilized.

3. Alignment with NM Standards

- A copy of the alignment document if it was completed, **OR**
- If the alignment has not been completed, a description of the process and a specific timeline to be used for aligning the curriculum with the New Mexico Standards.

4. Strategies and Methods:

- A description of the strategies and methods to be used in delivering the curriculum.
- An explanation of how the curriculum will address students’ needs and assist students in reaching the NM Standards. (*NOTE: Students with special needs, including students who require bilingual education, special education or are limited English proficient, should be addressed in Subsection D: Special Populations*)
- A descriptive example of the curricular strategies and methods in action in the classroom.
- A description of professional development that may be necessary for implementation of the strategies and methods to be used in delivering the curriculum.

ANALYSIS: EDUCATIONAL PHILOSOPHY AND APPROACH TO INSTRUCTION

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Philosophy and Approach to Instruction</u></p> <ul style="list-style-type: none"> • This section raises substantial concern for the applicant’s understanding of the school’s philosophy and curricular approach to instruction and presents incomplete information in this section. The applicant confuses educational philosophy and curricular approach with instructional delivery approaches, methods, and tools. • Documentation, research, and/or a rationale that supports the educational philosophy and curricular approach are missing. Also missing are an explanation and specific information detailing why the educational philosophy and approach are likely to result in improved educational performance of students in this school. Page 13 presents limited information that "the 	<p>Pages 8-15</p> <p>Pages 2, 8, 13</p>

<p>curriculum was selected based on proven and previously implemented programs. . ." and cites reading and math improvement data/information for freshman and sophomores found in the Cristo Rey Report Card, July 2009. This report card lacks information regarding overall student achievement for all grades 9-12 and fails to compare student similarities and rationale for how and why this same model will work for this proposed school. Also missing is a description of how the educational philosophy and approach aligns with the school's mission and student needs. A clear focus on all core academic subjects is missing, and the plan fails to provide curricular information for delivering music, PE, and elective classes other than Philosophy.</p> <ul style="list-style-type: none"> • The graduation rates are cited to be "70% or higher." in this section. This conflicts with the 99% rate cited in the mission section on page 2. • Significant detail and important additional information are missing regarding what 9th grade students will be doing on Friday -- the "student work day" for students in grades 10-12. Further, it is unclear which teachers will be available to provide instruction on these Fridays when professional development, collaboration, and work site visits are also cited to occur during this same day. • Also missing is specific detail to explain the school's alternative plans for any student who is ineligible due to age, does not have a job, can't keep a job, gets dismissed from a job or is otherwise unable to participate in the professional work program at any point of his/her educational program. Supervision and staffing for this program is not provided. • The application indicates that "staff members will act as advisors who help the students make a plan that outlines their career and future. The counselor will meet with the students individually twice a year to check on their progress and update the plan." Clarification is needed to determine to which plan the school is referring. • Substantial concern is raised that "Community members will be involved in all levels of School activities, including . . . <u>auxiliary teaching</u> . . ." Classes must be taught by HQT who are appropriately licensed and certified per NM statutory requirements. <p><u>Description of the Curriculum</u></p> <ul style="list-style-type: none"> • This incomplete section raises substantial concerns about the applicant's understanding of curriculum development and implementation (including instructional delivery). Overall, this section lacks significant detail and important additional information to be reasonably comprehensive in its curricular philosophy/approach to education and demonstrates lack of preparation. <u>Missing Items are:</u> <ul style="list-style-type: none"> ➤ A detailed description of the proposed curriculum and a 	<p>Page 8</p> <p>Page 13</p> <p>Page 13</p> <p>Page 12</p> <p>Page 13</p> <p>Page 15</p>
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<p><u>specific</u> plan for its development that will include a scope and sequence <u>and</u> a description of the process and timeline. Elective courses, other than Philosophy, are missing from this section.</p> <ul style="list-style-type: none"> ➤ A description of the educational philosophy and curricular approach to be implemented; ➤ A description of why the School’s approach and philosophy was selected; and ➤ An explanation of why the educational philosophy and approach are likely to result in improved educational performance of students is missing. <ul style="list-style-type: none"> • The plan states that the "School will follow all the state's goals objectives related to curriculum." This section lacks significant detail and important additional information that specifies what these "goals objectives" are. Also missing from the curriculum development and implementation plans are specific timelines. • Significant detail and additional important information that specifically provides relevant research-based data to support the applicant’s claim that work experience positively influences academic performance are missing. • Significant detail and additional important information that specifically provides relevant research-based data to support the applicant’s claims are missing relative to “when a student has a clear understanding of the underpinnings of moral choices and one’s personal responsibility, then that student is more likely, with that knowledge, to make prudent choices . . . “ The application also purports, "This self-awareness and personal responsibility for moral choices in everyday life will result in better classroom discipline, a great decline in bullying, allow teachers to deliver the curriculum without the incessant interruptions that always plague classrooms these days, and students will therefore learn more than in other classroom settings.” Relevant, research-based data to support these claims is also missing. • “The curriculum and undisturbed classroom learning environment will greatly facilitate the School’s mission and students’ needs.” This is cited to help prepare students for college along with the School instilling “within its students the classic understanding of morals and ethics so that our graduates will be able to make wise and informed choices . . . We believe the curriculum can accomplish this goal.” Significant detail and additional important information that specifically provide relevant research-based data to support these claims are missing. • Significant detail and important additional information are missing about the School's expectations for its core curriculum "mastery and skill development" levels, measures, and the grade levels involved. • The plan cites that ". . .the School will incorporate an 	<p>Page 10</p> <p>Page 10</p> <p>Page 13</p> <p>Page 15</p> <p>Page 15</p> <p>Page 10</p>
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<p>enrichment curriculum, which will include a secondary language, philosophy and leadership training." Significant detail and important additional information to make this section reasonably comprehensive and complete are missing. Also missing are significant detail and important additional information regarding the curricular development for PE, leadership, character and citizenship, career exploration/goals, philosophy, and the cited course electives presented on pages 22-23 and 26-27. Also missing is a Financial Literacy course as required.</p>	<p>Pages 10 and 13</p>
<ul style="list-style-type: none"> • Significant detail and important additional information are missing regarding the curriculum and staff oversight/supervision for the required off-site work program to be completed by students starting in grade 10. The application fails to indicate if work program participation is required for grades 10-12 or just some of those years. The applicant does not provide the exact delivery model and schedule to implement the work experience component. Page 2 cites, “. . .we will build into our program the model of working one day a week in a professional environment.” Page 13 indicates that "Each student will average working <u>four full days per month</u>." Complete, comprehensive information to indicate where grades 10-12 students would be during the remaining school days and instructional time during all other Fridays is missing. Further, information to indicate whether or not the work program will provide graduation course credit(s) is missing. Page 14 states, "One way to get the students ready for college and work is to make 'working' <u>part of the curriculum</u>." Page 8 cites, "Through a curriculum enriched by actual <u>weekly work</u> in a professional environment. . ." and Page 51 cites that the educational program will emphasize the "<u>one day a week</u> work component." Curriculum development, strategies/methods, credit-earning opportunities, and implementation plans for the work program are missing. This section creates confusion and demonstrates a major lack of preparation for the work experience program. Substantial concern is raised for the applicant's ability to implement this program in practice. 	<p>Pages 2, 8, 11, 13 14, 29, 51</p>
<ul style="list-style-type: none"> • The plan indicates that the work study/experience program "will follow the School year with specialized academic scheduling which will enable students to work without ever missing a class." Also stated, "The purpose of this program will be to enable students to take college preparatory classes. . ." <p>This plan is incomplete and lacks meaningful detail and requires important additional information to explain how it fits into the proposed grades 10-12 student learning program and a rationale for why a 4-day week is selected for these grades and this model.</p>	<p>Page 13</p>
<ul style="list-style-type: none"> • This section lacks significant detail and important additional information regarding the development and implementation in the classroom of thematic units, team projects, technology 	<p>Pages 15 and 29-30</p>

