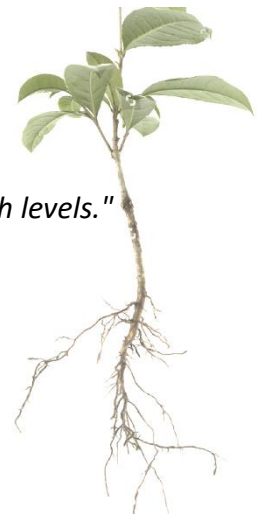


## **Raíces Del Saber Xinachtli Community School Las Cruces, NM**

*"Raíces, the school where students as well as parents feel valued as participants in the construction of knowledge, where all students are biliterate and achieve at high levels."*

August 17, 2018

New Mexico Public Education Commission  
c/o Beverly Friedman, Liaison to the PEC  
300 Don Gaspar  
Santa Fe, New Mexico 87501  
[Bev.Friedman@state.nm.us](mailto:Bev.Friedman@state.nm.us)



**Re: Raíces del Saber Xinachtli Community School (Raíces) Response to CSD's Recommendation**

Dear Members of the Public Education Commission:

This letter contains the response of Raíces del Saber Xinachtli Community School (Raíces) to the 2018 Charter School Application Final Analysis and Recommendation for Raíces (the "Recommendation") issued by the Charter Schools Division (CSD) to the Public Education Commission (PEC or "Commission") on August 6, 2018. As noted in the Recommendation, CSD has recommended to the PEC that the Commission deny Raíces' application for a state charter for the following asserted reasons:

- CSD believes that overall the application is either incomplete or inadequate; and/or
- CSD believes that during the capacity interview, the applicant did not sufficiently demonstrate the experience, knowledge, and competence to successfully open and operate a charter school.

As explained in detail herein, neither of these asserted reasons is supported by the facts. Raíces is prepared to offer an innovative, quality education to students in New Mexico and our application for a state charter should be approved.

### **LEGAL STANDARD**

Pursuant to Section 22-8B-8 NMSA 1978, a chartering authority may deny an application if:

- (1) The application is incomplete or inadequate;
- (2) The application does not propose to offer an educational program consistent with the requirements and purposes of the Charter Schools Act;
- (3) The proposed head administrator or other administrative or fiscal staff was involved with another charter school whose charter was denied or revoked for fiscal management or the

proposed head administrator or other administrative or fiscal staff was discharged from a public school for fiscal mismanagement;

- (4) For a proposed state-chartered charter school, it does not request to have the governing body of the charter school designated as a board of finance or the governing body does not qualify as a board of finance; or
- (5) The application is otherwise contrary to the best interests of the charter school's projected students, the local community or the school district in whose geographic boundaries the charter school applies to operate.

## **RAICES' RESPONSE TO CSD'S RECOMMENDATION**

As set forth in detail herein, contrary to the assertions set forth in CSD's recommendation:

- (1) Our application is complete and adequate; and
- (2) We have demonstrated that we have the experience, knowledge, and competence to successfully open and operate a charter school in Las Cruces, New Mexico.

While we acknowledge that there may be a few places where we could have been clearer or provided more information, as a whole, our application is thorough and complete. Indeed, in several places throughout its evaluation of our application, CSD remarked that our responses were both clear and comprehensive. We have taken the time to respond, in detail, to each section of CSD's Recommendation as follows.

### **I. ACADEMIC FRAMEWORK**

We have provided a detailed response to CSD's evaluation of our Academic Framework in the attached [Appendix A](#). CSD erroneously concluded that our academic framework is inadequate. As explained in detail in [Appendix A](#), this is incorrect. Indeed, Raices has developed a robust and challenging academic framework to address the needs of New Mexico students.

### **II. ORGANIZATIONAL FRAMEWORK**

We have provided a detailed response to CSD's evaluation of our Organizational Framework in the attached [Appendix A](#). CSD erroneously concluded that our organizational framework is inadequate. As explained in detail in [Appendix A](#), this is incorrect.

### **III. FINANCIAL FRAMEWORK**

We have provided a detailed response to CSD's evaluation of our Financial Framework in the attached [Appendix A](#). CSD erroneously concluded that our financial framework is inadequate. As explained in detail in [Appendix A](#), this is incorrect.

### **IV. EVIDENCE OF SUPPORT**

Although CSD determined that this section of our application was adequate, we have provided a detailed response to CSD's evaluation of our Evidence of Support in the attached [Appendix A](#).

## V. CAPACITY INTERVIEW

In the attached [Appendix B](#), we have provided a detailed response to those questions asked during the Capacity Interview that the evaluators felt we did not respond to adequately. Despite the evaluation and as explained in more detail in [Appendix B](#), we believe that we have demonstrated that we have the capacity to operate an effective, high-quality charter school.

## VI. COMMUNITY INPUT HEARING

### **Re: The Educational Program (Xinachtli Project) and its implementation in other cities**

At the July 20 hearing, the Commission asked a question about the Xinachtli Project, and on page 15 of its Recommendation, CSD states the following regarding the Xinachtli Project: “The 10 ½ year project at Canutillo Elementary in Texas was discontinued. One in Phoenix, AZ grew to become the Mexican-American Studies Program in Tucson, AZ, that was made illegal by the State of Arizona. It is currently being used by a school in East Los Angeles, CA.”

We would like to provide the following clarifying information with regards to the Xinachtli Project. In 1996 the Xinachtli Project became a program at Canutillo Elementary. A strand of bilingual classes from kinder to fifth grade would participate in 45-minute interactive presentations based on Mesoamerican pedagogy. When the Mexican American Studies program was introduced in the Tucson public schools, the organizers used Xinachtli pedagogy as a basis for their instruction. The Mexican American Studies (MAS) targeted high school students. In Arizona, the state legislature made it illegal. However, last year, after a legal battle in August 23, 2017, a federal judge [declared](#) that Arizona’s 2010 ban of the Tucson school district’s Mexican-American Studies program was unconstitutional and enacted with discriminatory intent. At the Canutillo Elementary, after 15 years of Xinachtli implementation, a new administration came, and the then-new principal believed it did not go with the curriculum and hindered preparing students for the state examinations.

The Xinachtli Project is currently in its second year as an enrichment program for all students at Bill Childress Elementary (Canutillo ISD). It is a culturally responsive pedagogy focusing on using both content and process of Mexican indigenous culture as an enrichment and academic learning (students learn Mesoamerican mathematics, science, literature, arts, and language).

For more information, please see [Appendix N: Letters of Support](#) to our Charter School Application which includes a letter from Bill Childress Elementary School, Ms. Reyna Salcedo and from the former principal of Canutillo Elementary School, Mr. Hector Giron, who witnessed Xinachtli Project during his administration on those years.

Currently, there is a kinder through 12th grade charter in East Los Angeles (Semillas Community Schools [www.dignidad.org](http://www.dignidad.org)) operating for the last 15 years in which Xinachtli pedagogy is used across the curriculum including students learning Nahuatl (Aztec) as their language.

## **Re: Business Manager Position**

At the July 20 hearing there was discussion about the our School's proposed business manager, and on page 19 of its Recommendation, CSD states the following regarding the individual that we were considering for the business manager position at Raíces: "the proposed business official for the school, who assisted with the writing and development of the application, has recently been placed on leave from another school where she was the business official after financial discrepancies were uncovered. An audit and licensure investigation is ongoing in that matter."

As noted by CSD, this is new information that has just recently become known to our School. To be clear, this individual was never hired by Raíces, nor did she hold any official position with our School. At the time that she assisted us with the development of certain areas of our application, she was an experienced and licensed business official. Certainly, now that we have learned that she has been placed on administrative leave for alleged financial discrepancies, we are no longer considering her for the position and are seeking the advice and counsel of another licensed and experienced business official. Currently, we are in discussions with the Vigil Group LLC as a potential candidate to fill this position.

The Raíces Governing Council acknowledges its own responsibility to maintain sound fiscal policies and procedures. Most importantly, our prompt response in seeking out another business official shows our commitment to ensuring that our fiscal policies and procedures are based on the professional judgment of an experienced and licensed business official. Raíces remains committed to following best practices regarding fiscal policy and to working closely with our proposed business manager.

## **VII. ADDITIONAL INFORMATION**

In its recommendation, CSD included a discussion of difficulties allegedly faced by other schools funded by the NACA Inspired Schools Network ("NISN"). It is unclear why this personalized attack on NISN is included in CSD's response to our school's application. In any event, it is completely irrelevant. NISN is simply providing financial and technical support to Raíces and does not hire staff for the School, govern the School, or make decisions regarding the School's management, governance, or policy. Accordingly, we formally request that the "Additional Information" section of CSD's Recommendation not be considered by the PEC when rendering its decision.

When rendering its decision on Raíces, PEC's sole consideration regarding financial management should be Raíces response to "III.C.(1) Financial Oversight" in the Financial Framework, and not the financial performance of other charter schools who also receive support from NISN. The PEC should only consider Raices response to "II.A.(3) New Member Process", "II.B.(2) Board Evaluation", and "II.C.(1) Board Oversight" in the Organization Framework, and not the governance challenges of other charter schools.

Financial and governance challenges are not unique to charter schools that are supported by NISN. It is extremely unfair to somehow ascribe the financial and governance challenges of the

schools named by CSD to the support that they have received from NISN. While it is true that NISN provides some support to a select network of schools, each charter school stands on its own and accepts responsibility for its own financial matters and school leadership. Raíces is no exception.

Furthermore, the charter schools listed by CSD are serving different communities in rural locations. The Las Cruces community, which we aim to serve, is entirely different than the communities served by the charter schools listed by CSD. Therefore, it is unfair to assume that the challenges faced by those other charter schools will be the same challenges that Raíces will encounter.

Consequently, it is completely immaterial that other NISN-affiliated charter schools have experienced challenges with financial management and leadership. We respectfully request that the Commission disregard the information contained in pages 18 through 21 of CSD's Recommendation when rendering its decision. We would like to emphasize that we are proud to be affiliated with and have the support of NISN, which, along with NACA, has made significant contributions to public education in New Mexico.

### VIII. CONCLUSION

We would like to thank the Commission for its hard work in evaluating our application. As demonstrated, we believe that we have presented a complete and adequate application and that we have sufficiently demonstrated that we have the experience, knowledge, and competence to successfully open and operate a charter school. Consequently, we believe that our application for a state charter should be approved.

Thank you for your consideration.

Sincerely,

/s/Jane Asche  
Jane Asche  
Governing Board Member

/s/ Lucia Carmona  
Lucia V. Carmona  
Project Coordinator

#### Co-founders:

C. Silvia Sierra	Ray Reich	Carlos Aceves	Olga Pedroza †
Wanda Bulger-Tamez	Laura Flores	Irene Oliver-Lewis	Monika García-Tellez
Nicholas Natividad	Amanda Walden	Lucia V. Carmona	Jane Asche

Cc: Charter Schools Division  
[charter.schools@state.nm.us](mailto:charter.schools@state.nm.us)

**Enclosures (2):**

- Appendix A: Raices' Response to CSD's Final Analysis of Raices' Charter School Application
- Appendix B: Raices' Response to Capacity Interview Evaluation

## APPENDIX A

### RAICES' RESPONSE TO CSD'S FINAL ANALYSIS OF RAICES' CHARTER SCHOOL APPLICATION

We have included CSD's evaluation, *highlighted in gray*, followed by Raíces' responses, in plain text. Our responses contained herein do not provide or add any new information nor do they attempt to remedy any alleged deficiency raised in the Recommendation. Rather, our responses are offered to clarify the material that has already been provided in our Application, which we believe CSD may have overlooked in evaluating our Application.

#### I. ACADEMIC FRAMEWORK

CSD concluded that this section of our application was "inadequate as only 23% of the responses were rated 'Meets the Criteria' and more than 3 areas (10 areas) were rated 'Approaches the Criteria', with a section score of 64%." As explained in more detail herein, this is incorrect. We have responded, in detail, to each area of our application where CSD rated our response as "Approaches the Criteria".

#### I.B. Mission Specific Indicators

***CSD EVALUATION: Approaches the Criteria***

*The applicant's narrative provides a mission-specific goal written in the SMART format. The goal is to attain "annual growth in Spanish by 5 points as measured by the IPT and IPT 1 and .5 annual growth in English for English Learners as measured by WIDA ACCESS 2.0." Rating categories that include measures and metrics were included. However, it is not clear how the specified goal is rigorous and attainable.*

**Raíces Response:** We provided a complete response in our application by identifying the student outcomes our school seeks to accomplish and by describing how achieving these outcomes is innovative and unique. We would like to clarify how our specific goal, which is the same target goal and growth rate specified on IPT assessments by Cien Aguas International School<sup>1</sup>, another charter school in Albuquerque which implements the 90:10 dual language model with good results, is both rigorous and attainable.

