



402 W. Court Ave.
Las Cruces, NM 88005
Telephone: 575-541-0145
Fax: 575-527-5329
hschullo@almadarte.org

March 31, 2019

State of New Mexico
Public Education Commission

Dear Madame Chair Gipson,

This letter is in response to the *Notice of Concern* received via email on Thursday March 21st. Attached are the responses to corrective action plans for Special Education and English Language Learners.

The attached revisions address previous recommendations from the Charter Schools Division staff noted January 3 and 31, 2019.

We appreciate your continued guidance and leadership in bringing Alma d' arte back into "Good Standing." As you are aware, we have been in "crisis" mode since I discovered the financial corruption and academic misguidance of the previous administrators.

We have addressed the financial needs which were #3 in the CAPs. Responses address #1 Special Education and #2 English Language Learners. We are also addressing all aspects of the school in preparation for the April 8th Charter Schools Division site visit.

My personal goal is to bring back the excellence in academics, community involvement, arts integration, and leadership that Alma d' arte was known for.

Again, thank you for your wisdom, patience, and advice.

Respectfully,

Is Holly A. Schullo

Holly A. Schullo
Chief Academic Officer/Principal, Alma d' Arte

Cc: Gene Elliott, Governing Board President
Alan Brauer, Director, Charter Schools Division



402 W. Court Ave.
 Las Cruces, NM 88005
 Telephone: 575-541-0145
 Fax: 575-527-5329
hschullo@almadarte.org

March 31, 2019

Alma d' arte Charter High School

Response to March 21, 2019, Notice of Concern for Noncompliance from Patricia Gibson, Chair of Public Education Department

#1 Special Education CAP Response

LEA: Alma d'arte Charter

Item A

| Concerns with PEC CAP | |
|--|--|
| CAP Item | Action Taken |
| <p>Item A., Action Step 1: Ensure that all incoming IEPs for transfer students are monitored</p> | <p>Action Step 1: Involves two students. Student A withdrew from Alma to Mayfield High School in November. Student B transferred from Indiana and IEP records are complete.</p> <ul style="list-style-type: none"> • Alma hired a new Special Education Coordinator/Teacher in October and she reviewed and updated all IEPs so that they are in continuous compliance. • Alma continues to monitor IEPs as annual and re-evaluation dates becomes due. <p>Responsible Personnel: Principal, Special Education Coordinator</p> <p>Timeline: Continuous</p> |

| | |
|--|---|
| | <ul style="list-style-type: none"> ● Student A: November 2018 ● Student B: January 2019 ● Hired Special Education Coordinator Teacher October 2018 |
| <p>Item A: Established Procedures for Monitoring IEPs and re-evaluations to “ensure” continuous compliance</p> | <p>Alma Monitors IEPs Processes Weekly:</p> <ul style="list-style-type: none"> ● Monitor active IEP referral cases ● Share information of students that transfer into system with appropriate academic and support services personnel ● Manage IEP accommodations ● Manage referral processes for special education, assessment, and reevaluation and document <p>Further:</p> <ul style="list-style-type: none"> ● All Teachers receive accommodations for each student ● SPED teacher reviews implementation, goals, and objectives of IEPs ● Calendar and TIENET used to monitor REED and Annual Evaluations dates <p>Personnel Responsible: Principal and Special Education Coordinator/ Teacher</p> <p>Timeline: Continuous</p> |
| <p>Item A: IEPs must be Individualized to meet the needs of the student including the services the student needs (group, individual, inclusion, or segregated, special education math, English, etc.).</p> | <p>Every IEP has been reviewed for individualization of services and least restrictive environment. IEP meeting have been held to individualize services:</p> <ul style="list-style-type: none"> ● Reviewed all IEPs ● Assessed all Special Education students for present level of performance to identify individual needs |

| | |
|--|---|
| | <ul style="list-style-type: none"> ● Conducted new IEPs for all Special Education students ● Created a wider spectrum of services to meet individual needs, Math, and ELA inclusion and push-in support ● Hired external reviewer to review all IEPs for compliance (April) and conduct on-site PD (May) <p>Personnel Responsible: Principal and Special Education Coordinator/Teacher, IEP Team</p> <p>Timeline: Continuous</p> |
|--|---|