<p>applications, and online computer classes. Overall, this section is filled with promises and plans to meet the State's curricular requirements but lacks detail and specifics for how and who will be responsible and when such activities will occur. No course electives are cited for computer/technology training.</p> <ul style="list-style-type: none"> • Significant detail and important additional information to make this section reasonably comprehensive and complete are missing regarding the design of the college or university preparatory program/components and implementation activities. Implementation plans for a dual credit program are missing. Additionally, plans/strategies for delivering the philosophy courses that are emphasized in the mission section are missing. • Significant detail and important additional information are missing regarding curriculum and implementation for Project Lead the Way (PLTW) mentioned on page 46. Meaningful detail and important information to explain why this program was selected and how it supports the school's mission, goals, and educational plan are also missing. • The plan states that it is using the Cristo Rey model; and further research on the website provided about the Cristo Rey educational program model indicates it to be “a quality, Catholic, college-preparatory education to students from families of limited financial means.” “A Cristo Rey Network school shall meet the following standards. The school: <i>Standard one: Is explicitly Catholic in mission and enjoys Church approval.</i>” Based on this model, substantial concern is raised that Trinity’s educational program and curricular content will not be compliant with the required separation of church and state per the following: NMAC 22-13-15. Public school instruction; prohibition; 	<p>Page 31</p> <p>Pages 28 and 46</p> <p>Page 2</p>
<p><u>Alignment with NM Standards</u></p> <p>Significant, meaningful detail and important additional information to address the school's plans, a description of the process, and a specific timeline to be used for the alignment of all of its course curricula, the work study program, and online/computer-based instruction components are missing. Plans for a systematic comparison of the school's curricula with the NM standards, identification of gaps between the NM standards and the school's curricula and plans for writing additional curricula to address any identified gaps are missing. The plan states, ". . .our academic programs will favorably impact the Statewide Adequacy Standards requirements. . ." -- clear definition for what these refer to is missing.</p>	<p>Pages 27-28</p>
<p><u>Strategies and Methods</u></p> <ul style="list-style-type: none"> • Significant detail and important additional information are missing regarding the specifics about "Dr. Marzano's Professional Learning Communities school model" and what 	<p>Page 11</p>

<p>outcomes will be achieved for student learning by implementing this model.</p> <ul style="list-style-type: none"> • A descriptive example of the curricular strategies and methods in action in the classroom is missing. • Significant, comprehensive detail is missing regarding the timeline, resources, and funding for teacher/staff professional development (PD) for the numerous instructional strategies and methods described. Expectations are cited that teachers will attend in-service on Friday's, after school, staff meetings, collaborations, at conferences, online, during orientation, as well as initiate research and continue PD on their own time. Page 3 cites, "While students are working on this fifth day, teachers and Principals will use this time for training, collaboration, curriculum planning, and contacts with parents and community members." The plan cites several strategies and methodologies to be implemented but lacks specific professional development and funding to train teachers. (PD is cited for the following: Content Standards, Solution Tree, Baldrige, computer-based instruction, Writing for Success, character education, and STAR, MAPS assessments and data-driven instruction.) • Significant detail and important additional information are missing to explain how the after-school program, home visits, and <i>Seminar for Parents</i> support and/or will be integral components in the School's proposed program. 	<p>Pages 3, 10-11, 13, 29-30, 32-34 and Apdx C</p> <p>Pages 10, 32, 34</p> <p>Page 28</p>
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B. EDUCATIONAL PROGRAM

The educational program should support the school's educational plan. A description of the educational program will be complete if it has addressed the following components:

1. Length of School Day and School Year:

- The proposed length of the school day, including the number of instructional hours;
- The proposed length of the school year, including number of days and total number of instructional hours;
- A description of how the proposed length of the school day and school year support the Educational Plan.

2. Grade Levels, Class Size and Projected Enrollment:

- The grade levels the charter school proposes to serve;
- If a phase-in of grade levels is proposed, a plan for the phase-in by year and grade levels and a rationale for the phase-in plan;
- The total projected student enrollment (at full enrollment for the school).
- Projected class size.

3. Graduation Requirements (if applicable):

- The school's proposed credits and requirements for graduation.

- A description of how any proposed requirements that differ from the New Mexico Graduation Requirements [22-13-1.1.] support the school’s educational plan.

ANALYSIS: EDUCATIONAL PROGRAM

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Length of School Day and School Year</u></p> <ul style="list-style-type: none"> • The number of instructional hours <u>and</u> a description of how the proposed length of the school day and school year support the Education Plan are missing from this section. • Significant, meaningful detail and important additional information providing the reason(s) for the differences in the school week and days and hours for attendance between the 9th graders and the 10-12th graders is missing. Information indicating how/why this model best supports and aligns with the school's mission, goals, and educational plan is missing. The instructional structure/scheduling for this design are missing. • The fact that significant, meaningful detail and important additional information is missing as well as the presentation of confusing and conflicting information make this section difficult to understand. Specifically, the application states, "In the first year. . .our School will serve only the ninth grade; we will have a 5-day class week, with classes conforming to the State-mandated prescribed hours of educational instruction, which <u>generally</u> (emphasized) means 6 hours per day." Substantial concern is raised about the applicant's lack of understanding of statutory instructional hour requirements. The applicant goes on to state that the hours of operation for the 9th grade will be 8:15 a.m. - 3:30 p.m. (7 hours 15 minutes total) with no designated lunch break identified. • Significant, meaningful detail and important additional information is missing to make this section reasonably comprehensive because conflicting information is also presented for the school day hours of operation for the 5-day week for grades 10-12. Paragraph 2 on page 30 states that the length of the school day "will be from 8:00 a.m. until 4:40 p.m., four days a week." This would make the length of the grades 10-12 school day to be 8 hours 40 minutes with no designated lunch break. • Significant, meaningful detail and important additional information is missing to make this section reasonably comprehensive regarding the need or justification for grades 10-12 students attending an <u>additional</u> 35 workdays. Inconsistent information is presented throughout the application for how many hours and days the 10-12th grade students will be participating in the Friday workdays - page 13 indicates "Each student will average working four full days per month." Page 30 simply states "On Fridays, the student will work. . ." Page 8 cites, "Through a curriculum enriched by actual weekly work in 	<p>Page 30</p> <p>Page 30</p> <p>Page 30</p> <p>Pages 2, 3, 8, 13, 30</p>