From the start of our application we stated:

Bilingualism and biliteracy are valuable, enriching, and rigorous endeavors. We want to offer the best opportunity for students to

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<sup>1</sup> Cien Aguas is an example of high levels of Spanish language acquisition. Starting two years ago, students who demonstrated readiness were able to take the AP Spanish course in 8th grade. Over the two years, 35 students have taken the course and 31 have passed the exam, earning them high school and college credit.

master two languages, English and Spanish. Two decades ago, Thomas and Collier (1997) offered educators a viable and effective alternative to transitional bilingual education through a dual language approach that research has continually validated (Dual Language Education of New Mexico, Inc.). Raíces Charter School Application Section I.A.(1) [hereinafter Application].

When students are achieving adequate progress towards biliteracy they are accomplishing a rigorous step. We are following established guidelines to measure this rigorous task which is attainable. As stated in our Application, we fully expect students to be able to transition from the language spoken in their home by an increase of 10% each year until a 50/50 use of both languages takes place in the fourth grade. As discussed in Section I.E.(1) (page 33-34) this rigorous transition is attainable according to research reported by Thomas and Collier in an 18-year longitudinal study that compared the 90:10 dual language model to all other methods currently in practice.

A point growth rate of 5 points measured by the IPT and of .5 annual growth in English for English Learners as measured by WIDA ACCESS 2.0→, a growth rate based on [research](#) on past performance coupled with an acknowledgement of the recent revisions to ACCESS (to align with CCSS), makes this growth both rigorous and attainable because of the 90:10 dual language model and the EL supports that are described in Section I-F. (2) (b).

A dual language program is defined as a program in which students learn both language and subject matter content in two languages (English and the partner language – in this case Spanish). As we noted, this is a rigorous endeavor as documented by researchers cited in Section I-A., pages 4-7. The work of both Kathryn Lindholm-Leary and the 18-year longitudinal research study by Thomas and Collier (cited in our Application on pages 4, 7, and 33-34) provide evidence that the proposed 90:10 dual language model proposed in the application is the most overall effective model for English language learners (ELLs), with student growth gains in English increasing annually over other models from kindergarten to 5<sup>th</sup> grade. This research is backed up by data shared by Dual Language Education of New Mexico (cited on page 4) which relies on the highly trusted and reliable research conducted by the Center for Applied Linguistics.

The Center for Applied Linguistics collaborates in its research with WIDA, a consortium of school districts in 39 states, that was established by the Federal Government to advance academic language development and academic achievement for linguistically diverse students. A major research project carried out by the Wisconsin Center for Education Research studying the language and academic growth for 1.5 million ELLs in the WIDA database shows a strong correlation between growth scores and economic status as gauged by students who are eligible for free and reduced lunch (FRLs), with FRLs in general performing more poorly; yet the data also shows that some schools in very low-income communities have demonstrated very high levels of performance in growth in English language skills by ELLs. Additional studies are



underway examining the methodologies used in these schools as well as very low performing schools that may account for these outcomes. The researchers hypothesize, based on past research studies, that the difference may be accounted for primarily by the methods used for dual language education programs, although many variables in the school environment will also be analyzed.

### **I.C. Curriculum/Ed Program/Student Standards**

#### ***CSD EVALUATION: Approaches the Criteria***

*The applicant provides a comprehensive explanation of the curriculum for the following content areas: Math, Literacy, Science, Social Studies, Art, PE, and English and demonstrates alignment to CCSS and NMCS. In particular, extensive information is provided to describe the Xinachtli approach. Additionally, throughout the narrative, curriculum references are made to various studies on the proposed educational model. Furthermore the curriculum concludes with a list of 16 references that all relate to research-based educational approaches.*

*However, while the applicant's response provides comprehensive information on the curricular resources that make up the school's curriculum, it does not fully detail the action steps for developing and organizing the curriculum. For example for February 2019 it states: "Develop Framework for instruction for all content areas using state standards and WIDA Spanish Language Development Standards as guides. (LCPS Math and ELA Scope and Sequence will be used as a starting point). Merge readers and writers workshop into the English Language Arts (ELA) curriculum and identify books to purchase for the book room." No additional information is provided to show how that "Framework" would be developed to ensure the curriculum aligns with with the CCSS, NM Content Standards, and the proposed school's mission. In another example, the timeline in the narrative indicates that the Curriculum and Instruction Team will meet on a monthly basis between March through May, 2019 in order to finalize the scope and sequence for all instruction units. It is not clear how the team will complete the development of the scope and sequence for all units included in the school's curriculum plan, which include Dual Language/ELA, Math, and Inquiry-based science and social studies.*

**Raíces Response:** In our Application, we provided a comprehensive explanation of the curriculum and extensive information to describe the Xinachtli approach. CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The applicant's response does not does not fully detail the action steps for developing and organizing the curriculum.***

**Raíces Response:** We disagree with CSD's evaluation that we did not fully detail the actions steps for developing and organizing the curriculum. We included a clear and realistic timeline for the curriculum development on pages 26-27 of our Application and identified who would be responsible for:

- Aligning all content to standards;
- Developing scope & sequence;
- Developing a framework for instruction in all content areas;
- Purchasing materials and accessing resources to support the curriculum (many of which have already been identified on p.23-26).

- *No additional information is provided to show how that “Framework” would be developed to ensure the curriculum aligns with the CCSS, NM Content Standards, and the proposed school’s mission. It is not clear how the team will complete the development of the scope and sequence for all units included in the school’s curriculum plan, which include Dual Language/ELA, Math, and Inquiry-based science and social studies.*

**Raíces Response:** We disagree with CSD’s evaluation that we did not show how our framework would be developed to ensure that the curriculum aligns with the CCSS, NM Content Standards and our mission. Throughout our Application, we repeatedly emphasized that we will ensure that our curriculum components are aligned with Common Core and/or NM state standards and that we will review the list of standards of Common Core and state standards for each content area we are preparing for our curriculum.

**I.E.(3) Programs Impact for Population**

***CSD EVALUATION: Approaches the Criteria***  
*The target population the school intends to serve is in Las Cruces. The applicant’s response includes demographic data based on the 2017 Las Cruces Public School data and details the percentage of Hispanic students, English Language Learners, and subgroup student populations. The response did not include student data related to attendance and truancy trends, the educational proficiency based upon enrollment at the school, or whether there is information related to other special educational needs.*

*An brief overview of the applicant’s educational philosophy and instructional methods was provided and the applicant explains how its educational model addresses the parents “desire for their children to be respected for their Hispanic heritage and language.” The applicant states, “Our goal is for them to master English while developing an equally high proficiency in Spanish. We have designed an integrated approach for them to achieve this biliteracy with much practice in listening, reading, writing and speaking.”*

*The applicant’s response provides a clear description of the daily framework a student would experience, however, it does not provide any detail on how calendar and schedule meets the students’ needs.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *The response did not include student data related to attendance and truancy trends, the educational proficiency based upon enrollment at the school, or whether there is information related to other special educational needs.*

**Raíces Response:** In our Letter of Intent (LOI), which was submitted to the Commission on January 9, 2018, we presented the most current data that is available from the Las Cruces Public Schools, including student performance data on statewide assessment. New student performance data has not yet been released to the public and therefore was not included in our Application.

On page 3 of the LOI, we stated:

The targeted student population will be the Las Cruces Metropolitan Area located in the center of Doña Ana County, 45 miles from the Mexican border. The Las Cruces Public School District is the second largest school district in the state of New Mexico and serves a majority population of 75.1% Hispanic students according to the Las Cruces Public Schools Website (<http://lcps.k12.nm.us/>). The home languages of the students are English (50.5%) Spanish (29.5%). According to the NMPED [2016-17 Report Card](#) Las Cruces Public Schools earned an overall grade of “C”. Student achievement results on the PARCC show proficiency levels in ELA and math are quite low for students in the 3rd, 4th, and 5th grades.

Furthermore, the tables provided on pages 3 and 4 of the LOI demonstrate the clear need for academic improvement.

With regards to truancy trends, Las Cruces Public Schools does not have data on this; however, in our Application, we provided information related to prevention, remediation action steps, interaction with parents, home visits, and establishment of a system of communication with the Concilio de Padres. Specifically, in Section I.E.(3) (page 43) of our Application, we described the procedures we will utilize to address compulsory attendance and to avoid truancy trends:

The Raíces philosophy of inclusion and culturally responsive approaches creates an environment of mutual responsibility for supporting student academic success. Raíces Governance Council will develop policies during the planning year to comply with the Compulsory School Attendance Law and the school will develop procedures for recording absences and verification of excused and unexcused absences. We will design a protocol for home visits to include discussions about the importance of attendance and at the beginning of the year, during the first parent/teacher conference,

school staff will dedicate time to discuss the benefits of excellent attendance.

- *The applicant's response provides a clear description of the daily framework a student would experience; however, it does not provide any detail on how calendar and schedule meets the students' needs.*

**Raíces Response:** In Section I.E.(3) of our Application (page 44), within the discussion of educational philosophy, we included a detailed description on “How Calendar and Daily Schedule Meet Needs of Anticipated Student Population.” In addition, in Section I.E.(2) (pages 39-41), we described in detail how the calendar and schedules meet the needs of students, parents, and teachers, as follows:

In the school calendar and daily schedule, we have prioritized literacy instruction and learning subject specific content in the targeted languages (Spanish/English) of desired fluency. The calendar and daily schedule include time to provide children with a variety of experiences to maximize learning. The yearly calendar (*See Appendix I*) provides time for teacher training and cooperation to strengthen instructional skills, share approaches and reflect on student performance. It also provides time for meaningful parent involvement with their children's academic endeavors and to aid faculty development. The yearly calendar provides the pacing for targeting language development and acquisition by students through a daily schedule of minutes for each language and a target of proximal development for students as the year progresses. Our Xinachtli enrichment year calendar (*Appendix M*) integrates celebrations of indigenous heritage with curriculum content related to CCSS, giving teachers and parents opportunities for further collaboration.

Furthermore, the information provided in *Appendix M* to our Application shows that we have developed interdisciplinary themes in relation to common core standards.

#### **I.F.(1a) SPED Identification**

***CSD EVALUATION: Approaches the Criteria***

*The applicant provides a clear description to address how the school plans to identify and provide instructional supports and services to students with disabilities. First, the school plans to conduct home visits and in-school orientations to get to know all of incoming students and potentially . identify students that are already on IEPs. During the first month of the school's operation, it intends to hold IEP meetings to determine what services are needed and will follow*

*the three-tier Response to Intervention (RtI) system to assess students for possible identification of special needs.*

*The process described in the narrative, known as the SAT process gathers data from the first short-cycle assessment, profile on the student, hearing and vision screening results and teacher input to identify students that may be struggling. Through a review of the documentation by the team, meetings with and consent from parents and monitoring progress withing a set time frame, the team can make a determination to formally request an evaluation for special education. The applicant describes further the process for evaluation and provides a table that indicates the school has 60 days to assess the student and complete the report with that timeframe, although in the narrative it states, "After the special education department receives the packet and once the parent has signed off on the assessment plan, the school and contracted diagnostician have 60 days to assess the student and another 30 days to write a report."*

*Although, the applicant's response provides a thorough plan for identifying students with special needs, it minimally addresses a process for identifying students for gifted education and does not provide substantial information to describe what instructional support and services will be provided to a student identified as gifted. Furthermore, the narrative does not specify what supports will be provided for the spectrum of needs that students with IEPs may present. Lastly, the narrative lacks detail on the type of training or support that will be provided to teachers and staff to ensure they are ale to fulfill their responsibilities.*

**Raíces Response:** We provided a clear description concerning our plans to provide instructional support and services to students with disabilities and a thorough plan for identifying students with special needs. CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *Applicant's response minimally addresses a process for identifying students for gifted education.*

**Raíces Response:** In response to the apparent discrepancy between the description of the timing for the diagnostician to assess and prepare a report and the chart/table that describes the process, we note our understanding of the process and clarify our thinking. In our Application we stated the following:

After the special education department receives the packet and once the parent has signed off on the assessment plan, the school and contracted diagnostician have 60 days to assess the student and another 30 days to write a report. Application, *Special Population*, Section I.F. (1) (pages 47-48).

To clarify, the term "report" refers to all reports that would be presented at an initial IEP meeting because what follows is a description of the Evaluation Determination Team (EDT) making their

decision. The EDT makes their decision at the initial IEP meeting. Therefore, the description of the process and the table/chart on page 49 is consistent with the timeframe meant to prepare for the presentation of evaluation results and an initial IEP meeting.

