

# **SMCS Official Written Responses to Peer Review**

## **I. Academic Framework**

### **A.1.**

- 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.
  - SMCS firmly believes that our mission as stated in our application is a Waldorf focused specific mission. Students who are prepared for post secondary education, inspired to be lifelong learners, and happier students leading to lower rates of absenteeism ARE Waldorf focused specific mission goals. Educating the whole child (head, heart, and hands) meets their academic needs, their emotional needs and their ability to face the challenges of life and enjoy learning in the process.
  - The Founding Team would like peer reviewers to clarify and be specific about what they believe they would “expect in a Waldorf focused specific mission”. Our mission was adapted from the mission of a 40 year old Waldorf school. There seems to be some assumptions here by the peer review team that are difficult to respond to as they are not explicitly being communicated to The Founding Team.
  
- 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.
  - Connection to the natural world is addressed in the 7th Practice of the Waldorf Method, Outdoor Education. You can find the list of Seven Practices of the Waldorf Method on page 7 of 265. These practices are explained in detail in the Uniquenesses section. Outdoor education is described in detail on page 39 of 265. Attachment 9, titled “SMCS Outdoor Education Handbook Scope and Sequence 1st-8th”, provides a 39 page detailed description of our outdoor education program.

- The area of moral discernment is observed in research, Mitchell, D., Gerwin, D. (2007) *Survey of Waldorf Graduates, Phase II*. Research Institute for Waldorf Education, Wilton, NH, found in Portrait of a Waldorf Graduate.
- As cited in our application, moral discernment results in a child who has experienced the Seven Practices of the Waldorf Method. Moral discernment is observed in the cohesion of the class cohort, the student's behavior and in their social-emotional development. Our approach to this development is described in our "heart" education on page 24 and 25 of 265. The evaluation of this development will be through our Social/Emotional Well-being and Will surveys described on Pages 49-51 of 265.
- 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.
  - We have summarized practical implementation of the teachings of the work of Rudolf Steiner, as it relates to education, in the Seven Practices of the Waldorf Method. These include a development approach to education, educating the head, heart and hands of the child, thematic approaches, and the use of rhythm. These methodologies are then described in detail and with research based evidence for why they work in A.3.
  - Furthermore, at the capacity interview the SCMS founding team clarified that the work of Rudolf Steiner means the developmental method of Rudolf Steiner.
  - The extent of "the work of Rudolf Steiner" to be implemented by SMCS is clearly described in our application in Sections A.1. and A.3. SMCS does not propose to implement anything outside of what is described in our application.
  - The Founding Team is not responsible for any assumptions or preconceived ideas peer reviewers may have of the work of Rudolf Steiner, and we cannot guess what those are even though we feel we are being indirectly prompted about them. We are, however, very willing to answer clearly articulated concerns.

- Two mission-based goals are included in the narrative; however, they do not include specific measurable targets for success.
  - Specific, measurable targets for success are included in detail in our response to B.1. This was meant only to give a big picture of our proposal.
- 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.
  - In our community surveys, we asked participants whether or not they were familiar with Waldorf education, not whether or not they were from or outside our previous community. As explained on page 11 and 12, Meet the Needs of Our Community, many more families were familiar and interested in Waldorf education than could afford to be in the previous school's tuition-based community.
  - ⅓ of our survey respondents stated that they did not have "school age children", and NOT "they did not have children". Even babies will one day become school age children.
  - Our survey did not distinguish between families who were formerly enrolled in the Santa Fe Waldorf School and who were not because our objective was to demonstrate community need regardless of previous enrollment. While our outreach effort included the entire Santa Fe community, the need and desire of formerly enrolled Santa Fe Waldorf School families, who are an integral part of the Santa Fe community, are important and valid and contribute to demonstrating a need for a public Waldorf school in Santa Fe.

### **A.3. Vision Statement**

- 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.
  - The SMCS charter application specifically addresses the needs of the community and demonstrates a compelling demand for the proposed school's education program in our geographic area on pages 11-22 of 265. This is described under the headers 'Meet the Needs of our Community' on Page 11, 'Building on Historic Success' on Page 19, 'Why

Provide a Public Education Platform for your Proposed Community' on Page 20 and 'Serving the Community in Unique and Innovative Ways' on Page 22.