<p>a professional environment. . ." Page 3 states, "On Fridays, the students will work at a meaningful and professional job setting." Also stated on page 3, "While students are working on this fifth day, teachers and Principals will use this time for training, collaboration, curriculum planning, and contacts with parents and community members." Finally, back to the beginning of the application, page 2 cites, ". . .the innovation of allowing the students to work in a professional environment one day per week." Page 2 goes on to state, ". . .we will build into our program the model of working one day a week in a professional environment." The lack of an exact plan and schedule to be used to implement the work experience component renders this significant part of the educational plan not understandable.</p> <ul style="list-style-type: none"> • Substantial concern is raised for the applicant's lack of understanding of length of school day and planning school year requirements regarding the statement, "In order to fulfill requirements of yearly teaching hours, days will be added at the end of the year <u>if needed</u>." The school calendar must be declared and submitted during the development of a school's budget annually, and there is no statutory requirement for "yearly teaching hours." • Significant detail and important additional information is needed to define the specifics regarding "The extended School day and year . ." that is presented on page 31. The reason/purpose, staffing, and funding plans for this component are missing. • Significant, meaningful detail and important additional information are missing to make this section reasonably comprehensive about the School's plan to require students to participate in the Friday work experience at an off-site work location within the community, and no credit or salary is being granted for this component. 	<p>Page 3</p> <p>Page 31</p> <p>Pages 16 and 31</p> <p>Pages 16 and 30-31</p>
<p><u>Grade Levels, Class Size and Projected Enrollment</u></p> <ul style="list-style-type: none"> • A rationale for the grades phase-in plan is missing from this section. • "If all students do not return each year, we will consider accepting other students to take their place, up to 40 students per grade." A lack of understanding is raised about the applicant's knowledge of meeting student membership terms for public school enrollment policies. 	<p>Page 31</p> <p>Page 31</p>
<p><u>Graduation Requirements</u></p> <ul style="list-style-type: none"> • A description of how the proposed requirements that differ from the NM graduation requirements, 22-13-1.1 support the school's educational plan is missing. • This section lacks significant detail to be reasonably comprehensive and complete and raises substantial concerns about the applicant's understanding of graduation requirements 	<p>Page 16</p> <p>Pages 16 and 31</p>

<p>and their ability to meet the requirements in practice. Further, inconsistent, confusing, and contrary information is presented when comparing the "curriculum requirements" on page 16 with the "Graduation Requirements" noted on page 31. Finally, Trinity HS curriculum requirements are stated in "years" rather than units/course credits as required per statute. Specific issues noted in this section and missing graduation course requirements are cited below:</p> <ul style="list-style-type: none"> ➤ 4 units of mathematics that must include Algebra 2 are required; Trinity requires "3-4 years Mathematics" ➤ 3.5 units in Social Science are required, to include Economics; Trinity is <u>missing</u> the Economics requirement ➤ 1 unit in PE plus a .5 unit in Health is required; Trinity only requires 1 "year of PE/Health Education;" the other half PE credit is <u>missing</u>. ➤ Other <u>missing</u> graduation requirements that are not specified in this plan: Students must take either an AP/Honors or dual or distance education credit. Students must complete a unit in one of the following - a career cluster course, workplace readiness, or a language other than English. Students must take and pass the NM state 11th grade standards based graduation assessment, and the school must offer a Financial Literacy course per statute. ➤ Page 16 reflects a range of 20-25 required credits, while page 30 states that the graduation requirements are 17.5 requirements and 7.5 electives. Additionally, conflicting course requirements are noted on page 16 = required 3-4 years of Philosophy; 2-3 years of foreign language; and 1-2 years of Business. The Work Study/Experience requirement is missing from these requirements listings. Based upon these additional curriculum requirements, the actual graduation requirements for Trinity HS would be 25 credits with 21 of 25 credits being required and only allowing 4 electives to be selected by the students. ➤ Explicit grade level course expectations/requirements are not specified in this section. 	
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C. STUDENT PERFORMANCE EXPECTATIONS

Student academic performance is central to a school's existence. Student performance expectations must be aligned with the mission and the educational plan.

The Student Performance Expectations subsection will be complete if it has provided the following:

- Student-centered goals that are SMART:
 - Specific;
 - Measurable;
 - Ambitious and Attainable
 - Reflective of the school's mission;
 - Time-Specific with Target Dates

- Student-centered goals that are aligned with the school’s mission and the educational plan

ANALYSIS: STUDENT PERFORMANCE EXPECTATIONS

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Student-centered SMART Goals</u></p> <ul style="list-style-type: none"> • Significant detail and information are missing to be reasonably comprehensive for what SBA data will be used for 9th grade in year 1 since HS students are given the NMSBA in grade 11. The data to be used to drive instruction is missing. • The newly identified performance indicator for 80% of the required 100% expected participation of THS students to "complete the work program" lacks specific definition of what the work program components are and also lacks specific metrics to measure those items in terms of progress and successful completion. The specific data to be collected to indicate progress and/or increased/improved performance at specific grade levels and within a specified timeline with target dates is missing. This is not written as a SMART goal as required. • Also described in this section are "performance indicators" for home visits, teacher in-service and training, and expectations that 70% of students in each subgroup will pass the NMSBA. Significant detail and additional important information detailing the specific components to be measured for home visits, teacher training, and clear identification of the student subgroups are missing. Additionally, the specific metric to be used to measure successful progress, improvement, completion for each component are also missing. Specific timelines/target dates for checking achievement and/or success are missing. Overall, the specific data to be collected and reviewed to drive change and/or recognize success is missing. It is difficult to determine how the school will know it has met its expectations relative to home visits, teacher training and NMSBA test scores based on the general information presented. The specific grade levels to be included are not specified. • The goals for Reading, Writing, Mathematics, and Leadership are also not written in SMART goal format as required. All of these goals lack significant detail and raise substantial concerns regarding the applicant's understanding of developing, implementing, and measuring these student learning goals and then using the data to drive instruction and needed change as is indicated they will do. Clear measures to indicate progress, improvement/increase, and completion are missing. These goals are not time specific with target dates. It is unclear what 	<p>Page 31</p> <p>Page 31</p> <p>Page 31</p> <p>Pages 32-35</p>

<p>specific items will be analyzed in the NMSBA results, at what grade levels, and when this will occur to help the staff/school/parent identify and specifically measure any form of change in student achievement.</p> <ul style="list-style-type: none"> • Significant detail is missing to adequately explain the goal and expected outcomes when administering the NMELPA to Spanish-speaking students. Substantial concern is raised that only Spanish speakers are identified in this section. The specific Spanish reading test components to be analyzed and measured along with the specific metrics to be used to determine growth, improvement, increase, and completion within a specified timeline are missing. 	<p>Page 33</p>
<ul style="list-style-type: none"> • Significant detail is missing that adequately explains what the specific metric/measure is that will be used to determine "student proficiency and achievement" in reading to demonstrate at least one month's growth. It is unclear what MAPS and STAR reading test data will be collected and analyzed to demonstrate progress, improvement, increase, and/or completion and for what grade levels, courses, programs. Time specific points to assess reading with target dates are also missing. The same concerns and measures/metrics and the specific data to be collected are also missing for developing individual instructional plans for students who need remediation or enrichment and for determining English Language Acquisition results. 	<p>Page 32</p>
<ul style="list-style-type: none"> • Significant detail and specific proficiency levels for determining improvement in writing are missing. Inadequate information is provided relative to what the expectations and content requirements for the writing portfolios will be. The specific grade levels and courses/programs to be analyzed are missing. The specific data to be collected and reviewed to help determine growth, improvement/increase, and completion is missing. How writing will be integrated into other curricular areas within a specified timeline with target dates and what specifically will be measured and with what metric to again determine growth, improvement, increase, completion is missing in this section. The purpose for using PDSA and ACE and identification of what measures will demonstrate successful writing achievement is missing. Significant detail is missing that adequately identifies what data will be collected and analyzed to determine success. 	<p>Page 33</p>
<ul style="list-style-type: none"> • Significant detail and information are missing to adequately identify what measure will be used to determine one month's growth in STAR Math to determine how students have grown "academically." The metric to be used that will clearly demonstrate growth, increase, improvement, completion in achieving math skills is missing. The specific math skills to be measured and the grade levels, courses to be measured are not identified. Again, the application fails to identify what specific data will be collected and analyzed to determine and share 	<p>Page 34</p>