We identify the exceptionality of gifted as part of the overall Special Education Plan on page 48 of our Application, specifically, in the second paragraph which is identified as step 5 to the left of the paragraph. The identification process, which was noted to be thorough for students with special needs, would involve the data collection, teacher observations, and interventions. This process would be the same for students who are thought to be potentially gifted. In New Mexico, gifted is identified as having a special need.

- *Applicant's response does not provide substantial information to describe what instructional support and services will be provided to a student identified as gifted. Narrative does not specify what supports will be provided for the spectrum of needs that students with IEPs may present.*

**Raíces Response:** It was clear in our Application that all students will be included in the general education setting and provided with accommodations and modifications as much as possible in the general education setting. Certainly, this includes students identified as gifted, as it is one of the listed exceptionalities. As stated in our Application on page 51, we will evaluate, on a case by case basis, and determine those students who may need time outside of the classroom in a small group environment. The excerpt from our Application below explains that we use guided reading and math to group students based on their needs whether advanced or below.

Our school will be inclusive of all students in the general education classroom by ensuring that our teachers have knowledge of special education services and how to properly accommodate and modify curriculum. We will implement a curriculum which offers opportunities for all students to reach rigorous goals and skill sets through the use of differentiation and through the focus of “learning how to learn.” Teachers will use various strategies and tools such as scaffolding, modifications, or accommodations to reach the goals (standards) so that all students can be successful in knowing how to learn for themselves and are included in classroom learning. For example, guided reading and guided math small groups both provide opportunities for students to get instruction based on their specific academic needs. Through these groups and learning stations students receive instruction targeted toward their needs. Application, Section I.F.(1) (page 50).

- *Narrative lacks detail on the type of training or support that will be provided to teachers and staff to ensure they are able to fulfill their responsibilities.*

**Raíces Response:** We believe we provided enough detail in our Application concerning the training or support that will be provided to teachers to ensure that they are able to fulfill their responsibilities. For example, on page 51 of our Application, we stated: “Teachers will be trained how to conduct a Functional Behavior Assessment (FBA) in order to create a BIP, write accurate goals for the IEP, and determine successful strategies when working with the student. “

### **I.F.(1b) SPED Progress**

***CSD EVALUATION: Approaches the Criteria***

*The applicant provides a clear and concise description of how the school will monitor the progress of the special education students’ attainment of IEP goals and the assessment tools that will be used to determine if the goals have been met. The narrative fully describes the teacher’s responsibilities in this process. However, the narrative minimally addresses what role the administrator will have in monitoring the student’s progress and does not address how the school will evaluate the effectiveness of its special education program and services.*

**Raíces Response:** We provided a clear and concise description of how our School will monitor the process of the special education students’ attainment of IEP goals and a clear description of the assessment tools that will be used to determine if the goals have been met. CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *The narrative minimally addresses what role the administrator will have in monitoring the student’s progress and does not address how the school will evaluate the effectiveness of its special education program and services.*

**Raíces Response:** With regards to the role of the administrator in monitoring the progress of students on IEPs, we stated in our Application that the administrator will be a member of the IEP team. Therefore, by participating and preparing for meetings with IEP team, the administrator will be aware of student progress. Specifically, on page 52 of our Application, we stated:

Formal progress reports will be provided to parents at the end of each grading period (every nine weeks) to indicate how far along the student is with each goal. If a student is not showing progress, other instructional methods/interventions will be implemented and if there is still a lack of progress at the end of a nine-week grading period, an IEP meeting will be called to discuss and make necessary changes. Application, *Special Population*, Section I.F.(1)(b).

In our Application, we also explicitly addressed how we will evaluation the effectiveness of our special education program and services. On page 53 we stated: “Our school will measure the success of our special education services based on observations by teachers, the principal, or

other administrators and students’ progress on their IEP goals.” Furthermore, based on our calendar, we have created “data study days” which involves teachers, administrators and other staff reviewing student data. This is another form of monitoring the effectiveness of all our programs.

On page 61 of our Application, we elaborate on our regular meetings and describe how we will focus on students with special needs, as follows:

Each learning unit and daily lessons will then be designed with clear end-of-year student goals based on baseline data and a comprehensive view of strategic benchmarks and student learning needs. For students with special needs or for English Language Learners, our detailed assessment program supports the rapid identification of areas where students may need more support and where learning strengths can be leveraged. Regular data from classroom and school-based assessments as well as computer adaptive software (Istation and NWEA) will be used in weekly instructional planning meetings. Application, *Assessment and Accountability*, Section I.G. (1).

#### **I.F.(2a) ELL Identification**

***CSD EVALUATION: Approaches the Criteria***

*The applicant provides a concise plan for identifying English Learners (ELs) and describes that the school’s proposed 90:10 immersion educational model “has been shown to be the most effective bilingual model to achieve biliteracy and for ELs to learn English.” The applicant’s response cites research conducted by Glover and Genesee that indicates “one of the best predictors for children learning a second language is proficiency in their home language.” Additionally, the school will employ bilingually certified staff that will use the balanced literacy block and allotted 45 minutes each day dedicated to English language development to English Language acquisition and literacy skills using English Language Development Standards. Furthermore, the narrative identifies specific training and support for its teachers that are designed to support the linguistic diversity of all students, particularly ELs.*

*In regards to addressing how the students will have access to grade level content, the applicant indicates the school will provide instructional materials for core subjects in both languages and students will have access to their respective grade level content, however no additional information is provided to describe how the school will identify the content.*

**Raíces Response:** Overall, majority of CSD’s comments were very positive, noting that we provided “a concise plan for identifying English Learners” and “identified specific training and support for our teachers that are designed to support the linguistic diversity of all students, particularly ELs.” Despite most of the favorable remarks from CSD, CSD still determined that



the information included in our application was not adequate for the following reason(s), which we address below:

- ***No additional information is provided to describe how the school will identify grade level content.***

In response to CSD’s evaluation, we would like to clarify that we did in fact provide information and discussion in our Application related to how Raíces will identify grade level content. In Section I.C.(1) (pages 20-22), we explained that in order for English language learners (ELLs) to become successful, they need to learn grade-level content as well as the English language skills needed to access that content. In addition to the one-hour of explicit English Language instruction, Raíces will teach content rich Science, Social studies, Art & PE by helping EL students:

- identify relevant vocabulary, using charts & other GLAD strategies
- teaching specific skills for navigating text
- using hands on experiences in the stations to connect words with meaning
- accessing students’ prior knowledge

Raíces will implement thematic units of study. An example of thematic units of study can be found in Section I.B.(1) (page 20) of our Application, where we provide a description of the science unit that begins with accessing prior knowledge and examining the study of rivers. Inquiry is used to examine complex phenomena that are not controlled. For example, we might begin by asking, “What is a river?” After dialogue, the teacher might ask, “What do you know about rivers?” This type of exploratory discussion leads from assessing prior knowledge to creating shared knowledge. These questions can lead to more focused inquiry such as, “What can rivers be used for?” or “Do rivers need to be protected?” This process can also be the basis for a project or designing an experiment. Another example follows on page 22 of our Application, for the social studies unit on celebrations in different cultures.

In Section I.C.(1) (page 23) of our Application, we describe English Language Development curriculum and specifically state: “Lesson planning will use the content presented in other areas (math, reading, writing, Xinchtli) as a context for English development instruction.”

### **I.F.(2b) ELL Progress**

#### ***CSD EVALUATION: Approaches the Criteria***

*The applicant’s response provides a brief overview of the school’s process to monitor the progress and language acquisition of ELs. The applicant explains how teachers will meet as a team weekly to work as a professional learning community to focus on effective core instruction and use data to inform instructional planning. However, the narrative does not clarify the specific responsibilities for the teachers in the team. Another example in the narrative describes that progress of students will be reviewed monthly by the Curriculum-Academic Performance*

*Committee but does not address what specific responsibilities this committee will have in reviewing the data and informing on the data.*

*Overall, the statements provided in this narrative address a high-level overview of the school's process.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The narrative does not clarify the specific responsibilities for the teachers in the team.***

**Raíces Response:** On page 58 of our Application, we clearly described the specific responsibilities for teachers as follows:

- focuses on skill building related to each of the four language domains: listening, speaking, reading and writing;
- maintain data folders with student information;
- determine reading groups, station work; and
- appropriate differentiation.

- ***The narratives does not address what specific responsibilities the Curriculum-Academic Performance Committee will have in reviewing the data and informing on the data.***

**Raíces Response:** On page 58 of our Application, we clearly delineated the specific responsibilities the Curriculum-Academic Performance Committee will have in reviewing the data and informing on the data, as follows:

- review classroom practices;
- review annual WIDA ACCESS results;
- determine the needs for teacher support as either whole school PD or individual teacher coaching; and
- assess the effectiveness of instructional materials.

### **I.G.(1) Assessment Plan**

***CSD EVALUATION: Approaches the Criteria***

*The applicant has developed a clear and cohesive plan that aligns with the assessments identified, and the proposed school's mission and target student population. The proposed assessment calendar aligns to the proposed school year calendar. The assessment tools included distinguish the various categories of student populations and accounts for all NM state mandated tests. However, the applicant's response lacks clarity in explaining how the results for each assessment will inform instruction.*

**Raíces Response:** Overall the feedback from CSD on this section of our Application was positive, noting that we have “developed a clear and cohesive plan that aligns with the assessments identified” and with our mission and target student population. CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The applicant’s response lacks clarity in explaining how the results for each assessment will inform instruction.***

We believe that our Application was clear in explaining how the results for each assessment will inform instruction. Specifically, in Section I.G. (1) (pages 64 – 66), in the final column, we list how assessment data will be used. The specific uses include: placement, informing lesson plans, intervention, exit tickets and/or station content. Our school philosophy guides us to be careful about “knee-jerk” responses to our children’s progress. Our assessments give us general information augmented by teacher reports and parental comments. It is not our purpose to react to “each” assessment, but rather for the results to be a basis upon which we continue our dialogue among administrators, teachers, students and their parents. This is part of our community-based model. As stated in the Guiding Principles for Dual Language education, “an environment that facilitates learning requires equity among all groups...”

The assessments that will be used by Raíces offer various points for data. IStation and NWEA are short cycle assessment given throughout the school year to gauge the progress students are making in skill development for language development (reading, writing) and mathematics Standards-based assessments developed by the curriculum team provide teachers, parents, and administrators monthly feedback on students’ understanding of key concepts that are developed within each instructional unit. The data from standards-based assessments helps teachers understand the strengths of each instructional unit, and how instruction must be modified to ensure proficiency of the standards for all students. It also helps teachers to identify students that may need additional instructional support to related to the target standards for each unit. Access and IPT provide data on children’s progress in developing English and Spanish proficiency.

## **I.G.(2) Assessment Data**

### ***CSD EVALUATION: Approaches the Criteria***

*The applicant’s narrative details a process for how assessment data will be used and includes action steps for implementing its corrective actions. The process outlines the corrective actions at the school, curricular, and individual level. Additionally, the narrative describes how data would trigger the course to prompt actions and identifies who the responsible parties are. However, the applicant does not provide information on the specific timeline and associated costs that go along with the corrective actions described. Furthermore, the narrative does not provide a process for regularly evaluating the effectiveness of its academic program generally and the effectiveness of specific correction actions or interventions. Lastly, it is not clear in the narrative whether the described processes meet state requirements.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *The applicant does not provide information on the specific timeline and associated costs that go along with the corrective actions described. The narrative does not provide a process for regularly evaluating the effectiveness of its academic program generally and the effectiveness of specific correction actions or interventions. It is not clear in the narrative whether the described processes meet state requirements.*

**Raíces Response:** The timelines for data collection are included in the tables listing each assessment in Section I.G.(1) of our Application (pages 62-66). All forms of assessments (i.e. teacher reports, portfolios, report cards) are designed in consultation with members of the team who are current teachers or administrators in the public schools.

“Data days” are clearly specified in our calendar included in Section I.E.(2) of our Application (pages 38-39). The data days are one and a half weeks prior to report card/ parent /teacher conference days in the fall to build necessary staff time data interpretation. In the spring, the timeline between data days & parent/ teacher conferences/report card days is shorter.

In relation to cost, the Data Days that are used to analyze student data, take corrective actions regarding school curriculum and instruction are built into the teacher contract day. Additionally, we have made time during each week for teachers to collaboratively plan instruction and curriculum units. This planning is informed by the analysis of data that is used to determine curricular strengths and weaknesses and individual student learning needs. Since the Data Days and extensive planning time is built into the contract day, no additional cost is incurred.