Item B

| CAP Item | Action Taken |
|---|---|
| Item B., Action Step 2 and 3 Model described does not meet the needs of each individual student as indicated in each student’s IEP | <p>Alma is providing individualized services through self-contained Math and English classes taught by Highly Qualified Special Education Teachers. These teachers also push in to support students in regular education classes in a co-teaching model. Strategies are shared with teachers.</p> <p>All IEPs have been reviewed for goals and objectives, least restrictive environment, and for type of service:</p> <ul style="list-style-type: none"> ● Least restrictive environment (LRE) will be monitored so that individual students needs will be met ● Services to students are provided |

| | |
|---|--|
| | <p>based on least restrictive environment</p> <ul style="list-style-type: none"> ● We developed new goals and objectives in new IEPs based on student needs and LRE <p>New support classes created for content mastery, and separate courses for Math and English:</p> <ul style="list-style-type: none"> ● Highly Qualified English/Sped teacher supports English courses and co-teach – monitor weekly grades, progress reports, observation, and ZAP tutoring ● Teacher has Master in Special Education, awarded December 2018, and will take special education skills test, get endorsement, and certified license <p>Timeline: Continuous</p> <p>Personnel Responsible: Principal, Special Education Teachers, Special Education Coordinator/Teacher, IEP Team</p> |
| <p>Item B., Action Step 2 and 3: Track services provided and monitor progress</p> | <p>The Learning Lab model was replaced with self-contained classes and inclusion in English and Math. Services are tracked in classes, by grades in PowerSchool, benchmark tests, and observations.</p> <p>Alma is reviewing and adopting research based tools for short cycle assessments (using Edulastic currently), assessing, monitoring students’ needs (Brigance, PLATO, NWEA MAP, Step Up For Writing)</p> |

| | |
|--|--|
| | <p>and additional supports to existing tools.</p> <p>Personnel Responsible: Principal, Special Education Teachers, Special Education Coordinator/Teacher</p> <p>Timeline: Continuous; Using materials from platforms for full implementation next year depending on the NMSBA results.</p> |
|--|--|

Additional Concerns

| CAP Item | Action Taken |
|---|---|
| No Approved Idea B Application as of 12/16/18 | <p>IDEA-B Application was reviewed and submitted to Charlene Marcotte, Special Education Division, and has been approved by Governance Council at March 18th meeting.</p> <p>Personnel Responsible: Principal, Business Manager, and GC</p> <p>Timeline: Approved at March 18th meeting and will send minutes to CSB for final approval</p> |
| 2018-19 40-Day Stars Data Not Validated | <p>STARS data has been inputted correctly; Alma is up to date and validated for 40 and 80-day counts. 120 was just submitted. We are updated for all reporting periods.</p> <p>Further:</p> <ul style="list-style-type: none"> ● Caseloads are assigned and all goals, objectives, and service hours LRE are in the STARS |

| | |
|---|--|
| | <ul style="list-style-type: none"> ● Compensatory services have been identified ● Tuesday and Thursday 4 p.m. to 6 p.m. with Special Education Teacher/Coordinator ● Documenting attendance <p>Personnel Responsible: Principal, STARS Coordinator</p> <p>Timeline: 40, 80, 120 days deadlines</p> |
| <p>State Complaint C1819-10 Failure to Develop and implement IEP; Absence of Special Education Teacher; Preventing student from making progress due to not holding IEP to determine needs</p> | <p>This complaint affects one student who since transferred from Alma to Mayfield in November 2018. IEP was to be mediated by state but student was withdrawn November 30, 2018, by parent before mediated IEP meeting. We facilitated retention of credits earned at Alma through facilitation of all courses and final exams.</p> <p>Absence of Special Education Teacher led to lapse in service:</p> <ul style="list-style-type: none"> ● Previous Special Education Coordinator resigned in September after being placed on administrative leave in September, following late August audit of special education files ● Certified Special Education Teacher/Coordinator who conducted internal audit was hired in October <p>Progress of Students:</p> <ul style="list-style-type: none"> ● All IEPs reviewed and students' individualized needs, accommodations |