- 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.
  - It is understood by the Founding Team that being in accordance with NM Common Core Standards for NM History is not innovative. The innovation expressed was “Bilingual New Mexico History Education” which is described on Pages 40-41 of 265 of our application. We are proud to teach NM history bilingually. A description of how the New Mexico History Standards will be taught through the block methodology is also included in our application. The innovation is how NM History is taught, not that it is taught.
  
- 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.
  - It must be considered where these studies are taking place. Because we do not have Public Waldorf in New Mexico to make comparative studies, two of these studies came from California and the third from New Zealand. California testing scores 23rd in the U.S. in education, 27 positions ahead of New Mexico. New Zealand has the third best rated elementary school education in the world, compared to the United States 13th place rating. So, if New Mexico student assessment data was included in those charts as a third line, that graph would track differently, and our projected slower initial progression but greater outcome would look less concerning on the graph.
  - Secondly, if the end result is a better product, i.e. continually increasing better than average test scores and more educated students who are better prepared for high school and more likely to enter college, we are better serving our students. This is supported by research included in our application on Pages 11 of 265.
  - The application also cites that in a survey of 1,066 Waldorf alumni.
    - 98% attended college/university after school.

- 95% felt prepared for college/university.
    - 92% Completed initial degree.
    - Our application includes statistics from the former Santa Fe Waldorf School which had a 94% College Matriculation rate on Page 20 of 265 and Attachment 1.
    - Our application also includes, in Attachment 31, several letters of support from Santa Fe Waldorf School alumni that specifically speak to how their Waldorf education prepared them for college, career and life.
  - Accepting a lesser educated student at the end of 8th grade who is less likely to move on to higher education later so that testing scores look better in the earlier years is not the best strategy to serve the educational needs of the students of New Mexico.
- 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.
  - Our application includes a Kindergarten Educational Program, referenced on Page 56 of 265 and in Attachment 3, that describes in detail how each of the 7 domains of New Mexico kindergarten education standards are met. As reiterated in the capacity interview, all core standards except for one (comprehension of complex sounds/blended letters which we will adjust according to Title VI) are met in our Kindergarten Education Program. How they are taught is unique.
  - As seen on pages 6-13 in Attachment 3, SMCS commits to delivering all Domain 2, Outcome 5-8 requirements through a methodology that differs in ways from the “school-next-door”. It details how SMCS is committed to **high quality reading guidance**

for children in kindergarten, with ample attention to phonological awareness, phonemic awareness, vocabulary building, oral language development, comprehension, and phonics using the Waldorf approach. The attachment details how the practice builds early literacy capacity following the best practices of **research validated processes** of cultivating oral, receptive, expressive and written language, as well as reading skill acquisition. Examples would include teaching phonological awareness through clapping games, singing, word plays, group/partner games. Blending, segmenting and manipulating occurs during circle time, chanting and word play and during Kid Writing time.

The difference in delivery of the educational objectives is in laying the pre-academic foundation first, and proceeding with teaching math, early literacy and science through practical, applied activities that ground abstract concepts in the immediate world.

- our Kindergarten Educational Program, referenced on Page 56 of 265 and in Attachment 3 Similarly, phonics are taught through projects that may be domestic in origin, or applied to gardening, surrounding nature, family life. It details how SMCS is committed to **high quality reading guidance** for children in kindergarten, with ample attention to phonological awareness, phonemic awareness, vocabulary building, oral language development, comprehension, and phonics using the Waldorf approach. As such our methods are not that different from the standard public school applications. The description of our kindergarten Educational Program shows that Waldorf pedagogy avoids leaning exclusively into mental effort and abstract concepts at this age, and uses multiple intelligences approach, involving whole body, arts, and leaning on the collective human heritage of spoken and written stories and lore to bring children into the literacy and language arts.
- As charter schools exist for the community's benefit of choice, we see that our delivery of the same standards through the Waldorf method offers value to the public charter school system.