### **I.G.(3) Assessment Communications**

***CSD EVALUATION: Approaches the Criteria***

*The applicant provides a plan of regular communication of student assessment and progress. The plan directs communications to the students up through the New Mexico Public Education Department and the broader community. Students will receive information through dialogue on their learning via data folder reviews, assessment feedback, report cards feedback and projects. Parental communication efforts include parent-teacher conferences and monthly events. Although, the applicant has identified modes of communication, the narrative does not clarify how the communication plan is specified for each source of student achievement data included in H.(1).*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *The narrative does not clarify how the communication plan is specified for each source of student achievement data included in H.(1)<sup>2</sup>.*

The Application question did not specify that we focus on “each” source of student achievement data. Our plan is specific about our communication process to our assessments, the art of dialogue through which we practice intentional listening and provide feedback. This we will do with our students, parents, among teachers and administrators, and at all levels of communication. In Section I.G.(3) of our Application (page 73) we state:

Role of Dialogue in Communicating Assessment Data to Students:

Understanding and practicing the concept that while one person is talking, the other is listening gives a conversation a formal structure that transforms it into a dialogue. At Raíces we are mindful to practice this authentic listening when we are talking with our students about their progress. Purposeful communication with students through dialogue about their learning will include the following:

1. Data folder reviews
2. Assessment (interim and standardized) feedback
3. Report cards feedback
4. Projects

## II. ORGANIZATIONAL FRAMEWORK

CSD concluded that this section of our application was “inadequate as only 41% of the responses were rated ‘Meets the Criteria’ and more than 3 areas (13 areas) were rated ‘Approaches the Criteria’, with a section score of 68%.” As explained in more detail below, this is incorrect. We have responded, in detail, to each area of our application where CSD rated our response as “Approaches the Criteria”.

### II.A.(3) New Member Process

***CSD EVALUATION: Approaches the Criteria***

*The applicant's response provides an adequate plan for selecting initial governing body members that includes succinct action steps and timeframes by which the Governance Board Development Committee must complete them. The brief description in the response addresses when announcements will be placed, indicates data will be used to make determinations on the skills and qualifications needed, the timeframe by when candidates will be recommended to fill vacancies, and when applications will be screened to replace outgoing members. It is unclear*

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<sup>2</sup> CSD referenced I.H(1); however, there is no I.H.(1). We assume CSD was referring to I.G.(1) and the table on pages 62-63 which list all of our assessment tools.

*how the committee will implement each action step or what the process will be to recruit and evaluate new members.*

*Furthermore, the applicant has not identified a complete process for regular and on-going recruitment. Based on the narrative it is activated only when a vacancy appears on the board. Additionally, the applicant did not provide a fully-detailed process for vetting its potential members to ensure they meet the credentials and experience the board is seeking.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *It is unclear how the committee will implement each action step or what the process will be to recruit and evaluate new members. The applicant has not identified a complete process for regular and on-going recruitment. The applicant did not provide a fully-detailed process for vetting its potential members to ensure they meet the credentials and experience the board is seeking.*

**Raíces Response:** The Governance Board Development Committee (GBD Committee) is a standing committee which means that it will meet monthly or more often, as needed, to keep a group of qualified and vetted candidates in the pipeline and ready to fill vacancies or expired terms. As discussed in further depth in the table provided in Section II.A.(2) (pages 98-99) of our Application, the GBD Committee has a specific timeframe for advertising and recruiting for potential board members that demonstrate the necessary qualifications. *See also* Bylaws, Appendix A: Bylaws, (Article 5: Section 5.2) (page 11). The timeframes on page 98 indicate the time by which certain actions will be completed, signifying the ongoing nature of this work throughout the year and the point in which the task must be completed. The “Selection of Board Members” section of our Application and the detailed table included in that section demonstrates our process for regular and ongoing recruitment. Therefore, CSD was incorrect in its evaluation when it stated that we did not identify this process. Raíces understands the importance of securing additional board members beyond the seven (7) required by our Bylaws to ensure that board members have the in proper skill set and to fill vacancies or replace members whose terms have expired. Both in the description of the work of the Committee on page pages 98-99, Section II.A.(1) and on page 99, Section II.A.(3) we discuss in detail the vetting process (although we did not use that term) in the first 3 paragraphs under the title **Further Elaboration of the Process**.

## **II.B.(2) Board Evaluation**

### ***CSD EVALUATION: Approaches the Criteria***

*The applicant's response provides a limited plan regarding the annual self-evaluation for the governing body because the applicant indicates the plan will be finalized during the planning year. The narrative does outline general steps for developing a plan to support the school's mission that should include steps members will implement and provide a plan for ongoing*

*monitoring to evaluate its progress. However, it does not fully describe the action steps, specific timelines or identify those responsible for implementation and evaluation of the board's plan.*

*A significant portion of the narrative includes guiding questions the board intends to use in the development of its plan for obtaining feedback and evaluating the effectiveness of the governing body. However, no responses to their questions are provided in the narrative to identify how the applicant has thought through the specific steps, timelines and responsibilities as it relates to its school and the fulfillment of its mission.*

*Lastly, the applicant's narrative does not address how the board will focus on and support continuous improvement. The applicant states, "this cycle of self-assessment needs to be repeated every year to develop a pattern of continuous improvement in the governance process from year to year. Having goals, objectives, activities, and data collection plans in place annually will be critical to stay on track for a successful application for renewal of the charter five years (plus a planning year) after the initial charter approval." No additional details on the the goals, objectives, activities, and data collection were provided to understand the specificity of the board's plan.*

**Raíces Response:** Based on CSD's evaluation, it appears that CSD determined Raices' response was not adequate for the following reason(s):

- ***The narrative does not fully describe the action steps, specific timelines or identify those responsible for implementation and evaluation of the board's plan. No responses to the board's guiding questions are provided in the narrative to identify how the applicant has thought through the specific steps, timelines and responsibilities as it relates to its school and the fulfillment of its mission. The applicant's narrative does not address how the board will focus on and support continuous improvement. No additional details on the goals, objectives, activities, and data collection were provided to understand the specificity of the board's plan.***

We acknowledge that it is a shortcoming of this section that we did not include the table we developed which summarized specific action steps we will take, who will be responsible for each step, within what timeframe, and the criteria and standards for each set of data. However, we are aware that it is important for the Board to be able to analyze all monitoring data against standards that reflect the achievement of the school mission, academic goals, sound financial practices and management, and compliance with all state law relative to school board functions and school management. To this end, we have been studying the board evaluation criteria and indicators that are posted as good examples on the website of the National Association of School Boards, including those of the Iowa and Minnesota Associations of School Boards. If our charter is approved, we will also join the NM Association of School Boards which provides a Board Self Evaluation Model Toolkit to its members.

## II.C.(1) Board Oversight

### ***CSD EVALUATION: Approaches the Criteria***

*The applicant's response provides a limited plan for monitoring the academic, financial and organizational performance of the school because it lacks the specificity of the timelines and criteria or standards used during the monitoring and evaluation process.*

*The applicant indicates the school's academic dashboard will focus "key components or indicators with at least one measure for each indicator." The indicators include: reading, writing, speaking, and listening achievement (the language arts skills); math achievement; science achievement; individual education plan status; English and Spanish learner education status; and achievement measures correlated with ethnicity, income and language status. However, the table or narrative do not address the criteria or standards that will be used to ensure the board is "well-informed on the outcomes of these assessment in order to hold the principal accountable for the academic and mission related outcomes of the school." The table provided does identify the assessment tool, when data will be accessible to the board and what information will be reported to the Board. These assessment tools and results do align with several of the key components noted in the narrative.*

*The applicant's response to monitoring the organizational and financial performance of the school minimally addresses the process the Governance Board will use to oversee and monitor its performance. Although the applicant has identified indicators that will be monitored and evaluated, the narrative lacks information on the timelines and criteria or standard that will be used to determine the school is fulfilling its mission.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The table or narrative do not address the criteria or standards that will be used to ensure the board is "well-informed on the outcomes of these assessment to hold the principal accountable for the academic and mission related outcomes of the school. The narrative lacks information on the timelines and criteria or standard that will be used to determine the school is fulfilling its mission.***

**Raíces Response:** In Section II.C.(1) of our Application (page 108, paragraph 2), we stated: "data will be reported and discussed monthly at the Board meetings on academic, organizational, and financial performance." On page 109, we state the tracking of academic data will be done "using assessment tools/indicators that have been carefully identified in the academic framework to inform instruction and meet state requirements that align with the CCSS and other NM performance standards [for curriculum content areas]." In the table on pages 109-110, the last column indicates when the data on the specific indicators for performance will be available to the Board. Furthermore, in the second paragraph on page 108, we also state the following: "As we discover Raíces academic, organizational, and financial strengths and weaknesses, we will gain insight into how to guide policy decisions to improve achievement of the school's mission and



goals for high academic performance”, which is a key component of our mission. Lastly, following the table on pages 109 and 110, we stated:

This array of measures and tools will allow the Board to analyze and discuss whether achievement of the key components of the Raíces Mission is in progress throughout the year and from one year to the next. The Board will be watchful to see that benchmarks for progress as specified in the goals and indicators in the Academic Framework are being achieved at the specified rate.

On page 111 under **Monitoring of Organizational Performance** we explained that the Governance Development Committee will provide oversight to see that qualified Board Members are “constantly being sought out and recruited to replace vacancies on the Board. This committee will keep an inventory of skills needed on the Board and work to make sure that current and new board members together possess a complete complement of the list of needed skills to do a good job of Governance.”

On page 111 in the paragraph starting with Monitoring and Supporting School Leadership, Staff and Parents Needs we further explained that these needs will be monitored monthly and reported to the board by the Principal, School Development Committee and Parent’s Council. On page 111 and 112 we do give timeframes for the Monitoring of Financial performance through monthly financial reports and stating who is responsible.

We realize that we should have put the above information in a table for easy review; however, it is spelled out in the narrative. We also realize that all tables should include a column that is tied back to specific criteria and standards.

## **II.C.(2) Hiring Head Administrator**

### ***CSD EVALUATION: Approaches the Criteria***

*The applicant's response provides a clear timeline for hiring a head administrator, both for the initial hiring and for any time the position becomes vacant that includes a complete process identifying the action steps and persons responsible. The board expects to have the head administrator hired by January 8, 2019 and no later than July 1, 2019 (“Should it take longer to find a suitable candidate”).*

*However, the applicant’s narrative does not specify the criteria or standards used in the screening tool since the tool has not been established. According to the applicant, “.. a screening tool will be established with criteria and ranking based on job description and Board expectations of this position. Because we are applying for a planning year, this first step of the process will start no later than the first week of September 2018.”*

*Although the narrative provides the preferred skills/experience required for a head administrator, it did not explain why and how those skills/experiences ensures the school leader has the capacity to operate a success, high-quality public school or how it takes into account the mission of the school.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *The applicant's narrative does not specify the criteria or standards used in the screening tool since the tool has not been established. The narrative did not explain why and how the preferred skills/experiences required for a head administrator ensures the school leader has the capacity to operate a success, high-quality public school or how it considers the mission of the school.*

**Raíces Response:** The job description we provide in Appendix B of our Application was designed to align with applicable statutes and regulations as well as with our mission statement. In developing the job description, we referenced the following state statutes and regulations: Section 22-5-14 NMSA 1978 (Local Superintendent Powers and Duties); Section 22-10A-18 NMSA 1978 (School Principal Duties); and Section 6.29.1.9 NMAC (Duties and Powers of the Administrator of a Charter School). In addition, the job description that Raíces has developed expressly requires that the principal have a NM Administrative License (3B), which aligns with state standards. Furthermore, the licensure requirement ensures that the principal is capable of the leadership needed to manage and lead staff in successfully achieving the mission and goals that undergird the philosophy of the school. Lastly, in the job description that we have developed, under the Leadership Characteristics required for the job, we specify that any candidate for the position must demonstrate that his/her educational philosophy aligns with the school vision and mission.

The screening tool we talk about will be based on these requirements and standards which we have stated in our Application as detailed in the paragraph above as well as the evaluation rubric for the principal based on the four domains of indicators found on pages 121-122 of the application. As indicated on page 121 these evaluative indicators of performance are found in the NM Principal Leadership Competencies and Indicators (NMPLCI) as required by law in the regulations (i.e. Section 6.69.7.9 NMAC) for the educational leader of the school.