| | |
|--|---|
| | <p>and modifications, and appropriate educational services have been determined for the least restrictive environment in order to develop student progress</p> <ul style="list-style-type: none"> ● All IEPs have been held and Alma is in compliance. All new IEPs address individualized student needs. ● Compensatory services are being served after discussing with Team to determine individualized services. <p>Personnel Responsible: Registrar (registration), Principal, Special Education Coordinator/Teacher</p> <p>Timeline: Continuous monitoring of student progress. Training on IEPs and Transfer IEPs completed by May 23, 2019</p> |
| <p>Case Management Indicated as Special Education and/or Related Service</p> | <p>As IEPs are/were conducted, Alma removed case management minutes from all IEPs:</p> <ul style="list-style-type: none"> ● Special education and related service(s) are only direct services provided to the student not case management minutes <p>Timeline: October 2018 to present and Continuous</p> <p>Personnel: Principal, Special Education Coordinator/Teachers, Teachers</p> |
| <p>IEP requirements for Transfer IEPs not Being Met</p> | <ul style="list-style-type: none"> ● Monitor active referral cases |

| | |
|---|---|
| | <ul style="list-style-type: none"> ● Share information of students that transfer into system ● Manage IEP accommodations ● Manage referral processes for special education, assessment, reevaluation, and monitoring <p>Person Responsible: Principal, Special Education Coordinator/Teacher, and Registrar</p> <p>Timeline: Continuous</p> |
| <p>Study Skills course versus Specialized Instruction</p> | <p>Alma replaced previous Study Skills with content area classes for LRE; self-contained and inclusion support is provided in order to meet the needs (goals and objectives) indicated in IEPs:</p> <ul style="list-style-type: none"> ● Students are served and supported in Content Area of need by Highly Qualified (HQ) Math/SPED teacher and HQ ELA SPED teacher. ● Highly Qualified ELA teacher with a Masters in Special Education (awarded 12/2018) teaches ELA and certify in Special Education. ● Compensatory services are taught Tuesday and Thursday, 4 p.m. until 6 p.m., by Highly Qualified special education teacher. |

| | |
|--|--|
| | <p>Personnel Responsible: Principal, Special Education Coordinator/Teacher, and IEP TEAM</p> <p>Timeline: Continuous</p> |
|--|--|

#2. Serving English Language Learners

LEA: Alma d’arte Charter

Alma is following State Requirements as Outlined Below

| CAP Item | Action Taken |
|---|--|
| <p>A. Language Usage Survey: Identify English Language Learners</p> | <p>Per recommendation of the Language and Culture bureau, Alma removed LUS from our Registration Packet.</p> <p>Alma conducted a thorough review of Registration/Cumulative Files, Special Education files/all IEPs, and STARS data and identified 14 potential ELL students. Of the 14 ELL students, 2 students had no LUS and no STARS data.</p> <p>Audited Cumulative and Special Education files, STARS, and contacted previous schools/districts to identify ELs:</p> <ul style="list-style-type: none"> ● We Identified 14 potential ELs in the STARS Report and Identified students for ACCESS test <p>Alma contacts previous school/district for LUS once at registration. For students whose matriculating schools do not provide LUS, Alma reviews student in STARS for the</p> |

| | |
|---|--|
| | <p>document(s) needed (LUS, possible English proficiency screening assessment results, possible ACCESS for ELL results).</p> <p>We are up to date with all EL potential identifications.</p> <p>Personnel Responsible: Principal, Registrar, STARS Data Coordinator, TESOL and TESOL/SPED Endorsed Teachers</p> <p>Timeline: Ongoing</p> |
| <p>B. English Language Proficiency Screening Assessment</p> | <p>Per Compliance Review of STARS—Alma identified 14 students to administer Wida ACCESS test to 14 students.</p> <ul style="list-style-type: none">● Per responses to question 1-6 and/or a language other than English on the LUS, Alma students are given the ACCESS Test online.● The WIDA Screener will be given once, initially, to students whose LUS has one or more 'yes' responses to questions 1 to 6 and/or a language other than English noted in question 7 (potential ELs).● WIDA Access Test was administered March 5-8 to 14 EL potential learners.● When Alma receives scores from WIDA, we will compare to STARS report and make service adjustments as needed. |

| | |
|---|---|
| | <ul style="list-style-type: none"> ● Alma annually administers WIDA Screener ACCESS for students who have not yet tested out of EL service (4.5 composite) until proficient (a score of 5 on all areas of instrument). ● For students who are identified with severe cognitive disabilities the NMAPA or Alternate ACCESS Test for ELs will be administered annually until proficient. <p>Person Responsible: Principal, SPED Coordinator (TESOL Endorsed), DTC, Registrar</p> <p>Timeline: Annually and Ongoing Monitoring</p> |
| <p>C. Screening and Assessment: Parent Notification</p> | <ul style="list-style-type: none"> ● Upon receiving results of the WIDA ACCESS administered March 5-8, 2019, parents will receive a notification letter of English learners upon <u>initial identification</u> (6.29.5.11 NMAC and Title I) and annually thereafter for continuation of service (Title I requirement). ● Alma keeps the LUS, WIDA Screener Online results, and parent notification letter in the students' cumulative files. <p>Person Responsible: Principal, SPED Coordinator (TESOL Endorsed), DTC, Registrar, TESOL Endorsed Educator Assists with Monitoring, Notifications, and Testing</p> |