## **B. Mission-Specific Goals**

- 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.
  - Outcome metrics are provided in detailed narrative form on page 49 of the application and in graph form in Figure 17.
- 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.
  - Instructions - Part A for Section B state in the 2nd bullet point. “Align to the student outcomes identified in the mission response (A.1.)”. Furthermore, Instructions - Part A for Section A1 state in the 2nd bullet point “Discuss the importance of the mission to your proposed community”. SMCS has chosen to include community engagement as our 2nd mission goal to speak to these specific points in the application instructions.
  - Increased community involvement leads directly to improved student outcomes as stated with research found in this section on Page 51 of 265: “Research supports the need for parent involvement in school communities: a 2019 American Psychological Association review of 488 independent studies on parent involvement in their child’s education showed a clear correlation between their involvement and improved student academic performance, engagement, and motivation”, and
  - Research stated further on in the application: “Research shows that strong parental involvement increases students’ academic success (The Annie E. Casey Foundation, 2023) Pg 91 of 265.
- In particular, Goal 2 is not in SMART format.
  - Specific, Measurable, Attainable, Rigorous, and Time Bound measurement metrics for Mission Specific Goal #2 are incorporated into the narrative on Page 51-54 of 265.
- 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.
  - School Board Monitoring Assurance for Mission Specific Goal #2 is outlined in Section I-B.1 on Page 54 of 265 and further discussed in Section II-C.1 on Page 163-164 of 265.

## **C. Curriculum**

- 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.
  - The Founding Team has painstakingly gone through CCSS one by one and NM CCS to compare them to the traditional Waldorf educational program. There are differences and, to be in compliance with Title VI, we will have to adjust the differences we have uncovered. As stated on page 67 of 265 of our application (bold text added here) under the title, **TIMELINE & PLAN FOR ENTIRE PROPOSED CURRICULUM**, “The Founding Team of SMCS is excited to have an implementation year to develop a scope and sequence... Block plans, daily lesson plans, assessment rubrics, and block assessments all exist in our collective files. The will be to make them consecutive, **aligned with NM core curriculum standards**, and rich with content”.
  - To say that we would have to “modify its entire curriculum” is a bit of exaggeration. For example, there was **one** NM CCSS identified standard in kindergarten that we did not explicitly meet in our high quality reading guidance. As promised, we will use our implementation year to figure out how to do that along with the other discrepancies that surfaced.
- 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.
  - Our attachments were detailed and extensive (Attachments 10-13 is 325 pages) and would not have fit in the prompt. They were clearly noted in the prompt provided on Page 56 and 57 of 265.
  - We adhere to every single tenant of a high quality reading program, including phonemic awareness and playful use of language to achieve foundational skills for coding/decoding of texts, with explicit instruction through practice and imitation. This is written about in detail in Attachment 3 - Waldorf-inspired Kindergarten Educational Program.

- These will be brought to the children in ways that look different than the “school next door”. However, it is clear in our educational program description that no child will be denied access to knowledge.
- Math: There are research-based strategies incorporated into the curriculum; however, there isn't adequate evidence of research to support the curriculum.
  - Research was included on page 59 of 265 including evidence of increased math scores of students upon entering a public Waldorf school, and quantified research that was particularly noted in African American, Latino, and economically disadvantaged students.
- While the attachments provided do align Kindergarten curriculum with CCSS and NM Content Standards, the same is not done for grades 1-8.
  - ELA: Attachment #4, Educational Program Language Arts, referenced on Page 56 of 265, goes through each grade, including a list of objectives and assessment for each grade based on New Mexico Common Core Standards. This was done in lieu of a table that was used for kindergarten. The founding team committed to continue developing this alignment in the Implementation year scope and sequence on Page 67-68 of 265.
  - Math: Attachment 12 referenced on Page 57 of 265 describes the alignment of Federal Common Core Standards to the Waldorf Educational Program for language arts and math. NM CCSS align very closely to the Federal Common Core Standards for math. The founding team committed to continue developing this alignment in the Implementation year scope and sequence on Page 67-68 of 265.
  - Social Studies/History: Attachment 11, referenced on Page 56 of 265 of our application, includes the New Mexico Social Studies Placement Charts which describe in 82 pages of detail the alignment of the Waldorf Educational Program in Social Studies/History to the NM CCSS.
  - Science: Attachment 13, referenced on Page 57 of 265 of our application, includes a spreadsheet comparison of Federal Common Core Standards to the Waldorf Educational Program in Science.
- 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.

