

## Peer Review Team Report: Sun Mountain Community School

A.(1)	Mission	Does not meet
A.(2)	Vision	Meets
A.(3)	Uniqueness and Innovation	Does not meet
B	Mission Specific Goals	Does not meet
C.	Curriculum, Educational Program, Student Performance Standards	Does not meet
D(1)	Bilingual Multicultural Education, Indian Education, Hispanic Education and Black Education	Approaches
D(2)	Equity Plan	Approaches
E.	Graduation Requirements	N/A
F.(1)	Instruction Philosophy	Approaches
F.(2)	Yearly Calendar and Daily Schedule	Does not meet
F.(3)	Schedule Narrative	Does not meet
G.(1a)	Special Education: Students with IEPs	Does not meet
G.(1b)	Special Education: Progress Monitoring	Approaches
G.(2a)	English Learners: Curriculum & Instruction	Does not meet
G.(2b)	English Learner: Progress Monitoring	Does not meet
G.(3)	ESSA and Special Population Needs	Does not meet
H.(1)	Assessment Plan	Does not meet
H.(2)	Assessment Data Analysis	Does not meet
H.(3)	Achievement Communication Plan	Does not meet
A.(1)	Governance Structure	Approaches
A.(2)	Governing Board Qualifications	Approaches
A.(3)	Governing Board Recruitment	Approaches
B.(1)	Annual Board Training Plan	Approaches
B.(2)	Annual Board Self-Evaluation	Meets
C.(1)	Board Oversight Monitoring Plan	Does not meet
C.(2)	Hiring Head Administrator	Approaches
C.(3)	Governing Board Roles & Responsibilities	Approaches
C.(4)	Annual Head Evaluation	Approaches

D.(1)	Organizational Chart and Narrative	Meets
D.(2)	Job Descriptions	Meets
D.(3)	Staffing Plan	Does not meet
D.(4)	Professional Development Plan	Approaches
E.	Conditions of Employment	Approaches
F.(1)	Meaningful Community Involvement in Governance	Meets
F.(2)	Complaint Process	Approaches
G.(1)	Student Outreach & Recruitment	Approaches
G.(2)	Lottery Process	Approaches
G.(3)	Conflict of Interest Policy	Approaches
I.(1)	Third Party Relationship	N/A
J.(1)	Transportation	Approaches
J.(2)	Food Services	Approaches
K.(1)	Facilities Master Plan	Meets
K.(2)	Evidence of Researched Facility	Approaches
A.	Projected Enrollment	Meets
Appendix F.	910B5	Does not meet
Appendix G.	5 Year Budget Plan	Does not meet
B.(3)	Budget Narrative	Does not meet
B.(4)	Budget Adjustments	Does not meet
C.(1)	Internal Control Procedures	Does not meet
C.(2)	Appropriate Financial Staff	Approaches
C.(3)	Governing Board Fiduciary Oversight	Approaches
A.	Outreach Activities	Meets
B.	Community Support	Does not meet
C.	Community Relationships	Meets

### Evaluation Rubric for Part C: Application

<p><b>Meets the Criteria</b></p>	<ul style="list-style-type: none"> <li>● All required elements present</li> <li>● Sufficient detail present, enabling the proposal to be implemented without requiring further proposal development</li> <li>● The proposal is reasonable and realistic</li> <li>● Fully consistent with other sections, including budget and mission</li> <li>● Fully consistent with all requirements of law</li> <li>● Coherent and easily understood</li> </ul>
<p><b>Approaches the Criteria</b></p>	<ul style="list-style-type: none"> <li>● The majority of required elements are present, but not all</li> <li>● Insufficient detail; further proposal development will be required before the applicant can begin to implement the concept</li> <li>● Minor inconsistencies with other sections of the application</li> <li>● May raise questions about legal compliance, but does not demonstrate non-compliance</li> <li>● May raise questions about reasonableness or viability of the proposal</li> </ul>
<p><b>Does Not Meet the Criteria</b></p>	<ul style="list-style-type: none"> <li>● None or less than a majority of the required elements are present</li> <li>● Contradicts or is substantially inconsistent with other sections</li> <li>● Insufficient detail to understand the proposal, which includes: <ul style="list-style-type: none"> <li>○ Copying responses from a prior applicant’s application</li> <li>○ Copying statutory, regulatory, or policy/guidance language</li> <li>○ Plagiarizing information from other publicly available material</li> </ul> </li> <li>● Includes statements that violate or conflict with the requirements of law</li> <li>● Incoherent or confusing</li> <li>● The proposal is patently unreasonable or unrealistic</li> </ul>

<b>ACADEMIC FRAMEWORK ANALYSIS</b>
<p>The applicant team of the proposed Sun Mountain Community School presents an Academic Framework that begins with its Mission Statement:</p> <p style="margin-left: 40px;">The Sun Mountain Community School (SMCS) is a community of families and educators dedicated to cultivating the intellectual, social, emotional, physical and consciousness capacities of the developing human being. Our mission is to educate the whole child, using an age-appropriate approach to content and skills based on principles of Waldorf Education and the work of Rudolf Steiner. Our students engage in rigorous academics, develop connections to the natural world and moral discernment, and achieve an appreciation of themselves and others.</p> <p>Following is a summary of ratings based on the expectations/criteria of this Academic Framework.</p>

Sun Mountain Community School’s Academic Framework received ratings of Meets the expectations for 0 of 17 indicators, Approaches the expectations for 4 of 17 Indicators and Does Not Meet the expectations for 13 of 17 rated Indicators.

The applicant’s dedication to implementing the Waldorf philosophy and methodologies led to challenging choices. One such challenge was a decision to adhere to Waldorf requirements and teach Common Core State Standards at Waldorf recommended grade levels or adjust the Waldorf curriculum to adhere to Common Core State Standards which are required to be taught at specific grade levels. This challenge centered around the decision of when to explicitly teach reading. The Waldorf developmental model focuses on writing as a pathway to reading and therefore reading instruction does not occur in Waldorf Kindergartens.

### **ORGANIZATIONAL FRAMEWORK ANALYSIS**

Sun Mountain Community School’s Organizational Framework Meets the expectations for 5 of 23 indicators, Approaches the expectations for 16 of 23 Indicators and Does Not Meet for 2 of 23 rated Indicators.

The five areas of response that were rated as “Meets” include the following:

- Governing Body Self Evaluation Plan;
- Organizational Chart;
- Job Descriptions for Certified/Licensed Staff;
- Parental, Professional Educator and Community Involvement in Governance; and,
- Facilities/School Environment.

Responses that were rated as “Does Not Meet” included:

- Staffing Needs and Plan; and,
- Governing Body Plan for Monitoring Outcomes.

The rating of “Approaches” was designated for all other subsections.

### **FINANCIAL FRAMEWORK ANALYSIS**

The proposed Sun Mountain Community School’s Financial Framework Meets the expectations for 3 of 11 indicators, Approaches the expectations for 2 of 11 Indicators and Does Not Meet for 6 of 11 rated Indicators.

Numerous concerns are noted within the proposed Financial Framework section. For example 10 concerns were identified within the 910B5 section, 22 concerns were identified within the proposed Five-Year Budget Plan, and 9 concerns were identified within the Budget Adjustments section.

### **OVERALL ANALYSIS**

Of a total of 51 indicators, 8 are rated as Meets, 22 are rated as Approaches, and 21 are rated as Does Not Meet.

Based on the Independent Review Team’s analysis and ratings of the responses to the required expectations/criteria, the applicants have not sufficiently met the requirements set forth in this 2024 New Charter School Application.

## I. Academic Framework

### A. Mission and Vision

<u>A. (1)</u>	<u>MISSION</u>
Rating	Expectations
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify how the proposed school will achieve its mission.</li> <li>● Discuss the importance of the mission to your proposed community</li> <li>● Be clear, concise, innovative, and measurable</li> <li>● Discuss what mission success will look like</li> </ul>

The applicant team’s response Does Not Meet the expectations for this section.

The mission statement is as follows:

The Sun Mountain Community School (SMCS) is a community of families and educators dedicated to cultivating the intellectual, social, emotional, physical and consciousness capacities of the developing human being. Our mission is to educate the whole child, using an age-appropriate approach to content and skills based on principles of Waldorf Education and the work of Rudolf Steiner. Our students engage in rigorous academics, develop connections to the natural world and moral discernment, and achieve an appreciation of themselves and others.

The description of mission success relates more to general school success (prepared for postsecondary education, lifelong learning, lower truancy/absenteeism, happier students) than one would expect in a Waldorf focused specific mission. However, it is unclear how the connection to the natural world and moral discernment will be observed. It is also unclear how moral discernment will be observed.

Reference is made (link provided in the application) to a document elaborating on Core Principles from the Alliance for Public Waldorf Education which includes references to Rudolf Steiner's insights as a primary source of guidance for an understanding of the image of the human being and a source of guidance for developing an active, inner meditative life and an understanding of the dynamics within society. The image of the human being is defined in the first of seven core principles described in the reference document. Yet the extent of the "work of Rudolf Steiner" to be implemented by the

proposed school is unclear. The “work of Rudolf Steiner” is not defined anywhere in the application narrative.

Two mission-based goals are included in the narrative; however, they do not include specific measurable targets for success.

The proposed community input was 115 families; about 1/3 of the respondents stated they did not have children. It is unclear how many of the 115 responses to the outreach survey were from outside the community of the previous Waldorf school.

<b>A.(2)</b>	<b><u>VISION STATEMENT</u></b>
<b>Rating</b>	<b>This narrative will be rated for completion, not content</b>
<b>Complete</b>	<p>A complete response must describe</p> <ul style="list-style-type: none"> <li>• The team’s reasoning and purpose</li> <li>• Why your team is committed to providing a public education platform for your proposed community</li> <li>• How your team intends to interact with your proposed community in order to provide their children with better academic outcomes</li> <li>• What about your proposed program serves the proposed community in unique and innovative ways?</li> </ul>

The applicant team’s response for this section is complete.

<b>A. (3)</b>	<b><u>UNIQUENESS AND INNOVATION</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>• Describe the uniqueness, innovation, and significant contribution of your educational program to the local NM public education environment;</li> <li>• Describe the needs of the community; and</li> <li>• Demonstrate how the applicant team knows there is a compelling demand for the proposed school’s educational program in the geographic area in which the school plans to locate.</li> <li>• Ensure that the evidence establishes a compelling demand for the proposed school’s educational program based on reliable research, effective practices, or demonstrated success in schools with diverse characteristics.</li> </ul>

The applicant team’s response Does Not Meet the expectations for this section.

The applicant team provides a robust description of the uniqueness and innovation of the proposed school’s educational program supported by an impressive list of references including research.

However, the narrative does not include or reference the needs of the community and fails to demonstrate a compelling demand for the proposed school's educational program in the geographic area in which the school plans to locate.

While bringing New Mexico history into Spanish classes could be considered innovative, stating that New Mexico History will be taught in accordance with NM Common Core Standards is not.

A concern is noted over evidence provided showing that the Waldorf school has students underperforming compared to traditional schools until 4th grade in Reading and around 6th-7th in Math. Since the school proposes to serve grades K-8, this evidence shows students would underperform until close to the end of the grade levels served. This does not demonstrate a need for the area given New Mexico students historically are already underperforming.

A related concern is also noted on page 28 of the application under The Approach to Kindergarten section.