| | |
|--|--|
| | <p>Timeline: Ongoing (Upon initial Identification AND Annually as Title I requires notification normally within 30 days of start of school year)</p> |
| <p>D. English Learner (EL) Programs; Linguistic and Cultural Support for EL Learners</p> | <p>Alma is supporting EL potential students until students are proficient and can participate meaningfully in the standard instructional program.</p> <p>Attaining Proficiency:</p> <ul style="list-style-type: none"> ● Alma offers ELD self-contained courses for Math and ELA using SIOP and language supports for students not yet nearing proficient ● EL students develop the English Language in integrated ELA-ELD classes co-taught by a TESOL/HQ-ELA endorsed and ELA/Spanish Bilingual/ESL tutor teacher. ELA teacher pushes in to support other ELA teachers for ELD. ● EL students also develop the English Language in integrated Math-ELD classes, co-taught by a Spanish Bilingual TESOL/HQ-Math endorsed and Spanish Bilingual Math teacher. Math teacher pushes in to support other Math teachers for ELD. ● Program includes Maintenance Bilingual Spanish (Edgenuity); and a focus on academic language development and writing skills (Step Up to Writing Program). Alma uses Edulastic and previews NWEA MAP testing for |

benchmarking language and academic skills development.

- Zeros Aren't Possible and Intensive tutoring
- Identified students are assigned to a Spanish Bilingual Teacher (8 faculty) and/or TESOL/Bilingual Endorsed Teacher (5 faculty) teacher. We have TESOL endorsed for ELA, History, Math, and SPED (Science teacher is bilingual but not TESOL endorsed) and offer monolingual support.

All Alma teachers were trained in SIOP (2017-2018) and updated EL Strategies Training with new and continuing Faculty.

- Strategies Shared to Support language acquisition in the content areas through academic vocabulary development (word walls), scaffolded instruction, building on prior knowledge, and using specific sensory and graphic supports (i.e. foldable, graphic organizers).
- Reading Strategies for PD: Teach Before Reading Strategies (previewing headings, captions, etc.; looking at pictures; making predictions), During Reading Strategies (questioning, visualizing, paraphrasing, re-reading, complete outlines, etc.), and After Reading Strategies (summarize, answer questions, confirm predictions).

Exiting ELs:

ACCESS for ELLs is given annually to all EL

| | |
|--|--|
| | <p>students only until the student reaches proficiency (composite of 5 or higher):</p> <ul style="list-style-type: none"> ● Student exits EL program ● Alma continues to monitor and support most recent EL exits for two academic years <p>Identifying Staff:</p> <ul style="list-style-type: none"> ● Alma has 8 Spanish/Bilingual faculty members, 1 Spanish/Bilingual Registrar, 1 Spanish/Bilingual Secretary, 1 Spanish/Bilingual Custodian, and 5 TESOL/Spanish/ Bilingual endorsed faculty, whereby, most received SIOF training <p>Personnel Responsible: Principal, STARS Coordinator, Special Education and TESOL Endorsed EL Coordinators</p> <p>Timeline: Ongoing Monitoring as Evidenced in CUM file progress notes</p> |
| <p>E. Monitoring and Data Analysis</p> | <p>Reviewed Policy Manual for monitoring students</p> <p>Alma is committed to data-driven instruction and assessment and is previewing data-driven platforms, especially NWEA MAP (for Spanish speakers), Step Up to Writing, and other platforms for short cycle assessments. Currently, we are using Edulastic (PARCC aligned) until we understand the new NMSBA state summative assessment.</p> |

Alma conducted a thorough review of all files (CUM, STARS, and Special Education) and identified 14 potential ELs and have created a list of those to monitor for domain specific growth and Exit.