#### **II.C.(4) Principal Evaluation**

***CSD EVALUATION: Approaches the Criteria***

*The applicant's response provides a clear plan for evaluating the principal and lists the components and instruments that will be used to evaluate this position. The narrative details an annual process that begins during the hiring process which is when the expectations are set and continues with a mid-year and final formal evaluation. The plan outlines the responsibilities of the board members in this process and meets state requirements.*

*However, it was not clear how the plan addresses the mission and goal of the proposed school.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *It was not clear how the plan addressed the mission and goal of the proposed school.*

As explained in detail herein and as provided in our Application, we provided a focused plan to make sure that the principal is evaluated for his or her work in accomplishing the school mission and goals. We can see in retrospect that we should have included a note about all this in the chart on page 124 which shows the board moving through the evaluation steps of the HOUSSE P evaluation procedures, especially step 3 in which the Board will “identify potential data sources for collecting evidence of principal competencies and progress on goals”. This would have been a reminder to the reader of the indicators of performance which is a key part of the principal evaluation.

To clarify, although not explicitly stated in the HOUSSE Evaluation Action Steps, in Section II.C. (4), the evaluation of the principal takes place using the rubric explained on pages 121- 122. On page 121 of our application, we specifically provided the following:

The evaluation will be based on 1) performance goals related to the job description (Appendix B) agreed upon in the principal contract, 2) progress on accomplishment of the Raíces Education Plan for Student Success (EPSS) which incorporates all the elements of the School’s Mission and goals, and 3) evaluation of principal’s performance in the four domains of NM Principal Leadership Competencies and Indicators (NMPLCI) as required by law (NMAC 6.69.7.9). The four domains of leadership competencies and indicators are as follows

Below, we have included information from our Application that shows all the ways that this rubric, which contains the indicators for evaluating the principal, includes information on the achievement of the mission and goals of the school.

***Domain I: Instructional Leadership***

1. *The principal promotes the success of all students by maintaining a culture that supports student achievement, high quality instruction, and professional development to meet the diverse learning needs of the school community. To assess this competency the principal will be rated on the following indicators:*
  - a. *works with all members of the Raíces community to make quality instruction a prime focus ensuring that the school successfully implements the dual language*

*program, balanced literacy, and the Xinachtli pedagogical practices and curriculum.*

- b. uses accountability literacy standards in making decisions about student success and achievement.*
- c. evaluates teachers using the New Mexico 3-tier licensure performance evaluation system to promote high quality teaching and professional learning and to assess teacher capacity to achieve the innovative features of the Raíces academic plan.*
- d. incorporates the diversity of the student population and history of the school community in making curricular and school policy decisions which are consistent with the Raíces mission and the charter contract.*

All four of these indicators relate directly to the schools mission and mission specific goal stated in Section I.A. (1) & B.(1). Also see below Domain III regarding indicator c.

**Domain III: Professional Development**

- 3. The principal organizes and coordinates ongoing professional learning opportunities that are aligned with the New Mexico professional development framework in NMAC 6.65.2 and supports the diverse learning needs of the school community. To assess this competency the principal will be rated on the following indicators:*
  - c. implements comprehensive, integrated and systematic ongoing professional development opportunities for faculty and the Raíces community that increases their capacity to accomplish the unique aspects of the Raíces mission, curriculum, and academic plan for student success....*

**II.D.(1) Organizational Structure**

**CSD EVALUATION: Approaches the Criteria**  
*The applicant’s organizational chart has clearly delineated the reporting structure for most of the positions and relationships related to the school’s operations. However, based on the narrative and the organizational chart it was unclear how the Director of Operations and Community Engagement communicates with the Concilio.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***It was unclear how the Director of Operations and Community Engagement communicates with the Concilio.***

The question on the application stated that we must provide “a clear, comprehensive, cohesive and reasonable organizational chart and narrative that aligns structures with the mission of the proposed schools and demonstrates a clear understanding of appropriate relationships between governance, administration, teaching, support, staff, and external agencies that are essential to the proposed school.” Overall, we believe that our response provided in our Application

accomplishes this. CSD's concern that we did not clearly address the lines of communication between the Director of Operations and Community Engagement and the Concilio de Padres/Parents Council is easily addressed by looking at Appendix K, in which we show a two-way arrow with a dotted line, signifying communication between the Director of Operations and Community Engagement and the Concilio. With regards to the Director of Operations and Community Engagement, on page 128 of our Application, we state the following:

[The Director of Operations and Community Engagement] will be responsible for working with the principal to develop a comprehensive Community Based Engagement Plan (CBEP) which includes the community at large. The plan will be implemented to ensure meaningful participation including, but not limited to, an active and committed Parent Council. This staff position is critical to engaging parents and community to support their children's achievement by creating an open school environment for K-5 students.

#### **II.D.(2) Staff Job Descriptions (Appendix C)**

***CSD EVALUATION: Approaches the Criteria***

*The applicant's narrative provides an brief overview of all key staff positions that align with the organizational chart and the school's first year operation. The narrative also differentiates between FTE and contracted positions.*

*However, the applicant's narrative lacks specific details on the license requirements for a Pre K - 12 Educational Assistant and does not identify the reporting lines for the business manager, Certified Bilingual Teacher, Special Education Teacher, and Educational Assistant in the narrative and the job descriptions for the identified positions.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The applicant's narrative lacks specific details on the license requirements for a Pre K - 12 Educational Assistant. The applicant's narrative does not identify the reporting lines for the business manager, Certified Bilingual Teacher, Special Education Teacher, and Educational Assistant in the narrative and the job descriptions for the identified positions.***

**Raíces Response:** At the beginning of the job descriptions in Appendix C, the heading states that the Job Descriptions are for "Certified, Licensed Key Staff." To clarify, this applies to all job descriptions that follow in Appendix C and provides that all positions must have the appropriate certification and licensure requirements.

The reporting lines are shown in the organizational chart (Appendix K) which indicates that the Curriculum and Instructional team, Director of Operations and Community Engagement, and

Contractual Services, which includes the Business Manager, report directly to the principal as shown by the solid lines going up to the principal. It may have been hard to see since the line in the middle of the page was lighter than others. In the Leadership and Management section, which is Section II.C.(3) of our Application (page 117), we stated that the “principal serves as the primary leader and manager of programs, staff and students.” Further, on page 119, we clarified the lines of reporting under the subtitle “Personnel Responsibilities” of the principal. This is part of the comprehensive job description that the Board uses to convey to the principal his/her roles and responsibilities and that makes it clear that the entire instructional team and business manager report directly to the principal who oversees their management and professional development.

### **II.D(3) Staffing Plan**

#### ***CSD EVALUATION: Approaches the Criteria***

*The applicant has sufficiently described a staffing plan that includes at a minimum, action steps, timelines and responsible parties for its hiring process and outlines growth over time. The chart provided in narrative provides action steps in the initial hiring phase and beyond. Additionally, each year the school plans adequate growth by adding a grade until the end of the 5th year to allow staff to gain experience on the implementation of the curriculum and manage the strategies necessary to achieve the school’s mission.*

*However, the applicant’s response provides a minimal description of a plan for how the school will adjust the staffing needs to respond to budget shortfalls.*

**Raíces Response:** The staffing plan that we provided in our Application was sufficient and included action steps, timelines, and responsible parties for the hiring process and outlined growth overtime. CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The applicant’s response provides a minimal description of a plan for how the school will adjust the staffing needs to respond to budget shortfalls.***

In Section II.D.(3) (page 133, 4th paragraph), we state the following:

In the event that student enrollment does not meet projections, the school will consider revisions to the plan, for example the board may determine that the school may be unable to afford a Testing Coordinator and those responsibilities will remain a part of the Principal’s job responsibilities.

Additionally, under the Financial Framework section of our Application, specifically Section III.B.(4) (page 194-195) under the heading **Meeting Unforeseen Budget and Cash Flow Challenges**, we describe in great detail how we will adjust the budget if our enrollments are off or if there should be a cash short-fall due to a number of factors. Specifically, we state on page 195: “We will plan for these expenses through other sources of funding which we have been

actively pursuing already and have already received confirmation from several Foundations that they will be supporting Raíces if the charter is approved.” These include the W.K. Kellogg Foundation, the McCune Foundation, the NACA Inspired Schools Network and the Raza Development Fund, whose letter of support was received one day after the application was submitted.

#### **II.D.(4) Staff Professional Development Plan**

***CSD EVALUATION: Approaches the Criteria***

*Overall, the applicant’s plan for professional development includes sufficient elements that focus on specific areas within set timelines that meets most state requirements. The narratives describes how the school will ensure professional development time is not used during routine staff meetings. Instead, the professional development will take place 3 weeks prior to the school year and through out the year. Additionally, the applicant provides a schedule for the year.*

*However, the plan lacks any detail on how the general professional development plan and mentorship plan are supported by a budget and the process used to address specific professional development needs that are teacher-specific. Although the narrative states, “Mentoring sessions will be tailored to individual teacher needs”, it does not include the action steps and associated costs on how those needs will be identified.*

**Raíces Response:** Overall, our plan for professional development included adequate elements that focused on specific areas within set timelines. CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The plan lacks any detail on how the general professional development plan and mentorship plan are supported by a budget and the process used to address specific professional development needs that are teacher-specific. The plan does not include the action steps and associated costs on how those needs will be identified.***

Our Application does not specifically spell out the budget aspect for Professional Development other than to include \$500 per staff person for professional development because the budget will not include federal funds in the initial years; therefore, we will need to write in funds for some of those costs through NACA and other grants. The Dual Language Education of New Mexico organization will provide an intense training before school opens to provide support to teachers on development of the Dual Language 90/10 program with a cost of \$4,000, which will need to come out of grant funds.

Also, in [Appendix O: Staffing Plan](#), we allocated a part time “Culture and Curriculum Coach”, a Teacher Leader who will take the responsibility to coordinate mentorships and monitoring of performance among the instructional team working in partnership with the principal.

In Section D.4 (page 136), we stated the following:

The school calendar also includes time for teachers to meet weekly (Thursday afternoon) in professional learning communities. These half days will be designated for teacher collaboration on developing weekly learning goals, analyzing classroom assessment data, and planning instruction and interventions to meet student learning needs. Teachers will also be supported by Indigenous Culture pedagogy expert (Carlos Aceves\*) to ensure that instruction is aligned to Xinachtli learning philosophy, constructivist learning theory, and the learning needs of students.

## II.F.(1) Community/Parent/Employee Involvement in Governance

### ***CSD EVALUATION: Approaches the Criteria***

*The applicant's response provides a clear plan for communicating and inviting families to participate in the Parent Council, which "will be the mechanism for parents to participate in designing, planning, and implementing the guiding principles of the school" as well as other opportunities to serve on the board and through school events. Although the applicant has described several opportunities for parental attendance, the applicant does not provide a compelling response to addresses how these opportunities are meaningful for parental input, professional educator input and community input. For example, the applicant states, "The Governance Board will hold one seat for a parent member as a means of parent input and participation in the operations of Raíces", however, the response does not elaborate on how it will help further the school's mission.*

**Raíces Response:** We provided a clear plan for communicating and inviting families to participate in the Parent Council. CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The applicant does not provide a compelling response to addresses how these opportunities are meaningful for parental input, professional educator input and community input. The response does not elaborate on how it will help further the school's mission.***

We do not agree with CSD's evaluation that we did not provide a "compelling response" to address how these opportunities are meaningful for parental input. As noted in our Application, the Parent Council is an integral element of the operation of our school. In Section II.F.(1) (page 150) of our Application, we detail the role of the Director of Operations and Community engagement in working with the Parent Council. In the first paragraph of that section, we state:

The Director of Operations and Community Engagement will identify parent leaders to convene and organize the Parent/Community Council. In addition, the parent/community



strategy will incorporate a bilingual, bicultural and culturally appropriate communication system by seeking their input on the best means of communicating and implementing multiple strategies including: home visits, newsletters, robocalls, phone calls, emails and other social media. Also, we will refine our system of communication under a continuous improvement framework between teachers, students, parents and administrators to address and overcome any challenges and limitations as the school community evolves.

We further state in paragraph 2 on page 151 that the “Parent Council is part of the essence of Raíces that will guide achievement of the mission of the school and ensure the environment and curriculum is grounded and rooted in appreciation of each student’s cultural heritage in a way that will be transformative for parents, students, and faculty. Cultural heritage and positive identity transformation, as key guiding principles, will be embraced and embedded within the parent and child relationship.” These are key aspects of the mission statement and as parents participate in dialogue, which is a key strategy at Raíces for building relationships, they will be guiding input about how the major aspects of the mission can be accomplished, in particular how “parents are valued in construction of knowledge and the creation of a learning community that promotes high academic performance, positive identity formation and the reclaiming of cultural heritage” – key components of our mission statement. The community engagement plan that the Director of Operations and Community Engagement is responsible for developing and has been described in other sections of the application (*see* page 85-86) allows staff and community members to participate in designing strategies for achievement of the Raíces mission.