Directed academic instruction and activities are purposefully de-emphasized in the Waldorf-methods Kindergarten; the emphasis lies on the foundation (pre-academic) skills and experiences. Waldorf-inspired schools recognize that the young child learns primarily through imitation and example, and that their learning is best supported in a home-like setting grounded in practical activities that are of immediate interest.

The review team's understanding is that direct instruction in reading at the kindergarten level may or will be intentionally withheld.

## B. Mission-Specific Goals

B.	<u>Mission-Specific Goals</u>
Rating	Expectations
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Include two mission-specific goals;</li> <li>● Align to the student outcomes identified in the mission response (A.1.);</li> <li>● Be guided by the elements of the SMART format:</li> <li>● Include measures and metrics.</li> <li>● Include how the board of the proposed school intends to regularly monitor equitable mission success</li> </ul>

The applicant team's response Does Not Meet the expectations for this section.

The actual goals were not provided in this section. Analysis is based on the goals stated in A. (1) on page 8 of the application.

Goal 1 identifies Panorama Education’s Social and Emotional Learning Student Survey as the assessment tool but does not include outcome metrics. Goal 2 addresses two core principles of Public Waldorf Education, educating the community and increasing diversity and access to all sectors of society. Goal 2 does not focus on student outcomes which is an expectation. In particular, Goal 2 is not in SMART format.

How the board intends to regularly monitor equitable mission success is discussed briefly in this section. However, the monitoring activities will require additional rigor in the process to achieve meaningful results.

### **C. Curriculum, Educational Program, Student Performance Standards**

C.	<b><u>Curriculum, Educational Program, Student Performance Standards</u></b>
Rating	Expectations
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Describe the proposed school’s curriculum <i>including research-based evidence that supports the effectiveness of the selected model and the target population</i>;</li> <li>● Describe how the proposed school’s curriculum will meet the requirements of equity for all underserved populations.</li> <li>● Identify information that demonstrates how the curriculum will align with the New Mexico Common Core State Standards (CCSS) and New Mexico Content Standards;</li> <li>● Identify information that demonstrates how the curriculum will align with the proposed school’s mission; and</li> <li>● Include a reasonable (as based on the professional judgment of experienced educators) timeline and plan for the development of the entire proposed curriculum—including scope and sequence, unit plans, daily lesson plans, project plans and rubrics, and unit and course assessments.</li> </ul>

The applicant team’s response Does Not Meet the expectations for this section.

The applicant team’s response provided within the application and attachments indicates that some state standards will be taught at different grade levels than those required by CCSS. The applicant team has chosen not to align with New Mexico Standards. The response would not meet solely based on this idea. If approved, the school would have to modify its entire curriculum.

Note: The applicant team did not respond to the prompt in the space provided within the application. A set of attachments was provided. The applicant team referred reviewers to Attachment 10, 11, 12, and 13. Literacy: Does not clearly align with CCSS - Decoding does not begin until 1st grade; LETRS is being used which is based on the science of reading. According to the science of reading, research indicates that there are children ready to begin reading in kindergarten.



Math: There are research-based strategies incorporated into the curriculum; however, there isn't adequate evidence of research to support the curriculum.

While the attachments provided do align Kindergarten curriculum with CCSS and NM Content Standards, the same is not done for grades 1-8.

Although the applicants address equity for all underserved populations, the narrative focuses primarily on structured literacy, experiential learning techniques, and a multimodal curriculum. The response does not adequately address how the school's curriculum will meet the requirements of equity for ALL underserved populations. For example: Special education.

**D. Bilingual Multicultural Education, Indian Education, Hispanic Education and Black Education**

<b>D(1).</b>	<b>Bilingual Multicultural, Indian, Hispanic and Black Education Acts</b>
<b>Rating</b>	<b>Expectations</b>

<b>Approaches</b>	<p>A complete response must ensure equal education opportunities for students in New Mexico by:</p> <ul style="list-style-type: none"> <li>● Addressing the goals of the Bilingual Multicultural Education Act (NMSA §22-23-1) including: <ul style="list-style-type: none"> <li>○ providing students with opportunities to expand their conceptual and linguistic abilities and potentials in a successful and positive manner;</li> <li>○ teaching students to appreciate the value and beauty of different languages and cultures; and</li> <li>○ meeting state academic content standards and benchmarks in all subject areas.</li> </ul> </li> <li>● Addressing the goals of the Indian Education Act (NMSA §22-23A-1) including: <ul style="list-style-type: none"> <li>○ Ensuring equitable and culturally relevant learning environments and culturally relevant instructional materials for American Indian students</li> <li>○ Providing for the study, development and implementation of educational systems that affect the educational success of American Indian students to close the achievement gap, increase graduation rates;</li> <li>○ Encouraging and fostering parental involvement in the education of their children; and</li> <li>○ Providing mechanisms to improve educational opportunities for Native American students for the purpose of closing the achievement gap, increasing graduation rates, and increasing postsecondary enrollment, retention, and completion.</li> </ul> </li> <li>● Addressing the purpose of the Hispanic Education Act (NMSA §22-23B-2), including: <ul style="list-style-type: none"> <li>○ Providing for the study, development and implementation of educational systems that affect the educational success of Hispanic students to close the achievement gap, increase graduation rates;</li> <li>○ Encouraging and fostering parental involvement in the education of their children; and</li> <li>○ Providing mechanisms to improve educational opportunities for Hispanic students for the purpose of closing the achievement gap, increasing graduation rates, and increasing postsecondary enrollment, retention, and completion.</li> <li>○ initiate and organize an equity council composed of multiple school stakeholders with the intent to create more equitable learning opportunities for marginalized students.</li> </ul> </li> <li>● Address the purpose of the Black Education Act (HB 43), including: <ul style="list-style-type: none"> <li>○ Developing and including anti-racism policies</li> <li>○ Developing curricula and instructional materials that recognize and teach black culture and anti-racism. Implementing anti-racism training for teachers and staff</li> <li>○ Opportunities to explore one’s identity and societal systems that may impact their identity and future.</li> </ul> </li> </ul>
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The applicant team’s response Approaches the expectations for this section.

The narrative provided for this section does not clearly demonstrate an understanding of the intent and requirements of the Bilingual Multicultural Education Act, Indian Education Act, Hispanic Education Act and the Black Education Act. The response provided does include recognition of how the Waldorf curriculum approaches cultures from a world point of view in its “Decolonized Curriculum”; however, the Waldorf curriculum views seem disconnected from current understandings of culturally and linguistically responsive instruction.

The applicant team’s response focuses predominantly on celebrating other cultures and barely addresses the bilingual aspect. The response does provide some information about the Spanish Language Program, but the majority of information is in an attachment provided by the applicants in addition to the required appendices.

The response provided by the applicant team for the Hispanic Education Act states it will use elements from its response to the Bilingual and Indian Education Act. Both of those responses were underdeveloped. Furthermore, what could benefit Native students would not necessarily benefit Hispanic Students. These are separate acts for a reason.

The applicant team’s response addressing the Indian Education Act lists researched methods for improving education for Native students; however, the attempt to align these methods with Waldorf pedagogy fails. Mapping the route from a student’s home to their school and a camping trip are not strong examples of placed based learning. Likewise, it is unclear how handwork and a movement curriculum create an All-Senses Experiential Learning that benefits Native students. The response says the school will utilize textbooks created by Native Americans. However, under Waldorf Instructional Philosophy it is stated that curriculum comes from the teacher and not textbooks. It is unclear how the school intends to close the gap for Native students

While the plan addresses the individual goals of each Act, a more integrated approach that shows how these goals interconnect and support each other would be beneficial. This can create a more cohesive strategy for promoting equity and inclusivity.

In summary, the plan could benefit from a more detailed timeline with specific action steps, deadlines, and clearly identified responsible staff members. This would ensure accountability and help track progress more effectively.

<b>D(2).</b>	<b>Equity Plan</b> Proposed school will create an effective and equitable system of supports for all students focused on root-cause analysis, equity-focused leadership and continuous improvement, and culturally and linguistically responsive curriculum and pedagogy
<b>Rating</b>	<b>Expectations</b>

<b>Approaches</b>	<p>A complete response must ensure equal education opportunities for students in New Mexico by:</p> <ul style="list-style-type: none"> <li>● A plan to initiate and organize an equity council composed of multiple school stakeholders with the intent to create more equitable learning opportunities for marginalized students.</li> <li>● If the proposed school is to be located in a historically defined Indian impacted school district, a plan for conducting a needs assessment to determine what supports are needed in the public charter school, at home and in the community to help Indian students succeed in school, graduate with a diploma of excellence and be prepared to enter post-secondary education or the workplace.</li> <li>● A detailed plan for the implementation of a culturally and linguistically responsive framework.</li> <li>● A detailed plan for attracting and retaining quality and diverse teachers to teach New Mexico’s multicultural student population</li> </ul>
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The applicant team’s response Approaches the expectations for this section.

The detailed steps and action plans outlined in the applicant team’s response are comprehensive and align well with the required focus areas.

Missing, however, is a detailed plan for attracting and retaining quality and diverse teachers to New Mexico’s multicultural student population.

**E. Graduation Requirements**

<b>E.</b>	<b><u>Graduation Requirements.</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Not Applicable</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify all of the proposed school’s graduation requirements;</li> <li>● Provide an explanation of how the proposed school will support students behind on graduation to earn a diploma.</li> <li>● Provide proposed Alternative Demonstration of Competency policies, if any</li> <li>● Align to state graduation requirements OR explicitly identify all requirements that vary from state minimum requirements; and</li> <li>● If there are variances from state minimum requirements explain the following: <ul style="list-style-type: none"> <li>○ why the proposed school believes the change is important</li> <li>○ how the change supports the mission</li> <li>○ how the change ensures student readiness for college, career, or other post-secondary opportunities.</li> </ul> </li> </ul>

This section is Not Applicable. This proposal is for a K-8 school.

## F. Instruction

<b>F.(1) Instruction</b>	<b><u>Teaching and Instructional Philosophy</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>• Describe the teaching and instructional philosophy of the proposed school;</li> <li>• Identify primary instructional methods to be implemented that ensure equity and that align to the philosophy;</li> <li>• Identify information that demonstrates the instructional methods are research-based; and</li> <li>• Describe how the educational philosophy and instructional methods support and align to the mission and curriculum.</li> <li>• How the proposed instructional methods will best support the population the school intends to serve.</li> </ul>

The applicant team's response Approaches the expectations for this section.

The information provided by the applicant team provides a cohesive overview of the educational philosophy and instructional methods to be implemented at the proposed Sun Mountain Community School, demonstrating alignment with the school's mission and curriculum.

The narrative response, however, states that teachers will follow CCSS, which contradicts prior answers saying the school will not cover certain standards until later grades to align with the Waldorf approach.

Not addressed is how the proposed instructional methods will support the population the school intends to serve. Additionally, more information is needed on ensuring equity.