<p>results.</p> <ul style="list-style-type: none"> • As part of the Math assessments, "At risk students will be easily detected and provided help . . ." Significant detail and important additional information identifying specifically what test/assessments will be used, what will be measured, when, by whom, and how are missing. The students and grade levels to be tested are not clearly identified. The NMSBA item analysis components to be reviewed and for what grade levels and within what timeline are not adequately identified. How and by whom after school tutoring needs will be determined from the data is not adequately addressed. • Significant detail and important additional information identifying who will be responsible for and the timeline for when the site-based pre- and post-tests for math skills at each grade level will be developed are missing. The specific math courses to be included are not adequately identified. • Significant detail and important additional information is missing to adequately identify the problem solving activities and skills that will be assessed and at what grades levels, content areas, and within what specified timeline and target date. • Significant detail and important additional information is missing regarding the specific items to be assessed in the work experience program to determine student success and also missing are those specific indicators that will be assessed to demonstrate strong character and leadership skills/traits. The specific components to be measured and the specific metrics to be used to indicate progress, improvement, increase, completion within this program are missing. Additionally, specific timelines and target dates are not identified. The specific data to be collected and analyzed is missing, and what measure of success and/or skill is demonstrated by evaluating the hours spent in the program is not adequately explained. The specific surveys to be developed and evaluated are not adequately addressed relative to the specific content, measures, timeline and target date; and the grades, courses, programs to be assessed are missing. Clear measures and the data to be collected to measure successful school relationships are missing. • Substantial concern is raised regarding the ". . .level of proficiency established by the content standards and the curricular expectations . . ." A lack of understanding by the applicant regarding NMPED content standards is evident and the ability of the applicant to meet these requirements in practice also raises substantial concern. Significant detail and needed important additional information are missing regarding how "remediation and academic improvement programs" will be developed and implemented, who will do this, for which content standards and grade levels and subject areas to address content standard deficiencies within the school's plan. 	<p>Page 34</p> <p>Page 34</p> <p>Page 34</p> <p>Page 34</p> <p>Page 34</p>
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<ul style="list-style-type: none"> Assessments for PE, business, and the elective courses listed (philosophy, foreign languages, and ethics) are missing. <p><u>Alignment</u></p>	
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D. PLAN FOR EVALUATING STUDENT PERFORMANCE

A Plan for Evaluating Student Performance will be complete if it addresses the following components:

- the types of assessments that will be used to measure student progress toward achievement of the NM Standards and the school’s student performance expectations;
- the timeline for achievement of the NM Standards and/or the school’s student performance expectations;
- the procedures for taking corrective action in the event that student performance falls below the NM Standards and/or the school’s student performance expectations;
- remediation for students not achieving standards, including a timeline for implementation of the remediation plan;
- assessments that might be considered in addition to the statewide-mandated testing;
- documentation and reporting of student data to students and parents.

ANALYSIS: PLAN FOR EVALUATING STUDENT PERFORMANCE

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Types of Assessments</u></p> <ul style="list-style-type: none"> Substantial concern is raised about the applicant’s understanding of required NM assessments -- both formative and summative – content areas and grade levels to be tested, state outcomes (AYP) expectations, and the School’s ability to meet assessment requirements in practice. Significant detail is missing about the short-cycle assessments the school plans to use. Meaningful detail about the school’s implementation and use of the NMSBA data (identified to be a test from the NM School Board Association on page 12) and students achieving AYP is missing. Substantial concern is raised that the applicant references content standards proficiency as part of required NM assessments; a lack of preparation is demonstrated relative to the required grades 9-12 assessments and the overall value and use of the data to be gleaned from these systems to drive instruction. Significant detail and important additional information is missing about the school’s student performance expectations. Throughout this section, the application cites that the School will “encourage all students to reach their highest potential and academic achievement,” which is reflective of the applicant’s lack of understanding about setting clear goals with measures to 	<p>Pages 32-35</p> <p>Page 34</p> <p>Pages 32-35</p>

<p>help quantify success. Clearly defined, specific, measurable, and time bound student performance outcomes to be demonstrated via the proposed school tests/assessments are missing. This section is incompletely addressed. The applicant presents information in this section in general, broad terms relative to students taking tests, teachers studying and reporting results, and changes being made. Specificity is missing for what content will be measured and at what grade levels; what metrics will be used to measure; what the anticipated levels of growth, improvement, increase will be; and what the specific timeframes and target dates for achievement are expected to be. Meaningful detail and important additional information that specifically identify what data will be gathered and when, how, and who will be responsible for evaluating and reporting the results are missing.</p> <ul style="list-style-type: none"> • A specified timeline for achievement of the NM Standards and the school’s student performance expectations is missing. The applicant references students taking the annual NMSBA [specific content areas and grade level(s) not identified] and the development of 3-year individual student plans for those who fail to achieve proficiency; however, specific proficiency levels by grade and content area/course are missing. A rationale explaining why a 3-year plan was selected and how monitoring and adaptations will be made is missing. • Significant detail and additional important information to address the required 11th grade Standards Based graduation assessment are missing. 	<p>Pages 32-33</p> <p>Pages 32-33</p>
<p><u>Timeline for Achievement</u></p> <p>The timelines for achievement lack significant detail and fail to clearly specify what the definitive timeframes and target dates for achievement are expected to be for all grades and for the varied tests/assessments cited above. There are no specific time parameters for reviewing assessment data.</p>	<p>Pages 32-35</p>
<p><u>Corrective Action</u></p> <p>The procedures for taking corrective action, which refers to the specific adjustments/action the school plans to make as a result of periodic grade-level or school-wide data analysis to ensure that the school is meeting the NM Standards or other student performance expectations, lack significant meaningful detail in order to be reasonably comprehensive. The applicant presents information in this section in general, broad terms by stating that “necessary interventions will be implemented to meet the needs of students who demonstrated deficiency on either a curriculum-based assessment or a NMSBA exam.” And, the teachers and Principal will “arrange appropriate supportive strategies for students at risk.” “At risk students will be easily detected and provided extra help . . . to catch up with their peers.” The application further states that it will “arrange for appropriate supportive programs for students at risk.” Significant, meaningful, definitive detail that specifies what these strategies will be and what</p>	<p>Pages 31-35</p>

<p>methods/tools will be used to detect those at-risk students who need support are missing from this section. Specific procedures that will be implemented for taking corrective action are also missing.</p>	
<p><u>Remediation</u> Specified timelines for implementation and monitoring of those activities/actions put in place to help students not achieving standards are missing.</p>	<p>Pages 31-35</p>
<p><u>Additional Assessments</u></p> <ul style="list-style-type: none"> • These cited school/additional assessments (though not identified as such by the applicant) -- STAR Reading test, ELA teacher observations, student writing assignments and portfolios, exhibition, STAR Math test, teacher tests, pre- and post math tests developed by the school for each grade level, work program assessments, tutoring hours, teacher in-service, and home visit surveys fail to specifically identify and define the content, activities, items that will be measured and also do not clearly identify specific timelines for achievement, particularly beyond one month or one year. There are also no definitive target dates for achievement identified. This section is found to be incomplete and missing significant detail and important additional information to make it reasonably comprehensible. • The application cites that “other comparable assessments” will be used but fails to specify and identify what these assessments will be, what they will measure, how they will measure, who will use the data, and how it will be monitored and reported. 	<p>Pages 32-35</p> <p>Page 32</p>
<p><u>Documentation and Reporting</u></p> <ul style="list-style-type: none"> • Documentation and reporting of student data is limited to special education students. 	<p>Page 36</p>

E. SPECIAL POPULATIONS

A Special Populations subsection will be complete if it has addressed the following components:

- Suggested modifications to the proposed educational program to meet individual student needs, such as bilingual, limited English proficient, and special education;
- An outline of a special education plan (*the final plan of which must be completed and submitted to the charter authorizer by the end of the planning year*) that demonstrates understanding of state and federal special education requirements including the fundamental obligation to provide a free, appropriate education to students identified with disabilities;
- How the charter school will provide access to ancillary services for these special populations, when necessary.