- On Page 67 of 265 under 'Meeting Equity for All Underserved Populations' the application includes a lengthy description of the efficiency of structured literacy quoted from the International Dyslexia Association's Knowledge and Practice Standards for Teachers of Reading. Since dyslexia represents 80-90% of all learning disabilities according to the Yale Center for Dyslexia and Creativity, the Founding Team feels they are speaking directly to Special education needs.
- How the school curriculum will meet the needs of all underserved populations is described on Page 74-81 of 265, Section I.D. Bilingual Multicultural Education, Indian Education, Hispanic Education and Black Education; Page 106 of 265 'The Needs of At Risk Youth'; Page 109 of 265 'Plan for Instructional Services/Support for IEP'; Page 119 of 265 'Evaluating and Monitoring Progress & Success of SPED Students'; and Page 123 of 265 'English Learners'.

## **F.2. Yearly Calendar and Daily Calendar**

- School-wide assessment periods are not provided.
  - School-wide assessment times are provided in Attachment 14 and 15, as referenced on page 100 of 265.
- The calendar begins in August and ends in July. It needs to begin in July and end in June.
  - This error will be corrected.
- The total instructional hours on the proposed calendar equal 1079 hours. The minimum requirement for instructional hours in 2024 is 1140 hours.
  - It is our understanding that a judge in Roswell entered a temporary injunction preventing the new rule regarding 1140 hours from going into effect, thus with that in place at the time of submission (and now) we chose to stick to the 1079 hours.
- They have not indicated what additional days are included for K-12 plus funding which was included on 910B-5 form.
  - We did not indicate these days because they are not included in our 910B-5. Please refer to all 5 years of our 910B-5 in Appendix F.

- 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.
  - This error will be corrected.
- The applicants state that they can claim a full school day for their Friday early release days. This is not in statute.
  - Included in our calendar is 1079 hours of instructional time. On Fridays, the early student release moves into teacher professional development. These hours are taken from the 60 hours allowed a year for professional development.
  - Any errors pertaining to the outcomes of court injunctions around number of required school days/school hours will be corrected.
- Applicants did not state how long the lunch period was.
  - Length of lunch periods, 30 minutes, is included with a 20 minute recess period, shown in Attachment 16 and 17, referenced on Page 101 of 265
- 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 attachment #17, one will see that teacher professional development will go until 4:15, an extra 35 minutes beyond instructional time to instructional time.
  - On Page 97 of 265, SMCS has committed to meeting all NM PED requirements for instructional time. Minor discrepancies in our proposed school calendar will be addressed and fixed.
- 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.
  - Dismissal is at 1:05. Attachment 16 shows our Friday dismissal as directly after lunch (12:35-1:05), which is 30 minutes long so ends at 1:05. On partial days, we were unable to provide the necessary instruction and end the day at 1:05 so school would end at 1:35.

On Page 97 of 265, SMCS has committed to meeting all NM PED requirements for instructional time. Minor discrepancies in our proposed school calendar will be addressed and fixed.

### **F.3. How Instruction will be effective for the student population.**

- The applicant team's response does not address diverse populations
  - All required anticipated student populations were identified on pages 104-106 of 265.

- “Special Factors Influencing the Makeup of Student Populations” response can be found on page 106.
  - The “Impact of Educational Philosophy” and how it has been designed to meet students’ needs can be found on Page 107 of 265. (Further detail of how SMCS will meet the needs of specific categories of a diverse student population is addressed in this section on Page 106 of 265 ‘The Needs of At Risk Youth’, Page 74-81 of 265, Section I.D. Bilingual Multicultural Education, Indian Education, Hispanic Education and Black Education; Page 109 of 265 ‘Plan for Instructional Services/Support for IEP’; Page 119 of 265 ‘Evaluating and Monitoring Progress & Success of SPED Students’; and Page 123 of 265 ‘ English Learners’.)
  - “The Needs of At-Risk Youth” can be found on page 106 of 265.
- Does not explain how the yearly calendar and daily schedule have been designed to meet teachers' needs.
    - There appears to be a discrepancy in the scoring rubric provided to the Peer Review Committee and the Part A - Instructions and Evaluation Rubric provided to the applicants by the PED. How the yearly calendar and daily schedule have been designed to meet teachers’ needs was not specifically asked for in Part A-instructions. The last two bullet points in the instructions read as follows:
      - “Explain how the yearly calendar and daily schedule have been designed to meet students’ needs.
      - Explain how the yearly calendar and daily schedule have been designed to meet students’ 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.
    - As a state chartered school, SMCS is required to serve students from the entire state. This is why we cite a statewide statistic for special education needs.
    - The citation states: “In New Mexico public schools, one out of every five students receives special education because they are identified as having a disability or being gifted,” (SPED Progress Report Program Evaluation Unit Legislative Finance Committee November 14, 2023). The citation and the report by the Legislative Finance Committee

do in fact address disability, gifted students and, in the report, levels of disability. This is why SMCS uses this report in determining our anticipated special needs population. The entire report can be found here:

- [https://www.nmlegis.gov/Entity/LFC/Documents/Program\\_Evaluation\\_Reports/SPED%20Progress%20Report%202023-11-14%20FINAL.pdf](https://www.nmlegis.gov/Entity/LFC/Documents/Program_Evaluation_Reports/SPED%20Progress%20Report%202023-11-14%20FINAL.pdf)

- 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 school's enrollment cap in the first year is 108 students. The estimated 20 special education students is based on our enrollment cap. Applicants were advised in our charter application training to be conservative with our enrollment numbers since most charter schools do not meet their enrollment cap in their first year. To respond to this, we worked with a 75% projected enrollment for our budget for our first year of operations.
- 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.
  - This error will be corrected.
- The team indicates it only is planning outreach to one zip code outside the one in which it is located.
  - This is a misrepresentation of what is written in our application. Our application states (bold font is for emphasis) "As seen in the graph below, to best align our student population numbers with the demographics researched above, outreach activity **priorities** were directed toward the 87507 area code. In our implementation year, the SMCS aims to organize a single bus route to begin our school year. This bus route will be laid across the 87507 zip code. In this way, we hope to balance our demographics between the demographics of the different area codes that will comprise our populations," followed by **Figure 32 - Various demographics of Santa Fe by area code**, (Census Reporter, 2023.)
  - We are prioritizing our outreach and bus route (we can only afford one) based on maximum need.

- To further shine light on our actual intention as stated in our application:
  - From J.1. Transportation: “The Head of School, or determined administrative designee, will work with our contracted service provider to create a bus route that targets ridership in the 87507 zip codes first and then expands through 87505 second, as needed.” Page 216-219 of 265.
  - From G.1. Outreach and Recruitment Plan: “SMCS will continue to build on our outreach and engagement success post-authorization. We will capitalize on the multiple relationships and supportive conversations we have had with numerous community members and organizations to maximize our enrollment outreach and recruitment efforts throughout Santa Fe County, with a particular focus on the 87505, 87507 and 87508 zip codes.” Page 209 of 265.
- SMCS actual Outreach plan is described in detail on Pages 209-213 of 265 in Section II-G.1 Outreach and Recruitment Plan, which states “SMCS will continue to build on our outreach and engagement success post-authorization. We will capitalize on the multiple relationships and supportive conversations we have had with numerous community members and organizations to maximize our enrollment outreach and recruitment efforts throughout Santa Fe County, with a particular focus on the 87505, 87507 and 87508 zip codes.”

### **G. 1a. Instructional Services and Supports for Students with IEPs**

- 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.
  - As stated in G(1a) section of the proposal, we will follow the MLSS protocols which provide detailed directions on monitoring and supporting and layered instruction, page 110-113 of 265). The school commits to expanding its understanding of the best practices for supporting gifted students and students with disabilities (IEP students).
- 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.

- Special education teachers are included in our budget, specifically a special education director under 1211-Student Support Services, and an interventionist under 1318-Specialists. These are our special education teachers. We also budget a contracted educational assistant and a contracted school counselor under 2100 Purchased Professional and Technical Services. We believe that our special education department is robust enough to serve our anticipated special needs population.
- 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 following quote is taken from page 118 of 265 of the application under the heading **TIMELINE, BENCHMARKS, & PEOPLE RESPONSIBLE**. Bold font is given to highlight benchmarks:
    - Timeline for developing a working SMCS Special Education Manual will begin with approval of this document, with full implementation completed by the launch of school. The process will **involve assembling a team** to be led by an interim Special Ed Coordinator, interim administrator, board member, regular education teacher, and other special education professionals that can be brought in by the school team. The manual will **document procedures and systems** needed for full compliance and the further **development of methodologies for inclusion** that will utilize Waldorf methods of delivering special education support in a variety of environments. This document will also document **specific discipline processes** for school and families.
- The capacity of the School District is not addressed.
  - On page 118 of 265 of the application, details are given to address the capacity of the School District as it relates to FAPE in the section titled "Capacity of the School District to provide Special Education Services and FAPE"
- The school will provide data to the Board as part of the reporting process; however, the process is undefined.