<b>F.(2) Instruction</b>	<b><u>Yearly Calendar and Daily Schedule</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Include a yearly calendar that identifies the following: <ul style="list-style-type: none"> <li>○ Annual start date and end date</li> <li>○ Teacher professional development days and times</li> <li>○ School-wide assessment periods</li> <li>○ School days, holidays, and partial days</li> <li>○ Teacher parent conferences;</li> </ul> </li> <li>● Include a daily schedule that identifies the following: <ul style="list-style-type: none"> <li>○ Instructional times</li> <li>○ Break times</li> <li>○ Start and end times</li> <li>○ Differences in the daily schedule for full and partial days;</li> </ul> </li> <li>● Meet all minimum hour (total instructional time) requirements laid out in NMSA 22-2-8.1;</li> <li>● Describe how the calendar and schedule support the proposed school’s educational program;</li> <li>● Describe how the calendar and schedule are optimal for achieving high outcomes for the anticipated student population;</li> <li>● Describe the extended learning time programs to improve academic success of students and professional learning of teachers;</li> <li>● If this is an elementary school, and you are participating in k-5 plus or extended learning program, describe the k-5 plus program and extended learning program and provide your calendar for year 2; and</li> <li>● Be supported by the proposed budget found in the Financial Framework section of the application.</li> <li>● Describe how the proposed calendar supports and values the community it intends to serve.</li> </ul>
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The applicant team’s response Does Not Meet the expectations for this section.

The applicant team described how the schedule supports the program, the curriculum and the community being served.

However, the following concerns have been noted:

- School-wide assessment periods are not provided.
- The calendar begins in August and ends in July. It needs to begin in July and end in June.
- The total instructional hours on the proposed calendar equal 1079 hours. The minimum requirement for instructional hours in 2024 is 1140 hours.
- They have not indicated what additional days are included for K-12 plus funding which was included on 910B-5 form.
- The days on the school calendar for 2025-2026 don't always align to the narrative. There are 179 school days, not 183 totaled on the calendar.
- The applicants state that they can claim a full school day for their Friday early release days. This is not in statute.
- Applicants did not state how long the lunch period was.

- The school did not meet minimum requirements based on given information and assumptions. They were short by 6 hours. If their 1/2 day has a lunch, they will be shorter.
- In the narrative the applicants state that students are dismissed at 1:05 pm on Fridays but on all schedules provided, dismissal is at either 12:35 pm or 1:35 pm.

F.(3) Instruction	<u>How Instruction will be effective for the student population.</u>
Rating	Expectations
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify the anticipated student population, including: <ul style="list-style-type: none"> <li>○ Demographic information based on the local community population</li> <li>○ Educational proficiency based upon enrollment at the school</li> <li>○ Attendance and truancy trends</li> <li>○ English language proficiency</li> <li>○ Diverse populations</li> <li>○ At-Risk populations</li> <li>○ Special Educational needs;</li> </ul> </li> <li>● Explain any special factors influencing the makeup of the anticipated student population;</li> <li>● Explain how the educational philosophy has been designed to meet students' needs;</li> <li>● Explain how the instructional methods have been designed to meet students' needs and specifically how they will meet the needs of at-risk students; and</li> <li>● Explain how the yearly calendar and daily schedule have been designed to meet students' needs.</li> <li>● Explain how the yearly calendar and daily schedule have been designed to meet students' needs.</li> </ul>

The applicant team's response Does Not Meet the expectations for this section.

The applicant team's response does not address diverse populations and does not explain how the yearly calendar and daily schedule have been designed to meet teachers' needs.

The application cites that one of every five students is identified as special education because they have a disability or are gifted. This does not reflect the Santa Fe Public Schools district itself. It also does not account for disability or gifted or levels of disability. The school anticipates 20 special education students in its first year, but the school expects a total of 82 students in its first year. If 20 were special education students that would be 24% of the total population, which is more than the 1 in 5 cited.

The applicant team's response states that the school cannot identify gifted students until after spring testing the first year. They do not address students that enroll who are already identified as gifted.

The team indicates it only is planning outreach to one zip code outside the one in which it is located.

**G. Special Populations**

G.(1a)	<u>Instructional Services and Supports for Students with IEPs</u>
Rating	Expectations
<b>Does Not Meet</b>	<p>A complete response must</p> <p>Describe how the proposed school will identify and provide:</p> <ul style="list-style-type: none"> <li>● instructional supports and services to the spectrum of needs of students with disabilities, who have IEPs or are eligible for an IEP;</li> <li>● instructional supports and services to gifted students who have IEPs or are eligible for an IEP;</li> </ul> <p>Describe how the proposed school will</p> <ul style="list-style-type: none"> <li>● Ensure that students who are ELs are not over-identified as students with disabilities;</li> <li>● Identify specific responsibilities for school staff, classroom teachers, and special education staff; and</li> <li>● Identify specific training and support that will be provided to teachers and school staff to ensure they are able to fulfill their responsibilities.</li> </ul> <p>Describe the proposed school's:</p> <ul style="list-style-type: none"> <li>● Timeline, benchmarks, and people responsible for developing discipline policies and protocols for your special populations.</li> <li>● Capacity of the school district in the geographic boundaries of the proposed school to provide special education services and FAPE.</li> <li>● Process for tracking this protected population's progress and services, how that will be reported to the board.</li> </ul>

The applicant team's response Does Not Meet the expectations for this section.

The applicant team describes how the school will provide instructional services/supports to students with an IEP for both students with disabilities and gifted. However, the descriptions lack detail.

The applicant team did not address the capacity of the school district to provide SPED services. Most of the special education positions listed in the Figure 34 table in this section of the application are not in the budget. There are no special education teachers included in the budget.

The timeline given for developing discipline policies and protocols for special populations is too broad. The applicant team indicates it will be completed by the time the school launches. No benchmarks are given.

The capacity of the School District is not addressed.



The school will provide data to the Board as part of the reporting process; however, the process is undefined.

<b>G. (1b)</b>	<b><u>Monitoring and Evaluation of Special Education Students</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>• Describe how the proposed school will monitor the progress toward special education students’ attainment of IEP goals;</li> <li>• Identify specific responsibilities for school staff, classroom teachers, and special education staff; including when and who will be reporting on progress towards goals.</li> <li>• Identify the regular intervals at which progress will be monitored and success will be evaluated;</li> <li>• Identify specific actions/reporting that will engage and inform students and or families; and</li> <li>• Describe how the school will evaluate the effectiveness of its special education program and services.</li> <li>• Describe how mission success will be tracked, measured, ensured and reported on with these special populations.</li> </ul>

The applicant team’s response Approaches the expectations for this section.

While the explanation provides a description of how the school will regularly evaluate and monitor progress and success of special education students, it remains unclear as to the frequency, method and tools that will be used.

Specific actions/reporting that will engage and inform students and or families are not fully addressed.

How mission success will be tracked, measured, ensured and reported on with these special populations is not appropriately described.

<b>G.(2a)</b>	<b><u>Required Curriculum and Instructional Supports for English Learners</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>• Describe how the proposed school will identify English Learners (ELs) and provide the required curriculum and instructional services/supports to students identified as ELs;</li> <li>• Identify how the school will implement the English Language Development Standards for ELs in its school;</li> <li>• Identify how the school will provide ELs with instruction and support to develop English language proficiency;</li> <li>• Identify how the school will provide ELs with access to grade-level content;</li> <li>• Describe how the school will address the spectrum of needs that ELs may present;</li> <li>• Identify specific responsibilities for school staff and classroom teachers; and</li> <li>• Identify specific training, professional development and support that will be provided to teachers and school staff to ensure they are able to fulfill their responsibilities;</li> <li>• Describe the proposed school’s process for tracking this protected population’s progress and services, how that will be reported to the board.</li> </ul>
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The applicant team’s response Does Not Meet the expectations for this section.

Bilingual models do not include "inclusion" as described in the narrative. They consist of: maintenance, transitional, two-way, full immersion, and ESL. English Language Learners are REQUIRED, by law, to receive 45 minutes (minimum for elementary) of daily ELL instruction. The explanation states "when possible, students can receive their 45 minutes of daily ELL instruction." Middle school students must be offered an ELD course.

Of additional concern:

- The applicant team’s response does not address how students not new to public education in New Mexico will be identified as EL.
- MLSS is not to be used to identify ELs.
- The response does not answer how the school will implement the English Language Development Standards
- Listing how the school will be evaluated for protecting the rights of ELs does not say how they will protect the rights of ELs

<b>G.(2b)</b>	<b><u>Monitoring and Evaluation of English Learners</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Describe how the proposed school will monitor the progress of ELs toward English language proficiency, both annually and within the school year;</li> <li>● Identify specific responsibilities for school staff and classroom teachers;</li> <li>● Identify the regular intervals at which progress will be monitored;</li> <li>● Identify specific actions/reporting that will engage students and/or families;</li> <li>● Describe how the school will evaluate the effectiveness of its EL program and services; and</li> <li>● Describe how the school will monitor exited EL students (reclassified fluent English proficient students—RFEPs) for two years for academic progress.</li> </ul>
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The applicant team’s response Does Not Meet the expectations for this section.

Concerns noted:

- Parents cannot decide if an EL is reclassified. The student either passes the WIDA test (the only one that can be used to determine proficiency) or the student does not.
- Progress will only be monitored at the beginning and end of year.
- The reporting process to students and families is underdeveloped.
- The response does not address monitoring of exited EL students.

Additionally, it is the opinion of the review team that the responsibilities of family and community communications, professional communications and work with contract vendors should not fall on the Operations Manager who is not involved in the faculty, curricular, instructional materials or student progress functions of the school and should not be reporting to families or the community regarding instructional effectiveness or programmatic or student issues. Assigning these tasks to the Operational Manager will hinder the effectiveness of this process as he/she will not be qualified to participate and contribute effectively to the educational and programmatic part of this process, nor will be able to create effective communication regarding these areas. These tasks should be assigned to the Educational Leadership team who are well versed and qualified to implement this function.

<b>G.(3)</b>	<b><u>Plan to adhere to ESSA and State Statutes</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Does Not Meet</b>	<p>A complete response must</p> <p>Describe how the proposed school will:</p> <ul style="list-style-type: none"> <li>● Develop an educational framework to address the educational needs of Native American, Hispanic, Black and bilingual multicultural students within a culturally and linguistically responsive approach to learning;</li> <li>● Identify specific responsibilities for school staff and classroom teachers, including professional development for teachers;</li> <li>● Ensure that the best practices are used in teaching, mentoring, counseling and administration are culturally and linguistically responsive to students;</li> <li>● Ensure policies will be culturally and linguistically responsive;</li> <li>● Demonstrate rigorous and culturally meaningful curricula and instructional materials will be developed and implemented;</li> <li>● Identify the regular intervals at which progress will be monitored;</li> <li>● Identify specific actions/reporting that will engage students and/or families; and</li> <li>● Evaluate the effectiveness of its programs to improve educational outcomes.</li> <li>● Describe how the proposed school will meet the specific requirements of the Black Education Act</li> </ul>
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The applicant team’s response Does Not Meet the expectations for this section.

Concerns noted:

- The applicant team’s response does not demonstrate that rigorous and culturally meaningful curricula and instructional materials will be developed and implemented.
- The response does not ensure best practices.
- Supplemental programs or services are not included.
- The response does not identify the regular intervals at which progress will be monitored.
- The response does not identify specific actions/reporting that will engage students and/or families.
- The response does not evaluate the effectiveness of its programs to improve educational outcomes.
- The response does not describe how the proposed school will meet the specific requirements of the Black Education Act.