ANALYSIS: SPECIAL POPULATIONS

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Modifications to meet Individual Student Needs</u> This section lacks significant, meaningful detail and important additional information to be reasonably comprehensive in providing specific suggested modifications that would be implemented to the School's proposed educational program to meet individual student needs. This section is written primarily in the form of assurances and includes insufficient detail to provide a clear picture of how special education will be managed in the proposed school. For example, the plan does not address specifics or examples of the continuum of services to be offered, examples of modifications and accommodations, assessments, documentation, professional development for staff, etc.</p> <p><u>Special Education Plan</u> Only general statements assuring that the School will follow required special education law are provided; meaningful detail and important additional information to make this section reasonably comprehensive are missing. Substantial concern is raised about the applicant's understanding of special education and the School's ability to meet special education requirements. SAT is mentioned as a strategy but detail regarding identification and implementation using SAT are missing. Likewise, the three tiers of intervention to be implemented via RTI strategies are also provided and state that these strategies will be used "at the first sign that a student is struggling." Clear definition for "struggling" students and the intervention methodologies to be implemented in and outside of the classroom at each level are missing. Substantial concern is raised about the applicant's ability to implement appropriate SAT and RTI strategies based on the applicant's statement that, ". . .developing intervention plans for individual students can be time consuming." SAT & RTI are not interchangeable or of similar purpose.</p> <p><u>Access to Ancillary Services</u></p>	<p>Pages 35-36</p> <p>Pages 36-37</p>

EDUCATIONAL PLAN SUMMARY

Please summarize your analysis of the Educational Plan Summary section of the school’s application. Your summary should reflect your overall impression of the section as presented.

Summary Analysis
<ul style="list-style-type: none"> • This section fails to completely explain what the students will achieve; how they will achieve it; and how the school will evaluate their performance. A clear picture of what a student who attends the school will experience in terms of assessment and outcomes is missing, and this educational plan is found to be incomplete and inadequate in its alignment and support of the proposed mission for the school. This section is missing clear metrics that are distinctly stated for measurement of expectations for all goals. There is no measurement stated for the length of time that it will take for a student to achieve success in standardized examinations. There are no

specific time parameters for completion of assessments or for reviewing assessment data.

- While citing varied publications and quotes from public figures, there is no substantial evidence or data that supports the Cristo Rey model as paramount to increasing graduation rates among lower socio-economic communities, such as that of the Española Valley. The curriculum framework lacks complete development information and anticipated timeline expectations for core academic, elective courses, dual credit, and the work experience program. Additionally, a clear explanation for how Trinity’s goals will prepare students for college is missing.
- Because numerous sections are missing required information and/or criteria is not sufficiently addressed, there are substantial concerns about the applicant’s overall understanding of concepts related directly to education, academics, graduation expectations of students, and the ability of this school to meet the requirements for operating a public school in practice. Further, a clear focus on student academic achievement is clearly missing in this application; instead, this school has designated its primary focus to be work experience, philosophy, ethics, and morals. The work experience requirement is not correlated to academic skills or performance expectations or an opportunity for students to earn HS credits or a salary, and significant detail and important additional information focused on and supporting the School’s claim of meeting the goal of students becoming “college ready” (page 8) are missing.
- Contradictory information is presented throughout the educational plan. The applicant’s demonstrated lack of preparation and understanding about: curriculum development and implementation, assessments and data-driven systems, student performance and achievement, alignment of course content with NM content standards, instructional strategies and methods, structuring/scheduling and planning for the school day and year, graduation requirements, SMART goals, procedures for corrective action and remediation, and serving special populations have resulted in an incomplete plan that reflects an inadequately substantiated conceptual approach to instruction through practices that fail to establish a climate of high academic expectations and rigor and instead choose to apply an ambiguous and often inconsistent focus on work experience that assigns importance to the level of student on-the-job time away from the school elicited than to the level of student achievement attained.

VI. FINANCIAL PLAN

The Financial Plan should provide a description of how the school leadership intends to manage the school’s finances, including assurances that public funds will be used appropriately and in compliance with all applicable federal and state requirements and laws. It should present a clear picture of the school’s financial viability including the soundness of revenue projections; expenditure requirements; and how well the school’s budget aligns with and supports implementation of the mission and educational plan.

A. BUDGET

A Budget subsection will be complete if it has addressed the following components:

- A completed revenue projection form 910B5 (included in the application appendices).
- A balanced proposed operating budget covering each year of the charter term based on current unit value using the **5-Year Budget Plan** (included in the application appendices).

- A detailed narrative description of the revenue and expenditure assumptions on which the operating budget is based. The budget narrative should provide sufficient information to fully understand how budgetary figures are determined. The following should be addressed:
 - major start-up expenses, including staffing and benefits; special education services; facility costs; materials and services; and contracted services; and
 - spending priorities that align with the school’s mission, educational program, management structure, professional development needs, and growth plan.
- A detailed narrative description, including the projected amounts, of all revenue sources other than SEG funding, to include any federal, state, or private funds and/or grants.
- A detailed narrative description of the expenditure assumptions for these other revenue sources.

ANALYSIS: BUDGET

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Revenue Projection Form 910B5</u></p> <p><u>Operating Budget</u></p> <ul style="list-style-type: none"> • This section lacks significant detail and important additional information to be reasonably comprehensive and raises substantial concern about the applicant's understanding of developing a realistic operating budget to fund all items planned. Specific explanations detailing the breakdown for all items planned to be funded within the varied contract services - "Related services contracts, Other professional services, Other travel and Other Contract services," cited in the 5-year budget, (Line items #25, #29, #40, and #41 respectively) are missing. • Spending priorities that align with the school's educational program, management and staffing structure, and professional development needs are difficult to discern, and adequate funding to support the myriad of expenses described is missing. Specifically, for the <u>start-up</u> (Year 1) expenses cited on page 46: funding for additional portable classrooms cited in the Facilities narrative (p. 90) for years 4 and 5 but not found in the budget; funding for \$20,000 for cafeteria tables and filing cabinets, etc. is not found in the budget; \$1,000 is budgeted for computers/related equipment and the narrative cites \$45,000 "general and network technology" expenses; \$20,000 is budgeted per the narrative for the SIS and varied software and the budget reflects \$13,000 for software and software licenses; \$45,000 is cited in the narrative to be the principal's salary and the budget reflects \$41,000; \$12,000 is budgeted per the narrative for initial rent for the facility and the budget reflects \$15,000. • The narrative on pages 46-47 cites significant facility expenses for kitchen and other equipment to include refrigerator, warming trays, serving utensils, copy machine, safe, computers, etc. Page 90 states that the school has no intention of providing food services in year 1, thus these projected expenses seem unnecessary. This funding is not found in the budget as written. 	<p>Pages 46 and Appendix D, 5-Year Budget</p> <p>Pages 46-47 and 90</p> <p>Pages 46-47,51, and 90</p> <p>Page 47 and Appendix D</p>