## G.2a. Required Curriculum and Instructional Supports for English Learners

- 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."
  - This may be a matter of semantics as “inclusion” and “full immersion” are synonymous.
  - The Founding Team understands that 45 minutes of daily ELL instruction is required by law. The application is suggesting that, whenever possible, the 45 minutes are given in block and sheltered instruction by a TESOL trained lead teacher instead of the pull-out option.
  - The full quote from which the above excerpt was pulled is as follows: “Furthermore, as an inclusion model, we will encourage teachers to work towards their TESOL certificate, so that when possible, students can receive their 45 minutes of daily ELL instruction within the classroom and stay with their “whole community”.
- Middle school students must be offered an ELD course.
  - This error will be corrected.
- The applicant team’s response does not address how students not new to public education in New Mexico will be identified as EL.
  - Under the heading **MONITORING PROGRESS** on page 132 of 265, it states, “All parents of students entering the public school system for the first time must complete a Language Usage Survey (LUS). Each student should have only one LUS completed during his or her public education career in the United States. The LUS is kept in the student’s cumulative file and transfers as part of the student record to the schools that the student attends.”
  - Under the heading “Identifying ELL Students”, the application states, “Each student should have only one LUS completed during his or her public education career in the United States. The LUS is kept in the student’s cumulative file and transfers as part of the student record to the schools that the student attends.” Page 125 of 265. This directly addresses 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 Founding Team is aware that students are identified as ELL through the Home Language Survey. We believe in the value of using summative and formative assessments. While Home Language Surveys are the public schools summative assessment for ELL students, we believe that teachers should be empowered to formatively assess their students' struggles with MLSS, for a myriad of concerns, including language proficiency.

Below is the quote where the application addresses this topic as it relates to “Identifying ELL Students”. Bold fonts are used to show how the intention is identifying the need for further support, not a formal summative assessment.

- “MLSS is a holistic intervention framework that guides educators, those closest to the student, to intervene quickly **when students need additional support**. The MLSS framework reflects **the support that the classroom teacher, school, family, and health and wellness staff offer toward readying students to experience academic and behavioral success** in school resulting in students being ready for success. MLSS will be used by teachers to identify a number of different challenges a student might face, including **if a student is struggling due to a lack of language proficiency.**”
- The response does not answer how the school will implement the English Language Development Standards
  - The application addresses how the school will implement the English Language Development Standards directly under the heading, “Meeting State ELD Standards & Use of the Results of WIDA” on page 133-134 of 265.
  - Furthermore, the Founding Team provides a detailed description of how they will implement the English Language Development Standards through the evidence-based framework of the SIOP from page 126-131 of 265.
- Listing how the school will be evaluated for protecting the rights of ELs does not say how they will protect the rights of ELs
  - The standards by which English Learner students rights are protected are provided on page 131 of 265 under school compliance. The source used was from the PEC Charter Performance Review and Accountability System 2019 PDF.

- o Further considerations to protect the rights of EL students are found on page 144 of 265, under the heading, “Considerations for English Language Learners”.

### **G.2b. Monitoring and Evaluation of English Learners**

- 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.
  - o The application does not indicate that parents will decide if an EL is reclassified. Instead, on page 133 of 265, it states:
    - “Parental **opinion and consultation**, achieved through notice to parents or guardians of the language reclassification and placement including a description of the reclassification process and the parents’ **opportunity to participate**, and encouragement of the participation of parents or guardians in the reclassification procedure including **seeking their opinion and consultation during the reclassification process.**”
- Progress will only be monitored at the beginning and end of year.
  - o This statement is inaccurate. In the paragraph describing EL progress monitoring, it states that students will be formally **evaluated** at the beginning and the end of the year using appropriate WIDA assessments. It then goes on to say that teachers will “continuously monitor each English Learner’s ability to achieve growth and progress through their proficiency level on the grade-level standards. Every evaluation period, teachers evaluate the recorded evidence from the ELD Monitoring Tracker and evaluate student’s progress with respect to their Proficiency Level Descriptors for the WIDA ELD Standards.”
- The reporting process to students and families is underdeveloped.
  - o Reporting processes to students and families are describe for WIDA testing and reclassification processes.
- The response does not address monitoring of exited EL students.
  - o This error will be corrected.