Early in our Application, we described what it means to implement a community-led model, as follows:

Community-Led Model: We will create opportunities for parents to exercise leadership and grow in their advocacy skills for navigating the educational systems throughout their children's lives. A Parent Advisory Council will be instrumental for ensuring parents participate in planning and implementing the core values of Raíces. Parents, along with the Parents Council [which includes a teacher representative] will be instrumental in creating interventions, such as after-school and weekend tutoring. They will be involved in planning, organizing, and promoting cultural events after hours or on Saturdays to support Raíces culture and values” which are directly related to the school mission. Application, *Mission*, Section I.A.(1) (page 6).

## II.G.(1) Recruitment Plan

### ***CSD EVALUATION: Approaches the Criteria***

*The applicant's response describes a prospective student outreach and recruitment plan, including action steps, timelines, and responsible parties. The plan proposes to reach its recruitment targets within the 9 month timeframe of September, 2018 to May, 2019.*

*Additionally, the applicant describes that the database for recruitment will be used to compare enrollment numbers with recruitment strategies on a monthly basis. The results will be used to determine if the school must increase its recruitment efforts to provide equal access to its targeted students. However, it is not clear if the "documented responses of parents and children attending outreach and recruitment community events" is separate from the data used in the prior statement and how this data will inform the school annually on the effectiveness of the outreach and recruitment efforts in ensuring equal access to the school and how the school will use that information to adjust the outreach and recruitment plan.*

*Lastly, this plan describes the multiple recruitment activities that will take place, but does not identify the costs associated with those activities.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *It is not clear if the "documented responses of parents and children attending outreach and recruitment community events" is separate from the data used in the prior statement and how this data will inform the school annually on the effectiveness of the outreach and recruitment efforts in ensuring equal access to the school and how the school will use that information to adjust the outreach and recruitment plan. The plan does not identify the costs associated with those activities.*

From the beginning, the Raíces founders have understood that many of the extra costs associated with the start-up of a charter school will not be covered directly from the State Budget. Therefore, the founder team dedicated a significant amount of time to engaging potential funders that would be able to fund those expenses that will not be covered by the State. Costs for the recruitment and enrollment process are one of those things for which we anticipate requesting funds. We believe that expenses for print materials and the various social media activities we have described in the table on pages 157-158 will not exceed \$1,000 because of the number of organizations that have promised in-kind services and access to their early childhood Pre-K student families to conduct recruitment sessions. See Appendix N: Letters of Support; Section IV.B.(1), *Community Support* (pages 208-21).

Five foundations have been approached and, at the time of the submission of our application, two major foundations, W.K. Kellogg and McCune Foundations, had provided letters of support (*see*

Appendix N: Letters of Support), indicating we would receive significant support and could submit grants immediately upon approval of the charter. We are in the process of developing budgets for all that we anticipate will be needed including some of the costs associated with recruitment. Also, some initial costs for recruitment activities can be part of the \$50,000 that will be provided by the Native American Community Academy, immediately upon approval of the charter. We have also had positive conversations with the Community Foundation of Southern NM and the Abelard Foundation Peace Development Fund as reported on page 210 of our Application.

## II.K.(2) Food Service

### ***CSD EVALUATION: Approaches the Criteria***

*The applicant's food service plan provides a clear and concise plan for providing food services that comply with federal and state requirements. Specifically, the plan identifies the equipment needed for a multi-use area and has identified Cravings Café as the potential vendor.*

*However, the response does not adequately identify how the school will fund the food service plan costs prior to receiving any applicable reimbursements as evident from the following statement, "Raíces will be responsible for all reporting requirements and anticipate that we will have to cover costs for meal payments until reimbursements for programming from the government are received." No additional information was provided to describe how the school plans to cover those costs.*

**Raíces Response:** In our Application, we provided a clear and concise plan for providing food services, which, most importantly, complies with federal and state requirements. CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The response does not adequately identify how the school will fund the food service plan costs prior to receiving any applicable reimbursements as evident from the following statement, "Raíces will be responsible for all reporting requirements and anticipate that we will have to cover costs for meal payments until reimbursements for programming from the government are received." No additional information was provided to describe how the school plans to cover those costs.***

To be clear, we did address the funds for food services costs. The grant sources enumerated in our Application (i.e. W. K. Kellogg and McCune) are sources of funding to support costs associated with food as shown in the letters of support in Appendix N. Funds from the NACA Inspired Schools network will also be used. These sources will be tapped until applicable government programs can be accessed. In Section III.K.(2), page 171) of the application we state:

Raíces will submit applications to all available benefactors. City, state or federal as well as church and private foundations for additional funds... .Raíces will participate in USDA child nutrition programs, including the National School Lunch Program (NSLP), and the School Breakfast Program (SBP). Raíces is committed to offering school meals through the NSLP and SBP programs, and other applicable Federal child nutrition programs, that meet or exceed current nutrition requirements established by local, state, and federal agencies, served in clean and pleasant settings; accessible to all students; reimbursable school meals that meet USDA qualifications. Families that wish to or can pay will find that pricing is reasonable.

## II.L.(2) Facility Identification

### ***CSD EVALUATION: Approaches the Criteria***

*The applicant's response identifies several facilities that have been researched within the school's targeted location. Although, several facilities have been identified, not all of them include information on whether a building meets state requirements, occupancy, adequacy and/or ownership. However, the applicant has identified a viable option located at 201 E. Loham. This facility had been a charter school and currently has E-occupancy and meets the requirements.*

*The applicant's response mainly focuses on providing minimal details on the facilities researched but does not include specific action steps and responsible parties for ensuring the school is ready for the opening date. Additionally, the narrative lacks clarity on the the preparation for facilities without Eoccupancy will be funded.*

**Raíces Response:** In our Application, we provided adequate evidence that we researched potential facilities, and, most importantly, we clearly identified at least one appropriate facility in our targeted geographic location. CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The applicant's response does not include specific action steps and responsible parties for ensuring the school is ready for the opening date. The narrative lacks clarity on the preparation for facilities without E-occupancy will be funded.***

Because we are aware of State requirement to obtain E-Occupancy Certification, we stated in the application Section II.L.2 (page 180):

When a charter school is located in a facility that is not classified as an E Occupancy, it must obtain an E Occupancy Certification prior to moving into the space. The school must hire a New Mexico

licensed architect to draw plans of the school indicating that the school meets code requirements for E Occupancy. These plans are then submitted to PSFA for adequacy/code review. Once PSFA has completed their review, the plans are then sent to the Construction Industries Division to obtain an E Occupancy Certificate.

Realistically, with regards to the timeline, this process will take our school at least a year and a half before we are ready to occupy our targeted place at Myrna's Children's Village on campus at NMSU. Because any plan to move forward is contingent on an E-Occupancy approval statement, we listed two other options that are of interest and are viable in a short amount of time (no more than 6 months). The other identified alternative places are described as "potential spaces" with minimal adaptations to obtain E-Occupancy certification in case we need to explore other options. The fact that we didn't explain in detail information for each of the other places is because we have secured an understanding with the owners of a location that has been approved for E-Occupancy and the contract is contingent on the charter approval notice.

The site at 201 E. Lohman that we identified for the first couple of years does not need a big amount of funds to comply with requirements to be adapted for Kindergarten students. This will allow us to dedicate the funds from Raza Development Fund to remodel the NMSU Children's Village site which we intend to be our permanent home.

During our preparation, our Raices Facilities Committee dedicated the time to build a relationship with the founders to be prepared during the implementation year to have an optimal space approved by PSFA based on the expectation of being ready to start on August 2019. In our Application, on page 181, we state the following: "Over the year, the Raices team is building relationships with private donors and foundations as well. Raices founders anticipate financial support in different modalities to start up and sustain costs including facilities and other operational needs to be covered during the planning year."

### **III. FINANCIAL FRAMEWORK**

CSD concluded that this section of our application was "inadequate as only 50% of the responses were rated 'Meets the Criteria', three (3) areas were rated 'Approaches the Criteria', and one (1) area was rated 'Falls Below the Criteria', with a section score of 77%." As explained in more detail herein, this is incorrect. We have responded, in detail, to each area of our application where CSD rated our response as "Approaches the Criteria" and to the section that CSD rated as "Falls Below the Criteria."

### III.B.(4) Budget Adjustments

#### **CSD EVALUATION: Approaches the Criteria**

*The applicant's response describes strategies that may be used to adjust the budget appropriately. For example, if the school does not reach its funding levels it plans to alter the staffing to the actual student enrollment by:*

- *“Removing office support positions and assigning the responsibilities to other staff,*
- *Decreasing the FTE for certain teaching staff and support staff*
- *Exploring opportunities to share responsibilities amongst staff for those positions that are cut or adjusted to part-time status*
- *Cutting non-essential items”*

*Additionally, the applicant notes, “the Finance Committee will review the budget to try and realize some savings on expenses that tie to the number of students, such as teaching staff, instructional support, instructional materials and textbooks.”*

*Although, the applicant details possible strategies to budget shortfalls, the narrative does not clearly explain how these strategies are viable and realistic and based on financial expertise. Additionally, the narrative explains that the applicant has identified other sources of funding to cover ancillary services costs for its special education population but does not identify where those funds are coming from. The applicant states, “We will plan for these expenses through other sources of funding which we have been actively pursuing already and have already received confirmation from several Foundations that they will be supporting Raíces if the charter is approved.” A commitment from NACA was detailed in the narrative for the amount of \$50,000 to be used in start-up costs. It is unclear if this amount is allotted to ancillary services or other costs, as it is not reflected in the budget.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The narrative does not clearly explain how these strategies are viable and realistic and based on financial expertise. It is unclear if the amount of \$50,000 from the NACA Foundation is allotted to ancillary services or other costs, as it is not reflected in the budget.***

We provided adequate details relating to possible strategies to address budget shortfalls in our Application and these strategies are viable and realistic. As we stated at the Capacity Interview and at the Public Hearing, we have been exploring “other sources of funding” and have identified sources that are committed to funding our school once we receive notice that our charter has been approved. Immediately after the approval notice, we will begin negotiations with potential funders and start planning in terms of amounts and allocations for specific budget items. (See Appendix N containing Letters of Support from organizations such as the McCune Foundation and the W.K. Kellogg Foundation)

With regards to the \$50,000 from the NACA Foundation, in Section II.B.(4) (page 195) of our Application, we clearly stated the following: “Raíces has secured a commitment from NACA for \$50,000 to assist with some of the start-up costs. Allocations to specific budget items will be determined by the items that can be covered by other committed foundation funding sources. This funding is not reflected in the budget since it will be used prior to July 1st, 2019.”

During the Public Hearing on July 20, our board members also confirmed the funding commitment from the NACA Foundation to cover the salary of the school principal for the first 3 years of operation.

### III.C.(1) Financial Oversight (Appendix H)

***CSD EVALUATION: Falls Far Below the Criteria.***

*The applicant’s narrative and internal control procedures (Appendix H) are not fully developed and lack details on how the school will effectively:*

- *Safeguard assets*
- *Segregate its payroll*
- *Segregate cash and check disbursement duties*
- *Provide reliable financial information and promote operational efficiency*

*The response minimally addresses how the audit will ensure compliance with state requirements. No additional information is provided to ensure the school is maintaining reliable financial information on its own.*

*Furthermore, the narrative does not address whether its procedures are based on the professional judgment of experienced, licensed, school business officials and does describe a complete process for regularly evaluating compliance with the internal control procedures.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***The applicant’s narrative and internal control procedures (Appendix H) are not fully detailed and lack details. The response minimally addresses how the audit will ensure compliance with state requirements. No additional information is provided to ensure the school is maintaining reliable financial information on its own. The narrative does not address whether its procedures are based on the professional judgement of experienced, licensed, school business officials.***

CSD did not include specifics about the details that it believes are lacking from our internal procedures in Appendix H; however, we believe the information we provided in our narrative and in Appendix H demonstrates our commitment to:

maintain an internal control structure to provide management with reasonable assurance that assets are safeguarded against loss from unauthorized use or disposition, that transactions are executed in accordance with management's authorization, and are recorded properly to permit the preparation of general purpose financial statements in accordance with GAAP, and that state and federal programs are managing in compliance with applicable laws and regulations. Application, *Financial Oversight*, Section III.C.(1).

The internal procedures that we have developed contain adequate details on how we will effectively safeguard assets<sup>3</sup>; segregate cash and check disbursement duties; and provide reliable financial information and promote operational efficiency. However, we do acknowledge that our internal procedures could include use more detailed information relating to the area of segregation of payroll and we remain committed to fixing this with our proposed licensed and experienced business official.