<p>Funding for outside academic counseling services (cited on page 51) is not found in the 5-year budget.</p> <ul style="list-style-type: none"> • Substantial concern is raised about the applicant's understanding and planning for staff budgeting, specifically for the Instructional Assistants (IA). A rationale to explain why the Year 1 salary for a .5 FTE is \$8,000 and year 2 salaries for 2.5 FTE will be \$15,000 each, thus reflecting a decrease in the salary to be earned. Per the actual 5-year budget, the year 3 salaries will be \$44,000 for 3 FTE, which yet again equates to another decrease in IA salaries, now \$14,667 per FTE. In year 4, the per FTE IA salary will be \$15,000 and increases to \$15,333 in year 5. • Substantial concern is raised about the applicant's understanding and planning for staff budgeting and their ability to provide a viable, balanced budget that will adequately serve students per the proposed educational plan and operational needs. Specifically, page 47 makes this statement about the Business Manager, "No salary has been calculated for this position as it will be contracted." All contracted positions must be budgeted for, and this statement contradicts the applicant's earlier statement on page 43 that a Business Manager would be hired and per the Organization Chart before page 61. Line item #28 reflects a \$50,000 budget item for Finance/Bookkeeping/Accounting. The 5-year budget also does not reflect a salary for a Counselor (page 41); for an ELA teacher (page 32); for cleaning services (page 52) or for a Librarian (Attachment A). Additional substantial concern is expressed that the Custodial position fails to meet minimum wage salary requirements. • Substantial concerns are also raised for the lack of significant detail and important additional information per the 5-Year Budget for years 1-5 to specify: <ul style="list-style-type: none"> ➤ Line item 25 cites funding for PD with no clear explanation for the specific PD trainings that will be covered in year 1, etc. Numerous PD plans are cited within the educational plan, to include, Content Standards, Professional Learning Communities, Solution Tree, Baldrige, Writing for Success, curriculum development, and "ongoing professional development." • Significant detail and rationale are missing to explain why the School would be paying "to develop the staff as well as assist in providing other charter Schools with training that has been successful to Trinity." • Significant detail and explanation are missing for what "additional ancillary needs" justify the substantial increase in "Related Services Contracts" amounts from Year 1 to Year 2. • Substantial concern is raised that the 5-year budget fails to identify funding for the NMSBA and MAPS assessments to be purchased. Additionally, equipment and vehicles are budgeted for in the 5-year budget; however, the narrative failed to 	<p>Pages 32, 41, 43, 47 and Appendix C</p> <p>Pages 10, 11, 29, 30, 33, 34</p> <p>Page 48</p> <p>Pages 39 and 48</p> <p>Pages 32 and 49</p>
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<p>provide detail describing what the actual purchases would be for these items.</p> <p><u>Revenue and Expenditure Assumptions</u></p> <ul style="list-style-type: none"> The applicant indicated that the school will "contract" with an independent, outside auditor; it is difficult to determine whether the applicant plans to directly contract with the auditor or as part of the PED's contract with an outside auditor. Clarification is needed. <p><u>Revenue Sources Other Than SEG Funds</u></p> <p>Significant detail is missing that explains what "Lethe School Assistance Funds" are and how they would be expended.</p> <p><u>Expenditure Assumptions for Other Than SEG Funds</u></p> <ul style="list-style-type: none"> Significant detail is missing and inadequate funding is budgeted in the 5-year plan for the 40 laptops the school plans to purchase and also use for implementation in "the delivery of online services." Significant detail is also missing about the school contracting with EPS or through NMCC to provide the online computer services. The details for such contract plans are missing in the education plan, and no formal agreement with either entity is included with the application. Significant detail and additional important information are missing that specifically identify spending plans for all of the other-than-SEG funding sources. This demonstrates a lack of preparation and raises substantial concern for the applicant's ability to adhere to meeting funding requirements in practice. 	<p>Page 43</p> <p>Pages 51 and 90</p> <p>Page 51</p> <p>Page 51</p> <p>Page 51</p>
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B. FISCAL MANAGEMENT

A plan for fiscal management subsection will be complete if it has addressed the following components:

- A detailed plan indicating how the charter school will manage its fiscal responsibilities.
- A description of the school's internal control procedures that it will utilize to safeguard assets, segregate its payroll and other check disbursement duties, provide reliable financial information, promote operational efficiency, and ensure compliance with all applicable federal statutes and regulations and state statutes and rules relative to fiscal procedures.
- A description of the manner in which the annual audit of the financial operations of the charter school is to be conducted.

ANALYSIS: FISCAL MANAGEMENT

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<u>Fiscal Management Plan</u>	

<p><u>Internal Control Procedures</u></p> <ul style="list-style-type: none"> • Significant detail and specificity explaining who/job position that will be responsible and involved in the segregation of duties are missing for who will receive purchases. • Significant detail and important additional information is missing about Purchasing protocols; specifically, expected protocols for the use of a debit card are missing. <p><u>Annual Audit of Financial Operations</u></p>	<p>Pages 55-56</p> <p>Pages 55 and 67</p>
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FINANCIAL PLAN SUMMARY

Please summarize your analysis of the Financial Plan Summary section of the school’s application. Your summary should reflect your overall impression of the section as presented.

<p><u>Summary Analysis</u></p> <p>A clear picture of the school’s financial viability including the soundness of its 5-year operating budget and other-than SEG revenue and expenditures is incompletely presented. This section lacks significant detail and important additional information to be reasonably comprehensive and raises substantial concern about the applicant's understanding of developing a transparent, realistic operating budget to support implementation of all components proposed in the School's mission and educational plan.</p>
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VII. GOVERNANCE /MANAGEMENT PLAN

The Governance/Management Plan should provide an understanding of how the school will be governed and managed. It should present a clear picture of the school’s governance and management practices, what roles and responsibilities various groups and individuals will have, and how those groups will relate to one another. The Plan should outline how decisions are made at the school site, and provide a convincing picture of the school leadership’s capacity to successfully operate the school. In addition, the governing body of a charter school is, first and foremost, publicly accountable for student academic performance and the expenditure of public funds.

A. GOVERNANCE /MANAGEMENT STRUCTURE

The Governance Structure subsection will be complete if it has addressed the following components:

- A description of the over-all school governance and site-based management structure.
- An organizational chart for the school that:

- o illustrates the proposed school site-based personnel reporting structure to the governing body and the relationship of the governing body to the school’s leader and administration;
- o Includes on the chart all proposed administrative/staff positions, parent councils, advisory committees and community groups (if any).
- A narrative description of the chart.