### **G.3. Plan to adhere to ESSA and State Statutes**

- The applicant team’s response does not demonstrate that rigorous and culturally meaningful curricula and instructional materials will be developed and implemented.
  - o In addition to the information provided in this section, The Founding Team addresses a rigorous and culturally meaningful curricula on page 76-77 of 265 in the Bilingual Multicultural Education Act under the heading, “Cultural Sensitivity and Inclusivity”.

- o Under Annual Professional Development Plan on page 192 of 265, specific trainings are suggested for faculty and staff, including:
  - AWSNA's "Decolonizing Curriculum"
  - AWSNA's "Uncovering and Dismantling Racism"
  - AWSNA's "Teaching for Black Lives in Waldorf Schools"
  - Section 9, Anti-Racism and Racial Sensitivity Training and Professional Development.
- o A list (although not exhaustive) of culturally meaningful curricula and instructional materials are included in **Figure 21 - Foundational curricular resources for academic subjects**. Some of these materials are references for the teacher to teach from while others are student readers that reinforce the subject matter. They include:
  - Fairy Tales From Around the World
  - World Tales
  - African Folktales
  - Ancestor Approved Intertribal Stories for Kids
  - In the Beginning: Creation Stories from Around the World
  - Wonderful Houses Around the World
  - In the Footsteps of Crazy Horse
  - Esperanza Rising
  - Pueblo Nations
  - Multicultural Mathematics
  - Ghost
  - Long Walk to Water
  - Africa: A Teacher's Guide
  - Red Scarf Girl
  - The Boy Who Harnassed the Wind
- The response does not ensure best practices.
  - o A complete description of how SMCS will ensure best practices is included in the heading, **BEST PRACTICES IDENTIFICATION AND APPLICATION** with subheadings: "Culturally and Linguistically Responsive Policies", "Reporting for Students and Families: Communication and Engagement", and "Evaluating Program Effectiveness" from page 138-140 of 265.
- Supplemental programs or services are not included.
  - o Please refer to the heading, **PROFESSIONAL DEVELOPMENT STRAND DESCRIPTION** on page 137-138 of 265 with the subheadings "Anti-Bias, Anti-Education", "Identification of and Support for English Learner at SMCS", "CLR/SbD Practices within MLSS", "Cases Studies and Book Clubs", CLR/SbD Communication and Engagement", and "SEL and CLR/SbD", *each of which is a description of a supplemental program or service offered*.
- The response does not identify the regular intervals at which progress will be monitored.
  - o Monitoring progress dates provided in the application include:
    - The Governance and Ethics Committee will also hear Equity Audit reports after they are published on May 1st on page 157 of 265.
    - On the School Board Calendar in July: "Equity Council member presents research and work to school for specific recommendations to meet their goals based on the CLR/SbD plan (NM PED Culturally and Linguistically Responsive Schooling by Design)", page 162 of 365

- On the School Board Calendar in December: “Equity Council members present an assessment of their progress in meeting their CLR/SbD goals”, page 162 of 365
- The response does not identify specific actions/reporting that will engage students and/or families.
  - On page 139-140 under the title “Reporting for Students and Families: Communication and Engagement”, the following engaging specific actions/reportings are listed:
    - Weekly updates to the parents
    - Twice a year parent-teacher conferences or family visits
    - Specific family programming events
    - Our plan to share progress data.
- The response does not evaluate the effectiveness of its programs to improve educational outcomes.
  - This question was *thoroughly* answered on page 140 of 265 under the title “Evaluating Program Effectiveness”. Included are the following bullet pointed examples:
    - Scores on state and local assessments
    - Scores on annual English language proficiency
    - Grades in content area courses
    - Retention rates
    - Reclassification/exiting rates
    - Participation rates in special education services and eligibility categories
    - Mobility and attendance rates
    - Participation in extracurriculars
    - Social, emotional, and behavior trends across subgroups, including suspension rates
    - Representation across layers 1-3 in Multi-Layered Systems of Support
    - Percent of students qualifying for and participating in EL programs and services
    - ACCESS for ELLS 2.0 performance trends (within and across years)
- The response does not describe how the proposed school will meet the specific requirements of the Black Education Act.
  - Below is a quote taken directly from the application page 80 of 265, describing how SMSC will meet the specific requirements of New Mexico House Bill 43 - Black Education Act.
    - Disciplinary sanctions may include in-school suspension, school service, suspension or expulsion. Corporal punishment shall be prohibited by each local school board and each governing body of a charter school. Prior to enacting it, each proposed disciplinary sanction will be explicitly reviewed for evidence of unconscious bias to ensure such bias is not being enacted unconsciously onto black, hispanic, or indigenous students (or other students from non-dominant cultural backgrounds).
    - Students may carry and self-administer asthma medication and emergency anaphylaxis medication that has been legally prescribed. Faculty shall seamlessly fold in such medication as good and beneficial for the community.
    - Students will have immediate access to a back-up medication that can be kept at the school (provided by the parent) in the event of an emergency. Faculty and Staff will be informed of where such medication is kept and at least one member of faculty with knowledge of how it is administered shall be available at all times.
    - Section 9 “Anti-Racism and Racial Sensitivity Training and Professional Development.” Each year, all school personnel shall successfully complete an