The job descriptions for all staff in Appendix O: Staffing Plan begins by specifying that all staff must be licensed and certified for each job described in Appendix O. This means that the Business Manager who will start out as a half-time contracted service provider instead of a staff member/employee must be a licensed bookkeeper and certified procurement officer.

It has recently come to our attention that the individual we were considering for the business manager position at Raíces is under investigation. To be clear, this individual was never hired by Raíces, nor did she hold any official position with our School. At the time that she assisted us with the development of certain areas of our application, she was an experienced and licensed business official. Certainly, now that we have learned that she has been placed on administrative leave for alleged financial discrepancies, we are no longer considering her for the position and are seeking the advice and counsel of another licensed and experienced business official. Currently, we are in discussions with the Vigil Group LLC as a potential candidate to fill this position.

The Raíces Governing Council acknowledges its own responsibility to maintain sound fiscal policies and procedures. Most importantly, our prompt response in seeking out another business official shows our commitment to ensuring that our fiscal policies and procedures are based on the professional judgment of an experienced and licensed business official. Raíces remains committed to following best practices regarding fiscal policy and to working closely with our proposed business manager.

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<sup>3</sup> **Safe-Keeping Assets:** Access to assets will be limited by assigning a primary guardian for each program area. The guardian, i.e., Teacher or Artist for each program area will be responsible for monitoring the access to such assets. Appendix H: Internal Procedures.



### III.C.(2) Financial Staff

***CSD EVALUATION: Approaches the Criteria***

*The applicant's response adequately describes the responsibilities of the Principal and the Business Manager and align fully with the organizational chart included in this application. However, based on the budget, it is unclear whether the Business Manager is an employee or contracted. The lack of this information implicates whether the applicant has identified the appropriate qualifications for this individual. The budget allows for an Office Manager in the personnel section and for Business Manager Services in the other expenses section of the budget.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- ***Based on the budget, it is unclear whether the Business Manager is an employee or contracted.***

We believe we were clear in our Application regarding the employment status of the Business Manager. See Appendix O: Staffing Plan. The job description for the Business Manager position reflects that this position will become a full-time position by the 5th year. Until then, the position is classified as a half-time contract service provider. Also see Appendix K: The Organizational Chart, where it clearly shows that the Business Manager position clearly is a contractual service. We understand that the business manager needs to be a licensed, certified bookkeeper and procurement officer who is trained in how to comply with state school funding laws and regulations. Also See Appendix G: 5 Year Budget Plan.

### III.C.(3) Governance Board Legal and Fiscal Oversight

***CSD EVALUATION: Approaches the Criteria***

*The applicant's response minimally focuses on the formation of the audit and finance committees. It begins by detailing how the Governance Board will act as a Board of Finance and simply states the board will establish both committees. No additional information is provided to describe how they will be formed or how each committee will ensure proper legal and financial oversight.*

*The response did indicate the make up of each committee, which includes the Principal and Business Manager. A general outline of duties was provided for both committees.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *No additional information is provided to describe how they committees will be formed or how each committee will ensure proper legal and financial oversight.*

In Appendix A: Bylaws, Article 5: COMMITTEES on pages 11 and 12, we describe in detail how the audit and finance committees will be established, who will serve on these committees, and how we will ensure proper legal and financial oversight.

Specifically, in Section 5.2: Standing Committees, we provide the following:

Each standing committee shall have a charge specific to its permitted activities and such charges shall be incorporated into Raíces policies. The function of any committee shall be fact-finding, deliberative, and advisory to the Board. Committees shall not have authority to take legislative or administrative actions, nor to adopt policies for Raíces. Standing committees shall be made up of no more than one less than a quorum of the Board. The Board Chairperson shall be an ex-officio member of each committee. The Principal shall be an ex-officio member of each committee, except where his/her evaluation, tenure, or salary is to be deliberated. The Business Manager shall be an ex-officio member of the Finance and Audit committees. Standing committees shall be:

- Governance Board Development Committee
- Finance Committee
- Audit Committee

Pertinent to the evaluator's critique in this section of the application is the description that follows in this section of the bylaws for the finance and audit committees on page 12 of the bylaws which specifies the membership of each committee and the criteria that will be used as specified in state statutes to ensure compliance with regulations regarding legal and financial oversight. These descriptions read as follows:

b. Finance Committee: The Finance Committee shall be comprised of the School Business Manager, Board Chairperson, Board Treasurer, who shall serve as chair, at least one other member of the Board, a member of the Concilio (Parent Council), and the Principal. The purpose of the Finance Committee shall be to make recommendations to the Board in the following areas: financial planning, including review of the School's revenue and expenditure projections; review of financial statements and periodic monitoring of revenues and expenditures; annual budget preparation; oversight; and procurement. The Finance Committee shall also serve as an external monitoring committee on budget and other financial matters and shall evaluate the Principal's compensation, oversee the use of funds, review and oversee the school's risk management policies and investments, and review and advise the Board on all matters affecting the school's financial condition. In carrying out its duties the Finance Committee must adhere

to regulations of the New Mexico Public School Finance Act (22-8-1 and 22-8-12.3 NMSA 1978)

c. Audit Committee: The Audit Committee shall be comprised of the School Business Manager, Board Treasurer, who shall serve as chair, Principal, the Board Chairperson, one community volunteer who has experience in accounting or financial matters and one parent volunteer from The Concilio. The parent shall be appointed from a list of parents who are willing to volunteer on the Committee. The purpose of the Audit Committee shall be to 1) evaluate the request for proposal for the annual financial audit services, 2) recommend to the Board the selection of the financial auditor, 3) attend the entrance and exit conferences for annual and special audits, 4) meet with external financial auditors at least monthly after the audit field work begins until the conclusion of the audit, 5) be accessible to the external financial auditors as requested to facilitate communication with the Board and the Principal, 6) track and report progress on the status of the most recent audit finding, 7) advise the Board on policy changes needed to address audit findings, and 8) provide other advice and assistance as requested by the Board. The Audit Committee shall be subject to the same requirements regarding the confidentiality of audit information as those imposed upon the Board by the Audit Act (12-6-1 through 12-6-14 NMSA 1978) and rules of the New Mexico State Auditor.

#### IV. EVIDENCE OF SUPPORT

CSD concluded that this section of our application is adequate with a section score of 83%; however, we would like to respond to the one area that CSD rated as “Approaches the Criteria.”

##### IV.D. Innovation

***CSD EVALUATION: Approaches the Criteria***

*Although the applicant provides a clear overview of the qualities and characteristics that make up the school’s educational model and mission, it does not provide a compelling explanation for the demand of this type of model.*

*A section of the narrative focuses on the history of the culture and roots that was the impetus for the development of the model and states, “The uniqueness and innovation of our proposed school is meant to support local public education and its efforts to prepare students to enter a culturally diverse, multilingual, technologically challenging world where “thinking outside the box” is more a necessity than a cliché.” However, no additional information is provided to support how the applicant team knows there is a compelling demand for this educational program within the targeted geographic area.*

**Raíces Response:** CSD inaccurately concluded that the information included in our Application was not adequate for the following reason(s), which we address below:

- *No additional information is provided to support how the applicant team knows there is a compelling demand for this educational program within the targeted geographic area.*

In Section IV.A.(1) of the Application (page 203), concerning Outreach Activities, we described meetings and surveys conducted to learn directly from families of their interest in a school with the curriculum we propose for the Raices School. Besides the social and economic pressures identified by the participants, during the process of exploration and learning from our communities, the Raices Outreach Team collected some sad and painful stories from parents that were experiencing disenfranchisement, self-segregation, and low self-esteem because of the lack of English language skills and misconceptions of how the public systems work (education, health, housing, jobs, and food access).

In our LOI, we provided substantial information on pages 3-5 that indicates a demand for this type of school as follows:

- 76.4% of the elementary children in the Las Cruces Public schools are Hispanic.
- 87% are economically disadvantaged.
- For 29.5% of these students the language spoken in the home is Spanish.
- Of this group of elementary students, 15.9% are ELLs.
- 16.4% have been identified as special education students
- Student achievement results on the PARCC show proficiency levels in ELA and math are quite low for students in the 3rd, 4th, and 5th grades.

Data from Head Start Programs and community workshop sessions document the strong need that parents see for alternative options to the traditional school setting. The Raíces' Team has engaged in a significant number of conversations with parents, potential partners, interested organizations, and community leaders in the development of the projected school, including local indigenous communities (Piro-Manzo, Tortugas and Raramuris), where participants were exposed to examples of the Mesoamerican components of the curriculum and expressed an enthusiastic response.

NMSU is planning to develop an Ethnic Studies Bachelor's and Master's degree program to be offered in the College of Education that would foster a critical, historical, and locally-relevant practice and approach to community engagement. The NMSU College of Education sees our proposed school as an opportunity to contribute to their process for restructuring how teachers are educated to draw on indigenous pedagogy to improve educational outcomes for children. The Raíces' Team has held discussions with NMSU about a partnership with them for implementing a community schools' approach and are continuing discussions with the Dean's office in the College of Education (See letters of support in Appendix N from the Dean and faculty members.)

Since the inception of the workgroup (23 months), the Founding Team Coordinator, has organized 29 information sessions and workshops with over 336 different participants. The Coordinator has conducted many individual interviews with stakeholders and members of other community sectors and institutions including: the Las Cruces City Council, the Doña Ana County Commission, NM State Legislators, the Hispanic Chamber of Commerce, Green Chamber of Commerce, educators, executive team of the local chapter of NEA, members of LCPS School Board, faith based community organizations, Early Childhood Las Cruces Head Start Program Team and Policy Council, La Clinica de Familia Healthy Start Program Director, Healthy Kids Las Cruces Coalition of the NM Department of Health, Las Semillas Food Center, and representatives of the arts and culture sector for a total of 120 key community leaders. Many of these organizations have contributed to the 21 letters of support.

Lastly, we feel it is worth noting that there is only one charter school in Las Cruces that serves Elementary grades, J. Paul Taylor Academy, which always has a long waiting list. As of a month ago their waiting list was 157 students as reported at the PEC Hearing on July 20 by Carrie Hamblen, who is one of the council members at the Academy.

## APPENDIX B

### RAICES' RESPONSE TO CAPACITY INTERVIEW EVALUATION

We have included evaluation notes from the Capacity Interview, *highlighted in gray*, followed by Raíces' responses, in plain text. Our responses contained herein do not provide or add any new information nor do they attempt to remedy any alleged deficiency. Rather, our responses are offered to clarify the responses we have already provided. We believe that the responses we have provide in our Application and at the Capacity Interview, coupled with the clarifying responses in Appendix A: Raíces Response to CSD Final Analysis, demonstrate that we have the capacity to operate an effective, high-quality charter school.

#### **Question 2 – Educational Plan: Innovation**

**Evaluation:** *Although, the applicant team provided numerous elements that are in alignment with its educational plan, the team did not prioritize or differentiate between these elements to identify the most important contribution the proposed school will bring to public education in the target border community. Furthermore, no supportive details were provided to demonstrate how a contribution is essential to the success of the proposed school.*

**Raíces Response:** During the Capacity Interview, we felt we adequately explained that our most important contribution, in alignment with our mission statement, will be an effective research-based approach in early childhood bilingual education known as a 90/10 model. This approach along with the highly engaging Xinachtli curriculum not only promotes brain function but allows each student to be motivated by a positive personal identity as result of being taught to feel pride in one's cultural heritage. We will serve as a model for other public schools and as a partner with the NMSU College of Education in serving as a laboratory for teacher training in a culturally responsive model that produces bilingual and biliterate students, a much-desired skill set by employers not only in NM but the entire country.

#### **Question 3 – Educational Plan: Mission Implementation**

**Evaluation:** *For most of the areas, the team stated the assessment tool that would be used. For example, to measure if a student is growing in the art of dialogue, self-reports would be completed. However, no further details were given by the team to elaborate on how this tool evaluates the effectiveness of its mission and implementation of it. In another example, the applicant team stated that multiple assessments to evaluate academic progress will be used and that time is allotted within the school calendar for teachers to review data, however, no clear plan was provided to demonstrate how the results of those assessments will evaluate whether its mission and implementation of it are working. Lastly, no information was provided by the team on its plan for assessing the areas of critical thinking/dialogue and parent involvement/enthusiasm and how through its evaluation the applicant can determine if its mission and implementation of it are working.*

**Raíces Response:** During the Capacity Interview, we felt we adequately explained that we will know our mission and implementation is working if 80% or more of our students are achieving proficiency in English and Spanish language acquisition as measured by the specified growth

rates which were determined by consultation with experts in the field of assessment of biliteracy. Additionally, we will know we are achieving the implementation of our mission and program if our students are achieving proficiency in subject matter content in mathematics, science and social studies as well. We have enumerated at great length the measurement tools we will use to assess this success in subject matter content in the Academic Framework section of our Application.