**H. Assessment and Accountability**

<b>H.(1)</b>	<b><u>Assessment Plan</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Include an assessment calendar that identifies all state or district mandated assessment periods and dates related to teacher analysis/use of assessment data to inform instruction <ul style="list-style-type: none"> <li>○ Include assessments/progress monitoring for special populations;</li> </ul> </li> <li>● Identify, for all state or district mandated assessment periods, the grade levels at which the assessments will be administered;</li> <li>● Describe, for all state or district mandated assessment periods, the specific data that will be collected, reported, analyzed, evaluated, and utilized to inform instruction;</li> <li>● Describe how the data identified will be used to inform instruction;</li> <li>● Describe the school’s philosophy on the use of data and how teachers will be onboarded, trained and supported to ensure the schools philosophy is followed;</li> <li>● Align with all state assessment and data reporting requirements;</li> <li>● Describe how the assessment plan meets the specific needs to equitably assess the proposed school’s projected student population;</li> <li>● Describe how the assessment plan aligns to the proposed school’s mission and any assessments that may be used to determine, measure and track equitable mission achievement; and</li> <li>● Include any assessments that may be negotiated as part of the performance framework and contract.</li> </ul>
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The applicant team’s response Does Not Meet the expectations for this section.

The applicant team’s response combines multiple aspects (data analysis, reporting, communication) into a single narrative, making it difficult to follow. Clear segmentation and headings for each section would improve readability and comprehension.

The narrative needs to provide specific examples of how data analysis will inform instructional practices and interventions. There is a brief mention of ongoing program evaluation, but the text does not emphasize a structured process for continuous improvement based on data analysis. A clear plan for regular review and refinement of instructional practices is necessary.

Additional concerns noted:

- The WIDA ACCESS is not a test for special education.
- The applicant team is proposing to use CCSS that have been aligned to Waldorf standards, rather than using Waldorf standards that have been aligned to CCSS.
- Does not describe, for all state or district mandated assessment periods, the specific data that will be collected, reported, analyzed, evaluated, and utilized to inform instruction.
- Does not describe the school’s philosophy on the use of data and how teachers will be onboarded, trained and supported to ensure the schools philosophy is followed.
- Does not describe how the assessment plan meets the specific needs to equitably assess the proposed school’s projected student population.

- Does not describe how the assessment plan aligns to the proposed school’s mission and any assessments that may be used to determine, measure and track equitable mission achievement.

<b>H.(2)</b>	<b><u>Plan for Data Assessment Analysis</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>• Identify the processes the school will use, including specific action steps, triggers that would prompt action steps, responsible parties, timelines, and associated costs, to <ul style="list-style-type: none"> <li>○ monitor academic performance and</li> <li>○ take appropriate corrective action if the school is not on track to or does not meet academic performance expectations;</li> </ul> </li> <li>• Address specific responsibilities related to <ul style="list-style-type: none"> <li>○ meeting student academic achievement or growth expectations <u>at the school-wide level</u> and</li> <li>○ meeting student academic achievement goals <u>at the individual student level</u> (remediation/at-risk student); and</li> </ul> </li> <li>• Describe how the school will regularly evaluate the effectiveness of its academic program generally and the effectiveness of specific corrective actions or interventions.</li> <li>• Describe how the proposed school intends to use the data gathered from assessments to drive instruction</li> <li>• Describe the board's role in analyzing the data gathered to inform school wide progress and potential changes.</li> </ul>

The applicant team’s response Does Not Meet the expectations for this section.

This applicant team’s response did not address the following areas:

- The processes the school will use include specific action steps, triggers, responsible parties and timelines.
- The responsibilities relating to student achievement or growth.
- How the school will regularly evaluate the academic program or corrective interventions.
- The board’s role in analyzing this data to inform school wide progress and potential changes.

<b>H.(3)</b>	<b><u>Plan for Student Progress/Achievement &amp; Communication Plan</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify how student achievement and progress will be communicated to <ul style="list-style-type: none"> <li>○ Students</li> <li>○ Parents</li> <li>○ The governing body</li> <li>○ The authorizer</li> <li>○ The broader community;</li> </ul> </li> <li>● Identify the communication plan for each of the specific sources of student achievement data identified in H.(1) and any other relevant sources of student achievement data; and</li> <li>● Provide information that demonstrates the plan is effective in reaching the targeted population and the specific community in which the school plans to locate.</li> </ul>
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The applicant team’s response Does Not Meet the expectations for this section.

The applicant team’s response for this section did not provide a comprehensive plan for how student assessment and progress will be appropriately communicated to students, parents, the proposed schools governing body, and the authorizer. The focus of the response is on use of a Student Information System (SIS) that the school would typically utilize for alerts and notifications, attendance tracking, and grades.

The response also did not identify a communication plan for each of the specific sources of student achievement data identified in H.(1).

## II. Organizational Framework

### **A. Governing Body Creation/Capacity**

A charter application shall include a description of the governing body and operation of the charter school, including: (1) how the governing body will be selected; (2) qualification and terms of members, how vacancies on the governing body will be filled and procedures for changing governing body membership; and (3) the nature and extent of parental, professional educator and community involvement in the governance and operation of the school (NMSA 22-8B-8(l)).

<b>A.(1)</b>	<b><u>Key Components of Governance Structure</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Include governing body bylaws in <b>Appendix A</b>; and</li> <li>● Summarize <u>key</u> governance components in the application response as follows: <ul style="list-style-type: none"> <li>○ Membership structure (number, roles, length of terms)</li> <li>○ Officer structure (roles, election process, responsibilities, length of terms)</li> <li>○ Committee structure that includes both legally required committees and school-specific committees (selection process, responsibilities, membership, length of service terms)</li> <li>○ Member recruitment, selection, discipline, and removal processes.</li> </ul> </li> </ul>
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The applicant team’s response Approaches the expectations for this section.

Concerns for this section are noted as follows:

- The described membership of the audit committee is inaccurate. It must consist of two board members, one volunteer member who is a parent of a student attending that school district and one volunteer member who has experience in accounting or financial matters.
- The applicant team’s response does not summarize all key governance components. Examples: officer terms, member roles, selection process for committees.
- The Committee Details section implies that only members of those committees must complete specific training such as Finance Committee members taking fiscal training. ALL board members must complete training hours in all categories as defined by NMAC.
- The Recruitment and Selection section states that school board members shall be recruited and selected based on the qualities, qualifications, and priorities determined by the school board. These qualities and qualifications have not been defined
- Duties and Responsibilities state what members shall not do, but not what they are required to do.

<b>A.(2)</b>	<b><u>Governing Body Qualifications</u></b>
<b>Rating</b>	<b>Expectations</b>



<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify all qualifications and skill sets that the governing body will require and ensure those are represented within its regular membership and how the proposed board would be able to ensure the long-term success of this school if, by some circumstance, the Founders were no longer involved.</li> <li>● Explain why and how the identified qualifications and skills will ensure the governing body has the required capacity and enable the governing body to operate a successful, high-quality public school;</li> <li>● Describe how the board will ensure robust board membership including training expectations, time commitments, and member onboarding.</li> <li>● Include a list of all proposed initial governing body members, describe each proposed member’s specific qualifications and skill sets through verifiable prior experience, and ensure the represented qualifications and skill sets align with the previously identified qualifications and skill sets that the governing body will require.</li> </ul>
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The applicant team’s response Approaches the expectations for this section.

Concerns for this section are noted as follows:

- On page 155 within the School Board Member Qualifications section the narrative states: It is preferred that at least 1-2 members be community members with strategic areas of expertise that support the mission and goals of the school, including Anthroposophy and/or Waldorf pedagogy. Anthroposophy has not been defined as a requirement or skill set anywhere in the application.
- The applicant team’s response does not address how the identified qualifications and skills will ensure capacity to operate a successful school.
- How the board will ensure robust board membership is not addressed.
- The applicant team did not provide a list of all members’ skill sets through verifiable prior experience to align with the identified qualifications and skill sets.
- The response does not fully guarantee long-term success. It states there will be an onboarding process but does not describe said process. Founders are not mentioned.

<b>A.(3)</b>	<b><u>Selection of Governing Body Members</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify a regular and ongoing governing body recruitment process, including identification of action steps, timelines, and responsible parties;</li> <li>● Describe the onboarding process, the board’s role in chartering and re-chartering, authorizer relations, and time commitment.</li> </ul>
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The applicant team’s response Approaches the expectations for this section.

Concerns for this section are noted as follows:

- Authorizer relations are not addressed.
- The role in chartering and re-chartering is partially described. There is no description of the renewal process such as renewal hearings.
- "Voting on new board members will take place at least 30 days prior to the expiration of the term of a departing member in accordance with the Bylaws." The bylaws state that when possible, a vacancy shall be filled at least 45 days before departure.
- Section A (2) would need to be amended to contain verifiable prior experience of potential Governing Board members and the necessary skill sets to ensure the success of the school in order for this selection plan to be successful.

**B. Governing Body Training and Evaluation**

<b>B.(1)</b>	<b><u>Governing Body Training Plan</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify a process for governing body member onboarding to ensure new members are properly trained and able to meet the obligations and fulfill the responsibilities of governing body service, include action &amp; monitoring steps, timelines, and responsible parties;</li> <li>● Describe how the plan will identify governing body training needs, meet governing body training needs, and comply with state requirements, including any requirements that may change from year to year;</li> <li>● Identify any costs required to support the training plan or onboarding process and describe how those costs are supported in the budget; and</li> <li>● Develop an onboarding process and training that all new board members will be expected to complete including an outline of topics, who will be responsible for onboarding new board members, timeline for onboarding, and procedure for gathering feedback on the effectiveness of the onboarding process.</li> <li>● Ensure the onboarding process and training plan address training on the open meetings act and responsibilities.</li> </ul>

The applicant team’s response Approaches the expectations for this section.

Concerns for this section are noted as follows:

- The applicant team’s narrative does not address training on the Open Meetings Act and responsibilities in this section.
- The training hours listed in Figure 38-Training requirements for the first year of service on the board are incorrect. The figure actually lists continuing board member requirements.
- The onboarding process is underdeveloped with the only topics being bylaws and a training calendar. There is also no discussion of the Open Meetings Act. This onboarding process would not adequately prepare a new board member to serve this specific board.

<b>B.(2)</b>	<b><u>Governing Body Self-Evaluation Plan</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Meets</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>• Identify a plan for annual governing body self-evaluation, include action steps, timelines, responsible parties, timeline on the annual board calendar and identified criteria or standards; and</li> <li>• Describe how the identified plan will focus on and support continuous improvement.</li> </ul>

The applicant team’s response Meets the expectations for this section.

### **C. Leadership and Management**

<b>C.(1)</b>	<b><u>Governing Body Plan for Monitoring Outcomes</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify a plan for how the governing body will monitor academic performance on an ongoing basis, include action steps, timelines, responsible parties, and identified criteria or standards;</li> <li>● Identify a plan for how the governing body will monitor organizational performance on an ongoing basis, include action steps, timelines, responsible parties, and identified criteria or standards;</li> <li>● Identify a plan for how the governing body will monitor financial performance on an ongoing basis, include action steps, timelines, responsible parties, and identified criteria or standards; and</li> <li>● Describe how each of the monitoring plans will focus on ensuring the school is meeting its mission, providing a quality education, and acting as a responsible public entity.</li> <li>● Describe how all of the above will be reflected in meeting agendas and the annual board calendar</li> </ul>
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The applicant team’s response Does Not Meet the expectations for this section.

Although the narrative includes some general plans for monitoring organizational, financial and academic outcomes, the plans are not clear, comprehensive or cohesive. The plans presented generally do not include action steps, timelines, responsible parties and identified criteria or standards.