ANALYSIS: GOVERNANCE /MANAGEMENT STRUCTURE

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Governance and site-based management structure</u></p> <ul style="list-style-type: none"> • Substantial concern is raised about the applicant's understanding of Governing Board (GB) requirements and their ability to be compliant with NM statute in practice. Specifically, NM statute does not allow for an "Interim Board." The governing body members identified within this application who have also signed assurances that they have read and agree to the terms within this application as submitted are recognized to be the one and only governing body for Trinity who accept full board of finance authority and responsibility for this school. The School may not wait to put together their GB "within 45 days of the first day of the approval of the Charter" and be selected by an Interim Board. • Significant detail is missing and clarification is needed to clearly identify the correct title for the Head Administrator of this school. Per the organizational chart, the title is "Principal," however, page 61 refers to an "Interim Director" who will begin hiring. Per NM statute, the GB must hire the Principal and only the Principal may hire staff. (The Interim Director position is not found in the organizational chart.) 	<p>Page 61</p> <p>Page 61 and preceding page</p>
<p><u>Organizational chart and narrative description</u></p> <ul style="list-style-type: none"> • All proposed administrative/staff positions, parent councils, advisory committees, and community groups are not shown in this organizational chart for Trinity. Significant additional important information and detail about these missing positions included within the application -- Instructional Assistants, Nurse, Custodian, Special Education Teacher/Coordinator, Librarian, IT Coordinator/Director -- and committees/councils are omitted from this chart. A demonstrated lack of preparation and understanding is evident regarding the requirement to specifically identify all positions. The organizational chart fails to identify the specific positions included within the "Other Program Providers" and "Other Paid Staff." • As shown, the GB reports directly to the Española Public Schools (EPS) and the Business Manager reports to both the Principal and EPS. Substantial concern is raised for the applicant's lack of understanding about compliant reporting 	<p>Page preceding page 61</p> <p>Page preceding page 61</p>

structures for state-chartered schools. Contract services positions, distinct from employee positions, are not clearly identified and differentiated.	
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B. DESCRIPTION OF THE GOVERNING BODY

The Governing Body subsection will be complete if it has addressed the following components:

- Policies and procedures by which the governing body will operate in compliance with all applicable statutes and regulations, including the Open Meetings Act, and that address:
 - board powers and duties as a whole, individual members, and officers of the governing body;
 - governing body member recruitment and selection, including the orientation process for new members and ongoing professional development;
 - the criteria and the process that will be used to select the school’s head administrator;
 - budgeting and operation of the school; and
 - how decisions will be made.
- A list of each of the members of the school’s governing body;
- A brief description of the qualifications of each governing body member.
- An explanation of the nature and extent of staff, families, and the community involvement in the governance of the school, and how they will be notified of the opportunity to participate in the school governance.

ANALYSIS: DESCRIPTION OF THE GOVERNING BODY

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Governing Body policies and procedures</u></p> <p><u>List of governing body members and qualifications</u> The application cites that the governing body will be selected 45 days AFTER the approval of the application, therefore, a list of the School’s Governing Body members is nonexistent and missing at this time; only the “Interim” GB member names are provided.</p> <p><u>Staff, families, and community involvement in governance</u> Significant detail and important additional information are missing for how staff, families, and community will be notified of the opportunity for their participation in school governance.</p>	<p>Page 62</p> <p>Page 67</p>

C. PARTNERSHIPS: *This section is optional and should be completed if the school has identified a partner organization that is essential to the existence of the charter school, its governance, key instructional, and/or management functions.*

The Partnership subsection will be complete if the following components are included:

- Name of the partner organization.
- Name of the contact person at the partner organization and that person’s full contact information.

- A description of the nature and purpose of the school’s partnership with the organization.
- If applicable, an explanation of how the partner organization will be involved in the governance of the school.
- Evidence (in the form of a letter of support or intent to partner) that the school has a formal partnership agreement with the partner organization.

ANALYSIS: PARTNERSHIPS

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Partner organization and contact information</u> The School has provided "pledge letters" from varied organizations and businesses interested in providing job sites for "volunteer interns" from the school's planned work experience program. It is not clear if the persons who signed the bottom of these partnership letters are in positions of authority to sign formal agreement letters/documents that would bind their specified organization/institution to the purported partnerships identified.</p> <p><u>Nature and purpose of partnership</u></p> <p><u>Partner organization involvement with school governance</u></p> <p><u>Evidence of formal partnership agreement</u> See above.</p>	<p>Page 68 and Attachment F</p>

D. SCHOOL ORGANIZATIONAL STRUCTURE

A School Organizational Structure subsection will be complete if the following components are included:

- Based on the organizational chart provided under subsection A. *GOVERNANCE/MANAGEMENT STRUCTURE* above, a description of the site-based management structure at the school and job descriptions that identify key roles, responsibilities and accountability for each staff position listed on the organizational chart will be presented.
- A staffing plan for each year of the first charter term, including the proposed pupil-teacher ratio that supports the educational plan.

ANALYSIS: SCHOOL ORGANIZATIONAL STRUCTURE

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>Description of site-based management structure and job descriptions for all organizational chart positions</u></p> <ul style="list-style-type: none"> • Specifically, licensure requirements for professional staff are missing for the Principal, teachers, IAs, SPED position, and Nurse. • Staffing positions that have been presented and described throughout the application and in the <i>Personnel Policies</i> are 	<p>Pages 69-80 & Attachment A</p> <p>Attachment A</p>

<p>missing from this section. Specific positions with their identification of key roles that are missing are the following: Advisory and Parent Council groups, Librarian, Information Technology position, Director of Special Programs, and ELA teacher.</p> <p><u>Years 1-5 staffing plan with pupil-teacher ratio supporting educational plan</u></p> <ul style="list-style-type: none"> • Significant detail and important additional information is needed to clarify how 2 teachers will adequately staff the proposed educational plan that includes the 4 academic areas, PE, Health, work experience, and the required electives that all students must take in philosophy, foreign language and business to achieve the required 25 graduation credits. It is unclear if the projected staffing of 8 teachers for these four HS grades will be adequate to meet the proposed graduation requirements in this plan. • The narrative in this section contradicts the planned teacher FTE per the 5-year operating budget and fiscal section narrative (p. 47) that indicate yr 2 staffing to be 5; yr 3 staffing to be 6, and yrs 4-5 staffing to be 8. 	<p>Page 80</p> <p>Pages 47 and Attachment D</p>
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E. EMPLOYEE RELATIONS

An Employee Relations subsection will be complete if the following components are addressed:

- A description of the school’s personnel policies and procedures that comply with all applicable federal statutes and regulations, including the School Personnel Act.
- The proposed salary schedules for all employees that comply with the minimum salary requirements as identified in the School Personnel Act.
- A description of the evaluation process for staff that will include evaluation of teachers by a licensed school administrator.
- A description of the school’s staff discipline process that provides for due process.

ANALYSIS: EMPLOYEE RELATIONS

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>School’s personnel policies and procedures</u></p> <p><u>Proposed salary schedules for all employees</u></p> <p><u>Evaluation process for staff</u></p> <ul style="list-style-type: none"> • Substantial concern is raised about the applicant's understanding of the required PED evaluation procedures and forms as part of the 3-tier licensure system. The sample forms provided in Attachment E are inadequate. • The required Teacher Mentor program is not addressed in this application. 	<p>Page 82 and Attachment E</p>

<p><u>Staff discipline process</u> It is unclear what process will be used to address personnel who display a "chronic lack of cooperation and poor attitude."</p>	Page 85
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F. STUDENT ENROLLMENT PROCEDURES AND DISCIPLINE POLICY

A student enrollment procedures and discipline policy section will be complete if the following components are addressed:

- A description of the school’s enrollment policies and procedures, including an explanation of the enrollment timeline.
- A lottery process that is in accordance with applicable law.
- A brief description of the proposed student discipline policy that complies with the Student Rights and Responsibilities set forth in the Public Education Department rules and regulations [6.11.2 NMAC] (Note: proposed student discipline procedures are to be included in the Appendices.)