#### **Question 4 – Leadership & Governance**

**Evaluation:** *However, no additional information was provided to clearly connect how its process for bringing members on board support the success of the proposed school.*

**Raíces Response:** During the Capacity Interview, we felt we adequately explained that the board supports the success of the school with its careful monthly monitoring of student academic progress in biliteracy and subject matter content. Additionally, the monthly monitoring includes careful attention to the projected budget versus actual expenditures to make sure that the school always has the necessary operating funds to succeed in program delivery. The Governance Board development committee makes sure the board members are up to date monthly on their knowledge and training with respect to monitoring the school’s compliance with state statutes and codes to ensure the school is meeting all state standards. Finally, they pay attention monthly to monitoring the moral of the school as judged by reports from the principal, the Parent Council and the reports on grievances filed by parents on behalf of their children.

This work gets accomplished through the effective functioning and interim work between board meetings of the board established committees or councils/advisory groups: 1) the three standing committees - Governance Board Development, Finance and Audit Committees; 2) Curriculum School Performance, School Development, Facilities, and Community Partnership Committees; and 3) the Parents Council. In summary, the board will support the school success in achieving its mission through the monthly academic, fiduciary and legal compliance monitoring which will be accomplished by the work of the board committees working in partnership with the principal, school staff, the Parent Council and community.

#### **Question 5 – Leadership & Governance**

**Evaluation:** *Although the team described the qualities of a school leader, which align with its mission, it did not provide a full description on the process for identifying and selecting the school leader nor did the response include information on how the process supports the success of the proposed school.*

**Raíces Response:** We address this fully in the response given in [Appendix A: Raíces Response to CSD Final Analysis](#) on page 20.

#### **Question 6 – Leadership & Governance**

**Evaluation:** *While the applicant team has minimally described the two parts that make up the evaluation, it has not clearly thought through its strategic process for conducting these*

*evaluations. Specifically, there is no detail on what information is collected to address the questions provided by the applicant team. Furthermore, the team did not describe how those processes support the success of the proposed school.*

**Raíces Response:** We address this fully in the response given in Appendix A: Raíces Response to CSD Final Analysis on pages 16-17.

### **Question 7 – Leadership & Governance**

**Evaluation:** *It was not clear whether it has been discussed previously with all founding members, as no additional detail was provided as to how the coaching would take place. In addition, the applicant team’s response did not clearly indicate how the founders and/or governing body will work with the principal, teachers and staff to ensure the applicant’s initiatives are succeeding. Furthermore, no clear description was provided to show how those relationships evolve to ensure the success of the charter school.*

**Raíces Response:** During the Capacity Interview, we felt we answered this question by furthering elaborating on what is already in our Application. As we explained at the Capacity Interview and in our Application, five of the founders will serve as 5 of the 7 board members on the first Raíces Governance Board to provide continuity during the transition from the planning year to the first year of school operation. In addition, we have described how this board (with a good representation of founders) will work during the planning year to educate the principal about the staff that will be needed as described in the charter. We have said fully reviewing the charter and being guided by the charter plans is a requirement of the principal as part of the contract agreement. In addition, in our Application we stress that the principal must demonstrate an educational philosophy that is aligned with the school mission and goals. It will be the board’s responsibility to ensure that has been fully demonstrated by the candidate that is chosen for the principal position during the interview and vetting process.

Further in our Application, we stated that the board evaluation process will include hiring an external evaluator. This evaluator will assess and coach the board on Board functions and additional training needed to achieve best practices in working effectively with school staff, parents, and the community in achieving the school mission.

### **Question 8 – Leadership & Governance**

**Evaluation:** *It is not clear from the applicant’s response how it will monitor when changes are needed to the bylaws. The applicant team’s response defines how by-laws and policies work in general but does not demonstrate a fully detailed strategic process the proposed school will use to establish and implement its by-laws and policies. Furthermore, the response does not address how those processes will contribute to the success of the proposed school.*

**Raíces Response:** During the Capacity Interview, we felt we adequately described that we recognize that the bylaws represent the key structure for how our Board will operate. We have specified in our Application that all board members must be fully versed on the bylaws and the



bylaws will be part of the content of the Board Hand Book we will construct during the planning year. This was also outlined as part of the orientation process for “onboarding” of new board members. It is part of the job of the Board Chair to make sure that at all times the Board is abiding by the bylaws and that all school policies that are developed are not in conflict with the bylaws. This is extremely important for the sake of the Board being in legal compliance with state statutes and codes that are written into the bylaws as guidelines for board operation and policy development.

### **Question 9 - Leadership & Governance**

**Evaluation:** *However, no additional details are provided to describe how the proposed school will ensure the policies and procedures are well-implemented, current and effective. As it relates to how the applicant team will determine and react when a change is needed, it indicated that if there is a dysfunction, it will use the core values to determine if the change should take place. The role of the school leader will be important in this step. It was not clear from the applicant’s response how the determination will be made or how the core values will be used to make the determination and what role the school leader has in that process.*

**Raíces Response:** The monthly feedback and input from the Principal, Parents Council and Board Committees as well as data from the grievance process reports will help the board assess whether the policies and procedures are being implemented and effective in moving the school toward the accomplishment of the mission. The Governance Board Development Committee is charged with making sure that all board members are fully trained and updated as to the legal compliance with state regulations. It the responsibility of the Board as a body of the whole to make sure that they monitor compliance with state regulations which has been stressed in the application. Problems with parent and student satisfaction and lack of progress in achieving the mission and academic goals of the school will signal the need for policy change on the part of the Board.

### **Question 12 – Finance**

**Evaluation:** *The applicant team described their partnership with the NACA school network and indicated they have access to a grant through the foundation. As the grant does not have any restriction on timelines, the applicant team knows it can use the funds for curriculum materials and technology. Additionally, the team noted a possibility of funds through the McCune and Kellogg grants. The Business manager consultant that was part of the applicant team affirmed the proposed school’s plan to acquire funding to include setting up a bank account, acquiring furniture, having software systems in place to interface with PED’s OBMS system. Although, the applicant team cited several organizations that would potentially provide funding, it did not clearly detail what progress has been made to acquire those funds or what amounts these grants may provide to ensure the proposed school has a plan for supplementing the budget.*

**Raíces Response:** We address this fully in the response given in [Appendix A: Raíces Response to CSD Final Analysis](#) on page 30-31.

#### **Question 14 - \*Finance**

**Evaluation:** *The applicant team minimally stated that it would reduce FTEs to appropriate levels if the numbers are lower. No additional information was provided to describe the implications on the budget/business plan or what the next steps would be. Furthermore, no detailed actions and timeframes were described to address these situations.*

**Raíces Response:** First, we believe that it is highly unlikely that we would fall so far short on enrollments based on parent interest expressed in the numerous workshops and information sessions conducted thus far on the school and the commitment of such groups as Head Start Programs, Myrna's Children's Village, and other early childhood programs to assist us with recruitment. However, if we did fall so drastically short of enrollment, in addition to cutting staff, materials, and doubling up on job responsibilities on the part of the principal, we will build in such contingencies into the budgets requests from the W. K. Kellogg and McCune Foundations during the planning year.

#### **Question 16 - \*School-Specific: Mission specific goals, rigorous and attainable**

**Evaluation:** *The applicant team's response generally described that research had been conducted on how to evaluate the progress of students in bilingual education. Additionally, as it pertains to the rigor of the proposed school's goal, the team stated that if students are able to "grow", bi-literacy is rigorous in and of itself. The team's response did not conclusively state how the specified goal is rigorous for its target population, what specific resources led to that conclusion, and what supports the team's expectations.*

**Raíces Response:** We address this fully in the response given in Appendix A: Raíces Response to CSD Final Analysis on pages 1-2.

#### **Question 17 - \*School-Specific: Special Education program/services; measures and metrics to be used**

**Evaluation:** *The team did not address what the specific roles and responsibilities the school administrator will have in supporting the needs of the student and teachers. It was not made clear that specific supports would be provided for students with disabilities outside of the 90:10 model. Although the team stated that data would be gathered, it did not specify what information is collected through observations. Finally, no information was provided to explain how the proposed school will evaluate the effectiveness of the special education program.*

**Raíces Response:** This is addressed fully in Appendix A: Raíces Response to CSD Final Analysis on pages 21-22 in the job description of the principal under **Domain I: Instructional Leadership**. Regarding the principal's role for supporting special education students and programs that is addressed on page 9 of the Appendix A: Raíces Response to CSD Final Analysis.

**Question 18 – School-Specific: Assessments to inform instruction**

**Evaluation:** *The applicant team began by describing the multiple assessments that make up its assessment plan and indicated each assessment will be reviewed to analyze the proposed school’s main goals. The team discussed the planning time allotted for teachers during the school year. However, no additional information was provided to demonstrate a clear framework for how data from these multiple assessments drive instruction.*

**Raíces Response:** The application describes how the principal who heads up the curriculum and instruction team as shown in the organizational chart in [Appendix K](#) will meet with the staff every week for a full half day work session on developing strategies for classroom instruction based on assessment outcomes and individual student needs. (See [Appendix I: School Year Calendar](#) of our Application) The schedule for the availability of the outcomes of these assessments will drive the framework for which curricular areas will be addressed from one week to the next as well as reports from the Special Education teacher on progress on individual IEPs whether it be children identified as gifted or children with disabilities.

**Question 19 – School-Specific: Steps to recruit accounting and legal expertise for the board**

**Evaluation:** *The applicant’s response did not identify the steps that will take place to identify viable candidates with accounting and legal expertise through the networks and firms.*

**Raíces Response:** During the Capacity Interview, we felt we adequately explained that we currently have a board member with considerable accounting expertise. Although not a CPA, he is fully capable of working with the contract services for business management. We are in discussion with the Vigil Group LLC to contract the work that is assigned to the business manager. This is a well-respected business management firm that is based in Albuquerque but provides services beyond the area. We are in the process of conducting discussions with a local law firm and a retired CPA to assist us in recruiting both legal and accounting expertise as we add the next two Board Members for a full complement of 9 members, the maximum as permitted by our bylaws.

**Question 20 – School-Specific: Costs of professional development and mentorship; where in budget**

**Evaluation:** *The applicant team describes that it has budgeted \$500 per teacher for stipends to pay teachers for their time to attend professional development trainings. Additionally, many professional developments will be conducted through in-kind contributions. These costs were covered in budget. The applicant team did not address the cost for the mentorship plan.*

**Raíces Response:** We have noted in [Appendix A: Raíces Response to CSD Final Analysis](#) on page 24, that we have built \$500 dollars into the budget for professional development of each teacher. We are also building \$4,000 into a grant budget for an intensive teacher training workshop by Dual Language Education New Mexico on the 90:10 Model prior to the opening of school. Both the Principal and the Culture and Curriculum Coach have responsibilities for mentoring teachers which is part of their paid job positions.

**Question 21 – School-Specific: Parental concerns in initial phase (before formal grievance)**

**Evaluation:** *It is unclear from the applicant's response how and why a parent would have to go through the parent council before speaking with the principal for a concern.*

**Raíces Response:** As we described our Application, there is a process described in the for parents to address their concerns for their child's education for which we received the full number of points from the evaluators in Section II.F.(2), the grievance process. It begins with three steps that are to take place before a formal grievance report is filled out to be submitted to the Board. First the parent is asked to talk over the concerns with the teacher. If they feel that the student needs are not meet, they are asked to speak with the Parent Council. We acknowledge that some parents may not be comfortable doing this or even may not have the time to address the need in a meeting of the parent's council. If this is the case the parent can go directly to the principal.

However, in a community school there is a good reason to at least register the concern with the Parents Council, even if done anonymously. The reason being that this is the group that assists in developing policy to meet the needs of children and parents and provides education for parents as to how to advocate in a positive way for their child's needs in an education system. Parents are great teachers in helping each other and can often be less intimidating than people that they see as authority figures, a perception based on their own experiences in public schools. Of course, the principal and teachers need to actively create an open environment for discussion, but for some parents this will take time to build their trust.

**Question 23 – School-Specific: Business Manager as employee or contractor and qualifications**

**Evaluation:** *The applicant team states that for the first few years the business manager will be contracted until the proposed school has sufficient budget to employ a manager. No additional detail was provided on whether the qualifications change for a contractor.*

**Raíces Response:** This has been addressed in [Appendix A: Raíces Response to CSD Final Analysis](#) on page 35 and we believe we addressed this adequately at the Capacity Interview. To be clear, we have stated that the business manager will be a part time contracted service up until the 5th year of operation. However, the same qualifications apply that the person providing these services must be a licensed, certified bookkeeper and procurement agent.