In their narrative they state finance reports will start monthly and may be moved to quarterly and given by an outside CPA firm. This would not comply with statute or lead to successful monitoring of finances. It appears the responsibility of presenting them with the right information is given to the Head of School and others rather than the board being aware that they are the responsible individuals for establishing oversight and ensuring success.

A 3-year Budget look ahead planning is on the board’s schedule for January, however no mention is made of the board's role in overseeing and approving the annual budget which is not done until the springtime when all pertinent values including 40/80- and 120-days MEM, and unit value and other information are available in order to prepare the budget. The governing council is responsible for understanding and approving this budget.

No mention is made of the participation and oversight of the annual audit and how this will guide the board in its financial monitoring and adjustments to policies and procedures of the school to meet compliance and changing statutes and regulations throughout the year.

Additional concerns for this section are noted as follows:

- The applicant team’s response does not address organizational performance beyond reporting and mission goals.
- The response does not address factors such as staffing, teacher retention, complaint process, etc.

- The response does not describe how each of the monitoring plans will focus on ensuring the school is meeting its mission, providing a quality education, and acting as a responsible public entity.
- The financial monitoring plan is extremely weak and does not contain a comprehensive plan for the full scope of their financial oversight responsibilities.
- Finance reports must be given at every board meeting and adjustments to finances must be addressed as they present themselves on a monthly basis at a minimum.

C.(2)	<u>Plan for Hiring Head Administrator</u>
Rating	Expectations
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify an ongoing process for hiring a head administrator, both for the initial hiring and for any time the position becomes vacant, include action steps, timelines, responsible parties, and identified criteria or standards;</li> <li>● Identify all leadership characteristics and all qualifications the head administrator must possess;</li> <li>● Explain why and how the identified leadership characteristics; including educational background, experience and qualifications will ensure the head administrator has the required capacity and enable the head administrator to operate the proposed school as a successful, high-quality public charter school ;</li> <li>● Explain how the identified leader, both for the initial hiring and for any time the position becomes vacant, will be on boarded including setting the expectations of how they will be reporting to, and working for and with the board.</li> <li>● Describe how the identified process will ensure the school is able to identify and equitably (openly advertise and interview multiple candidates) hire a highly qualified, licensed administrator ; and</li> <li>● If a potential head administrator has already been identified and/or is a founder, include an assurance that the individual understands they must be selected and hired by an independent governing body and identify the individual’s specific leadership skills and qualifications, through verifiable prior experience, that makes them qualified for the position, including holding the required licensure.</li> </ul>

The applicant team’s response Approaches the expectations for this section.

Concerns for this section are noted as follows:

- The applicant team’s narrative did not mention that the head administrator would need a L3-B Administrator's license, however this requirement is in the job description provided in the appendices.
- The narrative does not describe how the hiring process is equitable.

- The applicant team’s narrative gives a complete description of initial hiring and hiring when the Head of School gives a year's notice to leave (30 days are required per contract). The narrative also states that an interim assignment would be given to another staff member in case the Head of school leaves with less than a year's notice. However, if there is no other qualified member of staff to take the interim assignment. No process/timeline is outlined for hiring the replacement staff.
- In the onboarding section the school head is responsible to read the charter and understand it, but there is no mention of monitoring charter compliance.

<b>C.(3)</b>	<b><u>Distinguished Roles &amp; Responsibilities</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>• Identify the process the governing body will use for distinguishing their roles and responsibilities with those of the head administrator;</li> <li>• Include specific actions the governing body will take to ensure the head administrator understands the obligations of the charter contract, the boards’ role in oversight and chartering, and the requirements of all elements of the plan contained in this application; and</li> <li>• Attach a job description in <b>Appendix B</b> that includes the following: <ul style="list-style-type: none"> <li>○ Lists all major responsibilities of the head administrator</li> <li>○ Includes responsibilities that are unique to charter school leaders</li> <li>○ Includes responsibilities that specifically relate to the school’s mission, goals, and educational philosophy</li> <li>○ Identifies all hiring requirements including all previously identified requirements related to characteristics and qualifications.</li> </ul> </li> </ul>

The applicant team’s response Approaches the expectations for this section.

A job description for the Head of School is attached as Appendix B.

The job description is missing a section regarding the responsibilities unique to charter school leaders such as ensuring that all aspects of the charter are incorporated into the operation of the school and monitoring and adjusting procedures, policy and goals to meet the charter commitment. The job description and narrative are also missing important responsibilities such as being the custodian of all cash and property, facilities, maintenance and risk management and overseeing procurement which is a huge and unique part of being a head administrator of a charter school operation and acting in a superintendent role.

<b>C.(4)</b>	<b><u>Head Administrator Evaluation Plan</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify the plan for annually evaluating the head administrator, including action steps, timelines, responsible parties, and standards or criteria including how this will be maintained in the boards’ annual calendar process;</li> <li>● Include action steps to evaluate the effectiveness of the head administrator</li> <li>● Describe how the plan specifically takes into account ensuring the equitable implementation of the mission and goals of the proposed school; and</li> <li>● Ensure the plan meets the requirements identified in NMAC 6.69.7.8 and 6.69.7.9.</li> </ul>
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The applicant team’s response Approaches the expectations for this section.

The applicant team’s narrative response for this section lacks specificity regarding action steps to evaluate the effectiveness of the Head of School and how the plan specifically takes into account ensuring the equitable implementation of the mission and goals of the proposed school. The applicant team states they will use NMAC 6.69.7 Evaluating Principals and Assistant Principals.

**D. Organizational Structure of the Proposed School**

<b>D.(1)</b>	<b><u>Organizational Chart</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Meets</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Include an organizational chart for each year as part of the rollout with grade additions;</li> <li>● Show how the Equity Council is incorporated into to organizational chart;</li> <li>● Include a narrative that describes the structures and relationships represented in the organizational chart;</li> <li>● Include all entities essential to the operation and success of the proposed school; and</li> <li>● Describe the relationship among each of the relevant entities.</li> </ul>

The applicant team’s response Meets the expectations for this section.

<b>D.(2)</b>	<b><u>Job Descriptions for Certified/Licensed Staff</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Meets</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify the following: <ul style="list-style-type: none"> <li>○ all certified and licensed staff identified in the application</li> <li>○ all non-certified or unlicensed staff identified in the application who could be considered essential to the operation and success of the proposed school</li> <li>○ any non-traditional roles or positions;</li> </ul> </li> <li>● Describe why the identified roles are key to the operation and success of the proposed school; and</li> <li>● Attach staff job descriptions as <b>Appendix C</b> for all of the positions identified in the application response and include the following: <ul style="list-style-type: none"> <li>○ List all major responsibilities of the positions</li> <li>○ Include responsibilities that specifically relate to the school’s mission, goals, and educational philosophy</li> <li>○ Identify all hiring requirements including qualifications and licensure or certification</li> <li>○ Identify reporting lines (“reports to”) that align to the organizational chart.</li> </ul> </li> </ul>
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The applicant team’s response Meets the expectations for this section.

<b>D.(3)</b>	<b><u>Staffing Needs and Plan</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify an ongoing staffing plan and process for hiring all necessary staff, both for the initial hiring and for any time a position becomes vacant, include action steps, timelines, responsible parties;</li> <li>● Describe how the staffing plan and process will ensure the school is able to hire highly qualified staff, no later than two weeks prior to the start of the proposed school year, on an annual basis, and fill all vacancies within a reasonable time; include how the school will recruit and hire highly-qualified licensed staff;</li> <li>● Describe how the staffing plan and process is reasonable and adequate to support effective and timely implementation of the academic program/curriculum during the planning year and for all subsequent years;</li> <li>● Describe how the staffing plan and process is aligned with the budget and the school’s projected enrollment; and</li> <li>● Describe how the school will make adjustments to the staffing plan in the case that there are differences in projected and actual enrollment.</li> </ul>
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The applicant team’s response Does Not Meet the expectations for this section.

Concerns are noted as follows:

- A Board committee cannot participate with the Head of School in hiring. The Board can only hire the Head of School.
- On page 5 of the application, the charter writer does note that the Waldorf trained teachers from the private school will need PED licensure if they are to be hired by the school and has



plans to support those teachers to receive the license during its implementation year. See the budget section for an analysis of Figure 42, the FTE chart of faculty and staff vs the budget

- Considering the special education director is to oversee special education and EL students, 0.5 FTE for the first two years seems inadequate.
- The Board should have NO part in hiring faculty and staff. The response has the board heavily involved, including collecting applications to present to the Head of School and being part of interviews. This is not an allowable practice.
- The narrative does not describe how the staffing plan and process is reasonable and adequate to support effective and timely implementation of the academic program.

D.(4)	<u>Professional Development Plan</u>
Rating	Expectations
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify an annual professional development plan with action steps, timelines, responsible parties, and associated costs               <ul style="list-style-type: none"> <li>○ Describe how the plan meets state requirements and rules; and</li> <li>○ Describe how the school will ensure professional development time is not used for routine staff meetings.</li> </ul> </li> <li>● Identify a mentorship plan for novice teachers, including action steps, timelines, responsible parties, and associated costs that meets the requirements of PED rules; and</li> <li>● Describe how the annual professional development plan and the mentorship plan for novice teachers ensure the following occur:               <ul style="list-style-type: none"> <li>○ are supported by the budget</li> <li>○ support the implementation of the proposed school’s educational plan, mission, and performance goals</li> <li>○ not only address required annual training, but are also tailored to address school- and teacher-specific professional development needs.</li> </ul> </li> </ul>

The applicant team’s response Approaches the expectations for this section.

Concerns are noted as follows:

- The charter application states: " A teachers’ training certificate is, on average, about \$17,000 over 3-4 years, depending on the program. A teacher can contribute that money to cover his/her training cost and then will be required to pay any costs over \$500". This is a large commitment for a teacher who will be earning approximately \$50,000 per year with a take home of about 60% of that.
- In year 1, \$1,750 is budgeted for Professional Development for teachers and nothing in years 2-5. Title II money is mentioned; however, it wouldn’t be sufficient to cover the costs.
- The charter narrative states: "The yearly budget includes a line-item equivalent to \$500 per teacher per summer to dedicate to teachers’ summer training." The \$500 per teacher is not reflected in the budget.

- The Head of School should be attending all Equity Council meetings, not three a year.
- No budget is provided for Mentorship in operation years 1 and 2.

## E. Employees

E.	<u>Employer/Employee Terms</u>
Rating	Expectations
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify all primary classes of employees the school will employ (e.g., administrative, professional, term, contract);</li> <li>● Include an employment policy and handbook</li> <li>● Provide an explanation for onboarding new staff and re-training returning staff on the terms within the handbook and policy.</li> <li>● Explain how the school, through the governing body and head administrator, will address employee unions and other school-specific employee representatives.</li> </ul>

The applicant team’s response Approaches the expectations for this section.

Concerns are noted as follows:

- An explanation for onboarding new staff and re-training returning staff on the terms within the handbook and policy is not provided.
- The Employee Handbook is not within the application but is a separate attachment.
- No explanation is provided for onboarding new staff and re-training returning staff on the handbook and policy.
- No salary schedules are included for the Head of School, the Pedagogical Director, the SPED Director or the Operations Director; only starting salaries are listed in the application. PED requires salary schedules for all employees to be submitted with budgets and they verify those schedules to the actual budget.
- Salaries that are stipulated in this section of the application for the Head of School are less than what is budgeted for in years 1 - 5.
- In the handbook, mandatory deductions in Medicare and Retiree Healthcare should also be included.