- We checked EL's CUM Folders for language levels for services needed, and for no longer needs services results, to find English fluency scores.
- We Double-check STARS Data / IEP Data to ensure identification and services provided.
- We monitor grades of these students in PowerSchool and advisory.
- We are monitoring students for two (2) years after EXIT with score of 5 or higher, through ZAP, progress reports, and grades in PowerSchool.
- Domain Specific (reading, writing, listening, and speaking) ACCESS Test scores are shared with ELL's teachers yearly/ongoing with comparable prior years' scores to create goals and monitor growth.

Personnel Responsible: Principal, TESOL Endorsed ELL Coordinator, Special Education Coordinator/Teacher, ELL Teachers

| | |
|--|--|
| | <p>Timeline: Ongoing; Alma provides teachers data for ELLs at the 40, 80, and 120 day reports</p> |
| <p>F. Advance EL with enrichment and advanced curricular opportunities</p> | <p>Alma is implementing ENGaging LATino Communities for Education (ENLACE) Program in U.S. History class for college and career readiness enrichment.</p> <p>Alma offers advanced learning opportunities through AP/Dual Enrollment.</p> <p>Alma pursue avenues to test students in home language for language levels for advanced classes/AP Classes (i.e., Avant) and bilingual seal.</p> <p>Alma d' arte is researching academic recognition for bilingualism (APS considers students who have taken and passed 4 foreign language classes with a 'C' or better eligible for Bilingual Seal on diploma upon graduation).</p> <ul style="list-style-type: none"> ● Students are offered Spanish for Maintenance Bilingual |



STATE OF NEW MEXICO
PUBLIC EDUCATION COMMISSION
300 DON GASPAR
SANTA FE, NEW MEXICO 87501-2786
Telephone (505) 827-6661
www.ped.state.nm.us

PATRICIA GIPSON
PUBLIC EDUCATION COMMISSION CHAIR

KAREN TRUJILLO, PH.D.
SECRETARY-DESIGNATE

Patricia Gipson, Chair
District 7, Las Cruces

Trish Ruiz, Vice-Chair
District 9, Hobbs

Karyl Ann Armbruster, Secretary
District 4, Los Alamos

R. Carlos Caballero, Member
District 1, Albuquerque

David L. Robbins, Member
District, 2, Albuquerque

Glenna Voigt, Member
District 3, Albuquerque

Georgina Davis, Member
District 5, Gallup, Farmington

Michael Chavez, Member
District 6, Socorro

Sonia Raftery, Member
District 8, Roswell

Tim Crone, Member
District 10, Espanola

March 21, 2019

Holly Schullo
Chief Administrator Officer
Alma d'Arte Charter School
402 W. Court Ave
Las Cruces, NM 88005

NOTICE OF CONCERN for NON COMPLIANCE

Sent via Email (hschullo@almadarte.org) and US Mail

Dear Dr. Schullo;

On January 2, 2019 you provided to the Public Education Commission a Corrective Action Plan (CAP) to address financial concerns, deficiencies in identifying, assessing and monitoring English Language Learners, and servicing student with special needs. This CAP was requested as part of the renewal process. You were provided with feedback on the CAP prior to the January PEC meeting. The feedback included comments from the Charter School Division, the Special Educational Bureau, and the Dual Language Division within PED. At the February 8, 2019 PEC meeting the commissioners noted ongoing concerns with Alma d'Arte's inability to adequately address both the deficiencies in identifying, assessing and monitoring English Language Learners, and servicing student with special needs. The CAP lacked specificity, and the final CAP was not submitted to the PEC for the February 2019 meeting. The Commission determined that Alma d'Arte is not in compliance with the terms of its charter contract and duties.

This letter serves as a Notice of Concern under your charter contract, specifically the Intervention Ladder. As part of issuing a Notice of Concern,

the PEC has expected outcomes and deadlines that must be met by the school. The PEC expects Alma d'Arte to respond within 10 days of the date of this letter with the following specific dates and details to address Special Education program deficiencies and English Language Learners program deficiencies. Please provide detailed written description and implementation timelines to implement the Special Education and English Language Learners CAPs

Upon remedying the concern and complying with the expectations established by the PEC, Alma d'Arte may return to ***Good Standing***. If the PEC's expectations and deadlines are not met, the school progresses to the next level of the intervention ladder, which is Notice of Breach.

If you have any questions, please feel free to contact me.

Sincerely,

s/ Patricia Gipson

Chair, Public Education Commission

Cc: Gene Elliot, Governing Board Chair
Alan Brauer, Director, Charter School Division