ANALYSIS: STUDENT ENROLLMENT PROCEDURES AND DISCIPLINE POLICY

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>School enrollment policies and procedures</u></p> <ul style="list-style-type: none"> • The applicant states, ". . .any resident of the Española School District can apply." Limiting the geographic location from which students may enroll is noncompliant with NM charter school law. • The applicant stated that, ". . .our policy to make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in lack of appropriate facilities or services or an undue hardship that state and federal laws recognize as just." This practice would be noncompliant with law that requires schools to modify facilities and services to accommodate such individuals. <p><u>Lottery process</u></p> <ul style="list-style-type: none"> • This section addresses some of the criteria but lacks additional important information to be reasonably comprehensive; the lottery process fails to cite specific lottery dates to be held and also fails to state that the school will publish the number of open seats available for each lottery. • The application states, "All age-appropriate students who are eligible to enroll in a New Mexico public school will be eligible to be enrolled in the School." Placing a maximum age requirement/limitation for student enrollment in a charter school would be noncompliant with NM law. 	<p>Page 87</p> <p>Page 87</p> <p>Page 88</p> <p>Page 88</p>

<u>Description of proposed student discipline policy</u>	
<u>Proposed student discipline procedures (appendix)</u>	

G. FACILITIES:

The facilities plan should demonstrate that the applicant group has carefully considered the school’s facilities needs and understands its options for meeting those needs.

Has the applicant group selected or secured a facility? **Yes** **No**

NOTE: Based upon “YES” or “NO”, complete the appropriate analysis below.

If “YES” a Facilities section will be complete if the following components are addressed:

- A description of the proposed facility, including location, size, and layout of space. An explanation of how the facility will support the implementation of the school’s educational plan.
- An explanation of the proposed capital outlay needs for the facility, including projected requests for capital outlay assistance for the school.

ANALYSIS: FACILITIES – IF “YES”

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<u>Description of proposed facility and how facility will support school’s educational plan</u> <ul style="list-style-type: none"> • Significant detail and additional important information is missing about the layout of space and how this facility will support the implementation of the school's educational plan. • The budget fails to include projected revenue and expenditure amounts/plans for the purchase of additional portables in years 4 and 5. 	Page 90 Page 90
<u>Proposed capital outlay needs</u>	

If “NO” a Facilities section will be complete if the following components are addressed:

- An explanation of the school’s needs for a facility that will support the implementation of the school’s educational plan, including desired location, size, and layout of space.
- A reasonable plan for identifying and securing an adequate facility.
- An explanation of the proposed capital outlay needs for the facility, including projected requests for capital outlay assistance for the school.

ANALYSIS: FACILITIES – IF “NO” --

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<u>Explanation of school’s facility needs to support educational plan</u> Not applicable.	
<u>Reasonable plan for identifying and securing adequate facility</u> N/A	
<u>Proposed capital outlay needs</u> N/A	

H. OTHER STUDENT SERVICES

This section will be complete if the following components are addressed:

- A description of the school’s plans for meeting the transportation needs of its students and plans for contracting services for transportation, if applicable.
- A description of the school’s plans for meeting the food services needs of its students and plans for contracting services for food services.
- A description of the school’s plans for providing student access to other services, including but not limited to counseling and health services and plans for contracting services, if applicable.

ANALYSIS: Other Student Services

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<u>Transportation</u> <u>Food Service</u> <u>Student access to other services</u> This information is contradictory to prior sections indicating that the school will hire a Counselor and Nurse.	Page 41

GOVERNANCE / MANAGEMENT PLAN SUMMARY

Please summarize your analysis of the Governance/Management Plan Summary section of the school’s application. Your summary should reflect your overall impression of the section as presented.

Summary Analysis
<ul style="list-style-type: none"> • The Governance/Management Plan should provide an understanding of how the school will be governed and managed. Substantial concern is raised about the applicant's understanding of Governing Board requirements and their ability to be compliant with NM statute in practice. An Interim Board is not allowed per NM statute. • The governance plan should present a clear picture of the school’s governance and management practices, what roles and responsibilities various groups and individuals will have, and how

those groups will relate to one another. All proposed administrative/staff positions, parent councils, advisory committees, and community groups are not shown in the organizational chart for Trinity.

- The Plan should outline how decisions are made at the school site and provide a convincing picture of the school leadership’s capacity to successfully operate the school. Concern is expressed for the tentative structure that is proposed, i.e., in November, an Interim Director will first be contracted to hire the Principal and begin contracting with potential staff members. This demonstrates a lack of understanding of the governance relationship required for charter schools.
- The applicant failed to address the required PED teacher evaluation procedures and forms as required in the 3-tier licensure system.
- Significant detail and additional important information is missing about the layout of space and how this facility will support the implementation of the school's educational plan.
- Significant detail and important additional information is needed to clarify how two teachers will adequately staff the proposed educational plan that includes the four core academic content areas plus PE, Health, work experience, and the required electives that all students must take in philosophy, foreign language and business to achieve the required 25 graduation credits required by Trinity. Substantial concern is raised that the projected staffing to eight teachers for these four HS grades will be adequate to meet the proposed graduation requirements in this plan and still maintain the 20:1 student/teacher ratios in all classes.

VIII. REQUIREMENTS

The Requirements section of the application addresses the necessary arrangements that school leaders must make to define the respective legal liability and responsibility of the governing body and the Public Education Department. These requirements include, but are not limited to, securing appropriate insurance coverage and identifying waivers that will be sought by the school from the Public Education Department.

A. LEGAL LIABILITY AND INSURANCE COVERAGE:

The legal liability and insurance coverage section will be complete if contains:

- A statement that the charter school will participate in the public school insurance authority and will comply with all applicable rules of that authority.

ANALYSIS: LEGAL LIABILITY AND INSURANCE COVERAGE

Criteria Not Sufficiently Addressed Concerns & Additional Questions	Reference
<u>Statement of public school insurance participation</u>	

B. WAIVERS

The waivers section will be complete if the following components are addressed:

- A list of the specific waivers that will be requested from the department’s requirements, rules, and provisions including, but not limited to those found in the Public School Code pertaining to individual class load, teaching load, length of the school day, staffing patterns, subject areas, purchase of instructional material, evaluation standards for school personnel, school principal duties, driver education and graduation requirements.
- If any waivers will be requested that are not pertaining to those listed above, the applicable statute and/or state rule that the school will request to be waived is cited.

ANALYSIS: WAIVERS

Criteria Not Sufficiently Addressed, Concerns & Additional Questions	Reference
<p><u>List of waivers to be requested from PED</u> An overwhelming majority of the waivers listed in the application are not necessary, or related to the requirements for a state-chartered school. For example, the application requests a waiver from reporting to the local superintendent. The only waiver that is appropriate for the educational plan provided is the Instructional Materials</p> <p><u>Other waivers not pertaining to PED waivers to be requested from PED; must include applicable statute and/or state rule to be waived</u></p>	<p>Pages 91-93</p>

REQUIREMENTS SUMMARY

Please summarize your analysis of the Requirements Summary section of the school’s application. Your summary should reflect your overall impression of the section as presented.

REQUIREMENTS SUMMARY
<p>The applicant lacks an understanding of waivers pertaining to state-chartered charter schools as evidenced by waivers of district policies.</p>