## F. Community/Parent/Employee Involvement in Governance

F.(1)	<u>Parental, Professional Educator, and Community Involvement in Governance Plan</u>
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Rating	Expectations
<b>Meets</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify school operation and governance structures that will provide the following: <ul style="list-style-type: none"> <li>○ A meaningful opportunity for parental input and participation</li> <li>○ A meaningful opportunity for professional educator input and participation</li> <li>○ A meaningful opportunity for community input and participation;</li> </ul> </li> <li>● Describe how the structures will facilitate parental involvement that will help advance the proposed school’s mission;</li> <li>● Explain the role of the Equity Council in the governance and operation of the proposed school;</li> <li>● Include assurances that the school understands it may not require family or parental support or involvement as grounds for accepting, not accepting, enrolling, dis-enrolling, or otherwise differentiating treatment of a student; and</li> <li>● If the school plans to offer opportunities for parent support, explain the process of opting out for parents who are unwilling or unable to meet the proposed school’s support opportunities.</li> </ul>

The applicant team’s response Meets the expectations for this section.

F.(2)	<u>Plan for Processing Concerns and Complaints</u>
Rating	Expectations
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify a grievance process to receive and process concerns and complaints from the community, parents and families, and students that includes action steps, timelines, and responsible parties;</li> <li>● Include a final step in the process that provides the grievant a meaningful opportunity to be heard by, and receive a response from, the governing body; if they are unable to obtain resolution from the head administrator;</li> <li>● Describe how the process is transparent, fair, accessible to the community, and ensure a timely and meaningful response; and</li> <li>● describe how the school will provide assurances that the school will additionally meet the specific legal requirements of the McKinney Vento and special education grievance processes.</li> </ul>

The applicant team’s response Approaches the expectations for this section.

Concerns for this section are noted as follows:

- The Head of School is left out of the grievance process unless the complaint is about the Operations Director or Pedagogical Director.
- How the grievance process is fair, transparent, and accessible is not fully addressed.
- The McKinney Vento and Special Education grievance policies do little more than state that NMAC will be followed.

- Written complaints regarding harassment, discrimination, etc., are to be addressed to the Operations Director who will not be a full-time employee until the 4th year of the charter.
- Written complaints regarding faculty members are directed to the Pedagogical Director who will not be on staff full-time until year 3.
- There is no mention in the employee handbook of who performs those functions prior to years 3 and 4 when the assigned staff will be onboard.

## **G. Student Recruitment and Enrollment**

<b>G.(1)</b>	<b><u>Outreach &amp; Recruitment Plan</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>• Identify a prospective student outreach and recruitment plan, including action steps, timelines, responsible parties, and associated costs;</li> <li>• Describe: <ul style="list-style-type: none"> <li>○ how the plan is tailored to ensure equal access to the school</li> <li>○ why the plan is likely to attract a student body that is demographically reflective of the local community and school district;</li> <li>○ provide a description of how the school will change recruitment plans and outreach if projected student enrollment is not reached</li> </ul> </li> <li>• Describe how the school will annually evaluate the effectiveness of the outreach and recruitment efforts in ensuring equal access to the school and attracting a student body that is demographically reflective of the local community and school district and how the school will use that information to make adjustments to the outreach and recruitment plan.</li> </ul>

The applicant team's response Approaches the expectations for this section.

The applicant states: " Informed by other start-up, high performing charter schools, SMCS has budgeted a lump sum of \$5000 for recruitment costs in the Implementation Year, and \$20 per new student each year for recruitment costs in subsequent years. A majority of the associated cost for Implementation Year recruitment will be for preparation and printing of promotional materials and print advertising. The Implementation Year costs will be budgeted out of the Charter Schools Program (CSP) grant (federal funding grant dedicated to support the creation, expansion and replication of public charter schools)." The applicant was informed during the training that this grant is no longer available. There is no room in the current budget, which is in a deficit position, to absorb this cost.

<b>G.(2)</b>	<b><u>Lottery Admission Process</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify a plan to implement a lottery admission process if necessary, include action steps, timelines, and responsible parties;</li> <li>● Describe each of the steps of the process to include the following: <ul style="list-style-type: none"> <li>○ Pre-lottery entry</li> <li>○ Lottery</li> <li>○ Post-lottery registration</li> <li>○ Waitlist maintenance and entry; and</li> </ul> </li> <li>● Describe how the lottery process supports equal access to the school.</li> </ul>
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The applicant team’s response Approaches the expectations for this section.

Concerns noted as follows:

The applicants did not describe how the lottery process supports equal access to the school.

Post lottery registration is not addressed.

How the lottery process supports equal access is not addressed.

**H. Legal Compliance**

<b>H.</b>	<b><u>Conflict of Interest Policy</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Provide a governing body conflict of interest policy that includes action steps, timelines, and responsible parties;</li> <li>● Describe how the policy meets the requirements of New Mexico law addressing all areas of potential conflicts of interest; and</li> <li>● Include all forms the governing body will or may be required to submit pursuant to the policy.</li> </ul>

The applicant team’s response Approaches the expectations for this section.

The applicant team did not fully address the expectations for the Conflict-of-Interest Policy within this section of the application. The applicant referred the reviewer to Attachment 25. There is no evidence of forms that the governing body will or may be required to submit pursuant to the policy.

**I. Evidence of Partnership/Contractor relationship (if applicable)**

<b>I.(1)</b>	<b><u>Essential Third Party Relationships</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>N/A</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify any third party relationships with specific, identified organizations that control or influence essential elements—including the existence, operation, curriculum, or instruction of the proposed charter school—that are required by a partner organization or any part of the application;</li> <li>● Describe, in detail, the relationships;</li> <li>● Describe why the relationships are essential or required, or how they control essential elements of the proposed charter school;</li> <li>● If any such relationships exist identify the following: <ul style="list-style-type: none"> <li>○ The specific, identified organizations</li> <li>○ Contact information for that organization</li> <li>○ Specific individuals in the organization that will be associated with the proposed school;</li> </ul> </li> <li>● Describe all legal implications of the essential/required relationships, including the legal benefits and responsibilities of each party.</li> </ul>
NOT APPLICABLE.	

<b>I.(2)</b>	<b><u>Appendix D Attachment Formal Agreement Documentation</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>N/A</b>	<p>A response is only required if relationships were identified in questions I.(1)</p> <p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify all MOUs or formal agreements that are attached in <b>Appendix D</b>;</li> <li>● Include proposed formal agreements or MOUs that are signed in <b>Appendix D</b>; and</li> <li>● Identify the responsibilities, activities, and costs of both sides.</li> </ul>
NOT APPLICABLE	

**J. Transportation and Food**

<b>J.(1)</b>	<b><u>Transportation Plan</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Approaches</b>	<p>A response is only required if the school plans to offer regular transportation either for daily transportation to/from school OR for transportation to/from school specific activities and events that are a necessary part of the mission. All schools must be prepared to meet IEP transportation requirements.</p> <p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify a plan for establishing transportation services at the school including specific action steps, timelines responsible parties, and associated costs that address the following: <ul style="list-style-type: none"> <li>○ Identifying equipment purchase or contracting needs</li> <li>○ Identifying hiring and or contracting needs</li> <li>○ Hiring or contracting</li> <li>○ Establishing training needs and inspection process needs</li> <li>○ Establishing travel routes and pick up/drop off points</li> <li>○ Establishing transportation policies and practices</li> <li>○ Identifying student transportation needs; transportation plan costs; and</li> </ul> </li> <li>● Identify all, but at least one, specific entities or organizations that have been identified as potential partners or vendors for these services</li> </ul>
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The applicant team’s response Approaches the expectations for this section.

The applicant team provided a transportation plan. A budget is included in fund 13000 for years 2-5. However, the expenditures far exceed the estimated revenue from the State. The exceeded expenditures cannot be absorbed into the operating fund (and there is nothing budgeted there) because in all but one year their expenditures already exceed revenue in the operating fund.

Additionally, the applicant states: "Sun Mountain Community School will apply for CSP funding for daily to-and-from school ridership transportation funding in the first year, before NMPED begins transportation allocations in year two. In year two, we will budget \$600 per student riding the bus to pay for the \$60,000 contract." CSP funding is not available and although the applicant has inserted a budget in fund 24146 (CSP), it is not an amount equivalent to the cost of buses.

<b>J.(2)</b>	<b><u>Food Services Plan</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify a plan for establishing food services at the school, including specific action steps, timelines responsible parties, and associated costs that address the following: <ul style="list-style-type: none"> <li>○ Identifying equipment purchase or contracting needs</li> <li>○ Identifying hiring and/or contracting needs</li> <li>○ Hiring or contracting</li> <li>○ Establishing training and inspection process needs</li> <li>○ Identifying and completing relevant program application and reporting requirements;</li> </ul> </li> <li>● Identify all federal and state food service programs the school plans to participate in;</li> <li>● If providing or planning to offer a PreK or Early Childhood program, provide a plan for food service;</li> <li>● Identify how the school will fund the food service plan costs prior to receiving any applicable reimbursements; and</li> <li>● Identify all, but at least one, specific entities or organizations that have been identified as potential partners or vendors for these services and describe all steps that have been taken to create a relationship, establish a relationship, or develop a partnership to provide these services.</li> </ul>
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The applicant team’s response Approaches the expectations for this section.

The school does not identify how it will fund food services until reimbursements are made and the funding for food services in year 1 is not included in their operational budget. All other expectations are addressed in the narrative.

**K. Facilities/School Environment**

<b>K.(1)</b>	<b><u>Appendix E Attachment: Facilities Master Plan Ed/ Spec Checklist</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Meets</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Demonstrate the applicant submitted a Facilities Master Plan to PSFA by the deadline;</li> <li>● If offering or planning or offer a PreK or Early Childhood program, provide a description of the facilities and playground in the Facilities Master Plan; and</li> <li>● Demonstrate the PSFA has approved the applicant’s Facilities Master Plan.</li> </ul>

The applicant team’s response Meets the expectations for this section.

<b>K.(2)</b>	<b><u>Evidence of Researched Facilities/Properties</u></b>
<b>Rating</b>	<b>Expectations</b>



<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Demonstrate the applicant has done the following: <ul style="list-style-type: none"> <li>○ Conducted outreach and researched multiple facilities or properties in the targeted geographic location to understand if there are public facilities that are available, appropriate, and viable</li> <li>○ Identified whether or not each potential property will meet the requirements of NMSA 1978 § 22-8B-4.2, including occupancy, adequacy, and ownership;</li> </ul> </li> <li>● Identify at least one potential facility or property that meets requirements.</li> <li>● Identify a plan that would enable the applicant to prepare the facility/property to meet the facility needs of the proposed school in time for the proposed school’s opening date, include specific action steps, timelines, responsible parties, and capital outlay needs;</li> <li>● Identify how the project to prepare the facility will be funded.</li> </ul>
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The applicant team’s response Approaches the expectations for this section.

On page 17 of the application, the applicant team states: "SFWS is no longer operating, but it continues to own the campus SMCS plans to occupy. After application approval, SMCS intends to secure a lease between SMCS and SFWS for use of the campus and to formally propose to SFWS’s board that SFWS become a supporting organization for SMCS." This does not address the fact that SMCS needs to be in a public facility. In the attached Appendices for facilities, the applicant stated they did not anticipate needing a capital improvement plan. The applicants did not research any other facilities as required by the expectations for this section.

### III. Financial Framework

#### A. School Size

A.	<u>Projected Enrollment</u>
Rating	Expectations
<b>Meets</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify the anticipated number of students for each of the first five years and “at capacity”, based on the long-term strategic plan;</li> <li>● Identify the grade levels requested to be served in each of the first five years (phase in plan) and “at capacity”, based on the long term strategic plan; and</li> <li>● Identify the student/teacher ratio (not student/staff ratio) that aligns with the number of students served, grade levels, and staffing plan for each of the first five years and “at capacity”, based on the long term strategic plan.</li> </ul>

The applicant team’s response Meets the expectations for this section.

## B. Budgets

<b>B.(1)</b>	<b><u>Attached Appendix F, 910B5 State Equalization Guarantee (SEG)</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Include a complete 910B5 Worksheet in <b>Appendix F</b>;</li> <li>● Use appropriate values and computations in each year;</li> <li>● Use projected unit value; and</li> <li>● Budget the correct special education percentage based on the local special education population, unless the school has a sufficient justification for why it will have a larger population (provide justification, if applicable).</li> </ul>

The applicant team's response Does Not Meet the expectations for this section.

Analysis of Sun Mountain Community School's Appendix F, 910B5 SEG:

- In the 910B-5's year 1 there were no entries for special education students in year 1, but there were ancillary units.
- The number of special education students on the 910B-5 was different from the number on the Figure 33 table.
- The number of ancillary service units was too large for the number of special education students.
- The applicant used 18% for their special education student count, but the average in district is about 15%. Applicants were directed to use 15%.
- The number of students on the 910B-5 was smaller than on the Figure 33 table for years 1, 2 and 3.
- The applicant did not budget for Elementary PE; that line item is now allowed.
- The applicant used the FY24 unit value, which is \$200/unit lower than the correct unit value for FY25.
- The applicant apparently chose not to factor in an increase in the unit value for years 2-5. This is neither positive nor negative for our review purposes.
- On the worksheets, the applicant should have estimated their prior year 80-120 and then added the additional students under growth. It appears they put their anticipated growth under the 80/120 total student count.
- Applicant used an accurate FY24 At Risk Index.

<b>B.(2)</b>	<b><u>Attached Appendix G: Proposed five-year Budget Plan</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Include a five-year budget plan in <b>Appendix G</b> that is based on the 910B5 SEG Revenue Worksheet from Appendix F;</li> <li>● Support the proposed school's mission and all elements of the proposed program laid out in the application; and</li> <li>● Align with the proposed school's five-year growth plan.</li> </ul>

The applicant team's response Does Not Meet the expectations for this section.

Analysis of Sun Mountain Community School's Appendix G, Proposed Five-Year Budget Plan:

- In the budget expenditures the applicant used non-existent job codes for teachers (1417 and 1418)
- Teacher salaries are budgeted at minimum first year for L1 (\$50,000) and L2 (\$60,000). This appears to be an under budgeted line item that also affects benefits.
- Did not budget for special ed teachers (1412) but put something in Contracted under student support.
- Has a budget for a SPED Director.
- No budget for gifted teachers, but there are gifted teachers noted in Figure 33 table.
- Did not budget for any special ed services except for an interventionist (see the 1412 comment above) and a contracted psychologist.
- The Head of School was budgeted in the wrong area, under 2400. Should be 2300.
- Many of the FTEs in the budget were different from the table provided in the charter narrative.
- With teachers the applicant had 21 total FTEs for teachers in years 3-5 in the table but only 9 total FTEs in the budget.
- Some FTEs in the table were not budgeted.
- Contract business manager was budgeted in the wrong function (2300 should be 2500).
- There was a budget under this job code (1115), as an Operations Director, but not until year 3.
- They did not budget for property and liability insurance.
- No budget in function 2200: Testing, Library and Technology go here.
- Probably did not budget enough for instructional materials.
- In years 1, 3, 4, 5 the expenditures exceed revenue in operational.
- For year 2, the net revenue (Rev - Exp) was only 5,000 so could not support the over budget in any of the years.
- The applicant budgeted carryover cash, but all but year 2 had deficit spending so there would be no carryover cash.
- In all years, expenditures exceed revenue, and with a deficit already existing in operational, the deficit could not be transferred to operational.
- There was a budget in years 1 and 2 for obsolete fund 24146.
- There were expenditures in years 1 and 2 for fund 24153, but no revenue.
- Figure 33 table: FTEs for Special ed staffing were more than what was in the budget except for the special ed director.

**B.(3)**

**Budget Narrative**

Rating	Expectations
<b>Does Not Meet</b>	A complete response must <ul style="list-style-type: none"> <li>● Explain basic assumptions;</li> <li>● Identify reliable sources for each assumption;</li> <li>● Include priorities consistent with the proposed school’s mission;</li> <li>● Include priorities consistent with the proposed school’s educational program;</li> <li>● Include priorities consistent with the proposed school’s staffing; and</li> <li>● Include priorities consistent with the proposed school’s facility.</li> </ul>

The applicant team’s response Does Not Meet the expectations for this section.

Analysis of Sun Mountain Community School’s Budget Narrative:

- The applicant did not budget 100% of expected enrollment.
- The 910B-5's reflect an expected percentage of their hoped-for enrollment for each year.
- Since the applicant used the conservative percentages for enrollment on the 910B-5's, perhaps they should have reflected the fewer number of teachers that will be needed (student: teacher ratio) in the budget to create a balanced budget instead of a budget in an overdrawn state.

B. (4)	<u>Budget Adjustments</u>
Rating	Expectations
<b>Does Not Meet</b>	A complete response must <ul style="list-style-type: none"> <li>● Describe budget control strategies <b>as well as</b> budget adjustments that will be made to meet financial budget and cash-flow challenges;</li> <li>● Describe budget control strategies <b>as well as</b> budget adjustments that will be made to address the failure to receive any anticipated funding sources;</li> <li>● Include explanations that are viable and realistic, based on the professional judgment of experienced, licensed, school business officials;</li> <li>● Address how special education students will receive services <b>before</b> special education funding is provided, based on accurate 40-day counts; and</li> <li>● Address how gaps between budgeted students and actual enrollment will be addressed.</li> <li>● Demonstrate how budget control strategies provide <b>capacity</b> to manage the budget successfully.</li> <li>● Address how the school will modify the budget for students with special needs.</li> <li>● describe how the proposed school will address the budget in the event that the proposed school has budgeted for more students, based on early enrollment, than actually enroll in the proposed school at the beginning of the proposed school year.</li> </ul>

The applicant team’s response Does Not Meet the expectations for this section.

Concerns for this section are noted below:

No budget control strategies are described if anticipated funding is not received. The school proposes consolidating faculty and staff positions. Explanations that are viable and realistic, based on the professional judgment of experienced, licensed, school business officials were not included. The budget narrative regarding special education services does not seem to align with the budget for special education staff presented in the budget plan. It is unclear where funding for these positions will come from. The response does not actually answer how gaps between budgeted students and actual enrollment will be addressed. The narrative does not demonstrate how budget control strategies provide capacity to manage the budget successfully.

In summary, the applicant team used a conservative estimate of students on their 910B-5's, but did not lower expected staff costs. The applicant stated lowering staff costs as a savings, but the school is already overspent as noted in other areas of this document, so this isn't viable for cost savings. The applicant offered no other cost savings.

**C. Financial Policies, Oversight, Compliance, and Sustainability**

C.(1)	<u>Internal Control Procedures</u>
Rating	Expectations
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify all the internal control procedures that have been attached in <b>Appendix H</b>;</li> <li>● Attach in <b>Appendix H</b> internal control procedures the proposed school will utilize to assure the following:               <ul style="list-style-type: none"> <li>○ safeguard assets</li> <li>○ segregate its payroll</li> <li>○ segregate cash and check disbursement duties</li> <li>○ provide reliable financial information and promote operational efficiency</li> <li>○ ensure compliance with all applicable federal and state statutes, regulations, and rules;</li> </ul> </li> <li>● Attach procedures that—based on the professional judgment of experienced, licensed, school business officials—successfully ensure appropriate segregation of duties; and</li> <li>● Provide a process the school will use to regularly evaluate compliance with the internal control procedures that have been attached in <b>Appendix H</b> and other internal control procedures that will be developed and implemented by the school.</li> </ul>

The applicant team’s response Does Not Meet the expectations for this section.

The following concerns are noted:

- A process to evaluate compliance with internal control procedures is not provided.
- Appendix H is the school's proposed financial policies and procedures rather than internal control procedures.
- There is nothing that assures the safeguard of assets, segregation of payroll, etc.

<b>C.(2)</b>	<b><u>Staff for Financial Tasks</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify the appropriate staff to perform each financial task identified in the response to B(1) and all other required financial tasks;</li> <li>● Align completely with the organizational chart from response to D(1) in the Organizational Framework;</li> <li>● Align completely with the budget in A(1) and A(2) responses in Financial Framework;</li> <li>● Describe appropriate qualifications and responsibilities for each of the identified positions; and</li> <li>● Include a plan that will result in the recruitment, identification, the evaluation of candidates, and the hiring of highly qualified staff for each of the identified positions, no later than two weeks prior to the start of the proposed school year.</li> </ul>

The applicant team’s response Approaches the expectations for this section.

The following concerns are noted:

- No plan is given for the hiring of financial staff.
- No indication of the Head of School’s role in financial oversight.
- The budget does not support an operations manager of a .5 FTE in year 3 or 1.0 FTE for years 4 & 5 in salaries for business manager function 2500 51100 1115 nor the benefits relating to this salary.
- In year 1 the budget only supports an FTE of .45 for the office administrator when the staffing plan requires an FTE of .75.
- There is no plan identified for the identification, evaluation and hiring of the highly qualified staff for each of these positions, no later than two weeks prior to the start of the proposed school year.

<b>C.(3)</b>	<b><u>Governing Body Legal &amp; Fiscal Oversight</u></b>
<b>Rating</b>	<b>Expectations</b>

<b>Approaches</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Describe how the Governing Body audit and finance committees will be formed and how they will: <ul style="list-style-type: none"> <li>○ Function generally</li> <li>○ Ensure proper legal oversight</li> <li>○ Ensure proper financial oversight;</li> </ul> </li> <li>● Describe how the proposed school’s audit and finance committees will interact with the school’s management; and</li> <li>● Describe how the audit and finance committees will interact with the full Governing Body.</li> </ul>
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The applicant team’s response Approaches the expectations for this section.

The following concerns are noted:

- The applicant team stated that there would be an Operations Coordinator and Operations Director. However, there is no budget for an Operations Coordinator.
- The applicant states: "The Audit Committee will consist of a majority of members who are not also members of the Finance Committee". Action needs to be taken on this concern.
- The response lacks detail. For example, it simply states the Finance Committee will meet at regular intervals.

## IV. Evidence of Support

### A. Outreach Activities

<b>A.</b>	<b><u>Outreach Program</u></b>
<b>Rating</b>	<b>Expectations</b>
<b>Meets</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Describe an outreach program to develop community support for the proposed school that has been implemented during the application process;</li> <li>● Describe specific activities that have been implemented, include evidence of implementation;</li> <li>● Include evidence that demonstrates the activities reached a broad audience that is representative of the community in which the proposed school will be located; and</li> <li>● Describe how this outreach has enabled the applicant team to understand the needs of the community in which the proposed school intends to locate.</li> </ul>

The applicant team’s response Meets the expectations for this section.

### B. Community Support

<b>B.</b>	<b><u>Evidence of Community Support</u></b>
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Rating	Expectations
<b>Does Not Meet</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Include quantitative data that demonstrates community support from a broad audience for this proposed school;</li> <li>● Include qualitative data that demonstrates community support from a broad audience for this proposed school;</li> <li>● Include descriptions of the anticipated demographics of the students who will be served by the proposed school, disaggregate the number of prospective students by zip code, school of attendance (current), gender, type of current school (home, private, public), or other pertinent data.</li> <li>● Ensure the demonstrated support includes support within the community of the specific targeted geographic location; and</li> <li>● Describe why the applicant team believes the evidence demonstrates the school will be embraced and supported as the community’s school and that there is abundant support for this school as a part of the community.</li> </ul>

The applicant team’s response Does Not Meet the expectations for this section.

The applicant team has had numerous outreach activities and have had small numbers of persons at each activity showing support for a Waldorf school. Responses showing support totaled less than 300. Support appears to be primarily from the community previously involved with the school that closed. Broad support has not been demonstrated.

**C. Community Relationships**

C.	<b><u>Networking with Community</u></b>
Rating	Expectations
<b>Meets</b>	<p>A complete response must</p> <ul style="list-style-type: none"> <li>● Identify and describe specific meaningful and strategic networking relationships with local community agencies, groups, or individuals that will support the school. Include evidence of these relationships.</li> <li>● Identify and describe specific meaningful and strategic resource agreements with local community agencies, groups, or individuals that will support the school. Include evidence of these relationships; and</li> <li>● Describe why the applicant team believes the identified relationships demonstrate the school will be embraced and supported as the community’s school and that there is abundant support for this school as a part of the community.</li> </ul>

The applicant team’s response Meets the expectations for this section.



## **D. Capacity Interview**

<b>1.</b>	<b>What is the most important contribution your proposed school will bring to public education in the community in which you propose to operate? How will this contribution be essential to the success of the proposed school?</b>
<b>Does not meet</b>	<b>Independent Review Team Comments:</b> The applicant team did not specifically address the most important contribution the proposed school will bring to public education and how this contribution will be essential to the success of the proposed school.
<b>2.</b>	<b>How will you evaluate whether your mission and implementation of it are working?</b>
<b>Does not meet</b>	<b>Independent Review Team Comments:</b> The applicant team did not specifically address how they would evaluate whether the mission and implementation of it are working. The response focused on formative classroom assessments aligned to core curriculum standards, SEL surveys and attendance as well as teaching to the head, hearts and hands of each child. The response did not include how they would evaluate the larger picture of the mission and its implementation.

<b>3.</b>	<b>What role does a governing body play in the success of a charter school? Describe your strategic process for identifying and selecting members. How will this process support the success of your proposed school?</b>
<b>Approaches</b>	<b>Independent Review Team Comments:</b> The applicant team’s response generally addressed the role the governing body would play in the success of a charter school and included an informal process to identify and select members. The response did not, however, reflect a strategic process that could be applied consistently to identify and select members. The response also did not specifically address how the process would support the success of the proposed school.
<b>4.</b>	<b>What role does the school leader play in the success of a charter school? Describe your strategic process for identifying and selecting her/him. How will this process support the success of your proposed school?</b>
<b>Approaches</b>	<b>Independent Review Team Comments:</b> Although a strategic process for identifying and selecting the school leader was described, the role the school leader plays in the success of a charter school was not addressed. NOTE: During the interview process, the role of the school leader became unclear. The applicant group stated that the Head of School works in collaboration with other school departments and leadership, including the leadership team, which is the special education director and the pedagogical

	director. The school leader’s role is to hire, evaluate, and fire all employees of the school. Clarification is needed.
<b>5.</b>	<b>How does a high-quality process to evaluate the effectiveness of the governing body and the school contribute to the success of a charter school? Describe your strategic process for conducting these evaluations. How will these processes support the success of your proposed school?</b>
<b>Does not meet</b>	<b>Independent Review Team Comments:</b> The applicant team did not clearly address the questions stated above. A description of an unconventional evaluation process was described. Self-evaluation and self-reflection play a role in the overall evaluation process. Although the Board will in part be evaluated by 5 community subgroups and the Head of School will be evaluated by the Board, the applicant group indicated that teacher evaluations will be conducted in part by the Pedagogical Director and Elevate New Mexico. The role of the Head of School in evaluation of teachers and other staff remains unclear.
<b>6.</b>	<b>Please explain the delineated roles and responsibilities of, and the relationships between, the founders, the governing body, and the proposed school’s administration during the transitional period between the planning/implementation year and the first year of operations. Describe how those relationships evolve to ensure the success of the charter school.</b>
<b>Does not meet</b>	<b>Independent Review Team Comments:</b> The applicant team’s response was incomplete. Some roles during the transitional period were described; however, the descriptions did not include how the relationships would evolve to ensure the success of the charter school.
<b>7.</b>	<b>Explain the importance of by-laws and policies to the success of a charter school. Describe the strategic processes the proposed school will use to establish, implement and update them and how these will contribute to the success of the proposed school.</b>
<b>Approaches</b>	<b>Independent Review Team Comments:</b> The proposed school’s legal expert wrote proposed by-laws, apparently from scratch. During the interview, the legal expert indicated that she feels that they have a really good start on proposed bylaws and policies that are both legally compliant and mission aligned.
<b>8.</b>	<b>How will the proposed school ensure that policies and procedures are not only compliant, but also well implemented, current, and effective? How will the proposed school determine when they are in need of change and how will it react?</b>
<b>Does not meet</b>	<b>Independent Review Team Comments:</b> The applicant team responded with an unusually strong focus on everyone knowing all school policies. Stated during the interview: “This culture will include a commitment to introducing policies in an effective and timely manner and to review them regularly.” The response also included the following statement: “The first step is to make sure that the policy for whom it is written understands what the policy is, and that they understand that the policy is written for their good

	and, more importantly, for the good of the school. NOTE: Because policies are being written specifically to be mission-aligned, the independent review team suggests that the legal council review all policies before implementation.
9.	<b>Describe your plan for acquiring a facility and ensuring that the facility meets educational occupancy standards required by applicable New Mexico construction codes and the weighted New Mexico Condition Index. Whose responsibility will it be to carry out this major piece of opening a charter school? Please include details about locating, securing, and funding the facility.</b>
<b>Approaches</b>	<b>Independent Review Team Comments:</b> The applicant team indicated that it was their understanding that once a lease agreement is signed, they can reach out to PSFA to conduct a campus visit for a weighted New Mexico Condition Index rating. Typically, a school reaches out to PSFA prior to signing and lease.
10.	<b>If you cannot find a building that meets the need of the plan described in the PSFA (Public School Facilities Authority) approval, what is your next steps plan?</b>
<b>Does not meet</b>	<b>Independent Review Team Comments:</b> The applicant team indicated that they are confident that they have found their facility and do not wish to dilute their efforts trying to find an alternate facility. If this plan falls through, they will work with the realtor to find an alternate facility. This response was rated as “Does Not Meet” because the team hasn’t developed a clear “next steps plan” should the current facility become unavailable.
11.	<b>How are you going to open your proposed school without federal start-up funds? Does the proposed school have a plan to supplement its budget in some way? Does the proposed school have a plan to acquire funding necessary to accomplish planning/implementation year requirements (setting up a bank account, acquiring furniture, having software systems in place to interface with PED’s OBMS system, etc.)?</b>
<b>Approaches</b>	<b>Independent Review Team Comments:</b> The applicant team indicated that the application and budget were written as if they would not receive a CSP grant. They indicated that they will apply to Waldorf-specific foundations and other organizations for potential seed funding. The applicant team described several options that might be available. However, a specific plan was not described.
12.	<b>In detail describe how you will make enrollment projections to establish and submit your first budget to PED? How will you ensure these enrollment projections are reasonable and align closely to your actual 40-day count?</b>
<b>Approaches</b>	<b>Independent Review Team Comments:</b> The applicant team used conservative enrollment projections (75%). However, they are counting on “numerous Waldorf students with an expressed interest in returning to a Waldorf-inspired school.

13.	<b>Suppose your actual enrollment on the first day is 50% below your pre-opening “enrollments” and 70% below your projections used to submit your budget. What are the implications for your budget/business plan and what are your next steps? Describe in detail what actions you would take and when you would take them to address this situation.</b>
Does not meet	<b>Independent Review Team Comments:</b> Although the applicant team described phasing staff hiring into tiers to bring on essential staff first and other plans, the response did not describe in detail what specific actions would be taken and when they would be taken to address the situation.
14.	<b>Describe the organizational steps the proposed school will take during the planning year to be ready for opening?</b>
Does not meet	<b>Independent Review Team Comments:</b> The applicant team did not clearly or fully describe the organizational steps that will be taken during the planning year to be ready for opening.
15.	<b>Describe how you approached the delineation of roles &amp; responsibilities for staff. How will you attract the talent and skills needed to implement the school as described?</b>
Approaches	<b>Independent Review Team Comments:</b> The applicant team did not fully articulate how the delineation of roles and responsibilities were approached.
16.	<b>Please describe specifically what is included in the "work of Rudolf Steiner" that is not included within the Core Principles from the Alliance for Public Waldorf Education.</b>
Does not meet	<b>Independent Review Team Comments:</b> The following statement was made by the applicant group: “I can state fairly confidently that we are not bringing anything to our school that is outside those principles of public Waldorf education as stated by the Alliance.” A follow-up question revealed that the applicant group had some difficulty in addressing the “work of Rudolf Steiner” and “Anthroposophy” which is also mentioned in the application without definition.
17.	<b>A public school cannot choose to not teach common core standards in the designated grade levels. If approved, how would the school modify its Waldorf curriculum to be in alignment with state standards including teaching lower grades to read?</b>
Does not meet	<b>Independent Review Team Comments:</b> The applicant team appears to be reluctant to abandon a strict Waldorf philosophy that essentially withholds the explicit teaching of reading to children in Primary grades. They agreed to be trained in Structured Literacy but would not agree to teach Structured Literacy with fidelity. They indicated that they would teach the contents of Structured Literacy through Waldorf methodology.

<b>18.</b>	<b>How will you enroll students 2 grades above what you served the previous year?</b>
<b>Does not meet</b>	<b>Independent Review Team Comments:</b> The applicant team’s response did not match what was stated in the charter application narrative.
<b>19.</b>	<b>How will the audit committee use their annual audit to guide their ongoing governance and oversight of finances and operations of the school. And, how will the Finance Committee guide the school in meeting its budgetary requirements</b>
<b>Does not meet</b>	<b>Independent Review Team Comments:</b> The applicant team did not demonstrate knowledge of what is required from either the audit committee or the finance committee.
<b>20.</b>	<b>How much interest in your proposed school has come from outside of the Santa Fe Waldorf School Community? Of your outreach survey what percentage of respondents were Waldorf families?</b>
<b>Does not meet</b>	<b>Independent Review Team Comments:</b> The applicant team did not fully address the question or provide the percentage of respondents that were Waldorf families.