online or in person antiracism, racial awareness and sensitivity training, or professional development approved by the department that addresses race, racism, and racialized aggression and demonstrates how to create and foster an equitable and culturally responsive learning environment for racial minority students.

- We will provide links, including a Q-R code to the statewide hotline to report school-based racially charged incidents or racialized aggression, as well as direct reporting to a SMCS administrator that will monitor and address such incidents.
  - MCS will provide take-home resources to students, parents, and school personnel with links and other information to directly access the culturally relevant resources on the NMPED website.
  - We will also provide mechanisms for parents, community and business organizations, public schools, public post-secondary institutions and state and local policymakers to work together to improve educational opportunities for Black 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.
    - To clarify nomenclature, SMCS has not proposed an “Operations Manager”. We have proposed an Operations Director who will come on-board as a fulltime employee of the SMCS Operations Team in Year 4 of operations. Please refer to ‘Operations Director/Operations Coordinator’ in our response to II.D.1 on Page 177 of 265 in Part C of our application and in Appendix C Staff Job Descriptions for the specific duties assigned to the Operations Director. In Years 1, 2 and 3 of operations, the budgetary responsibilities of this position will be handled by a contracted Business Manager, called the ‘Operations Coordinator’ in our Organization Charts, while the other responsibilities will be shared by members of the Leadership Team.
    - On page 177 of 265 of our application we state “Operations Director will be responsible for the planning, coordinating and managing of the day-to-day business operations of the school under the direct supervision of the Head of School”. The Head of School is

responsible and heavily involved in “the faculty, curricular, instructional materials or student progress functions of the school” and they are directly supervising the work of the Operations Director.

- o The Founding Team believes that working with contracted service providers is an appropriate job responsibility for the Operations Director position. On Page 177 of 265 of we further describe that the Operations Director “will also be responsible for overseeing all aspects of school food services, transportation and procurement” clarifying what those contracted services are. This is in line with practice at other charter schools.

### **H.1. Assessment Plan**

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.
  - o We acknowledge our typo here. The description of WIDA-ACCESS testing is correctly described in **Figure 36 - Grade specific assessment chart timeline**.
- 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.
  - o This is in direct contradiction of what is stated in the application. The following quote is from the section of the application being reviewed here, page 143 of 265 under the heading **CORE ASSESSMENT METHODS**; “Using Multiple Measures” (bold font has been placed here for emphasis):
    - “SMCS will base performance assessments on the Waldorf/Common Core State Standards developed by the Alliance for Public Waldorf Education. **These**

**standards**, provided in the Supplementary Binder, **were designed to align Waldorf methods curricula with Common Core Standards** over the nine year period of kindergarten through eighth grade. SMCS chose these standards based on their clear, grade-by-grade correlation of Waldorf methodology with the Common Core State Standards.”

- 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.
  - **Figure 36 - Grade specific assessment chart timeline**, page 144 of 265, includes all state or district mandated assessments periods and the specific data being tested. How this is utilized to inform instruction is found in the narrative description on page 141-142 of 265 (**ASSESSMENT PHILOSOPHY**; the introduction; Beginning with the Goal; Summative Assessment)
- 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.
  - We give great detail to this process in **ASSESSMENT PHILOSOPHY**; *Summative Assessments* on page 143 of 265.
  - **CORE ASSESSMENT METHODS**; Responsible Parties describes how teachers will be trained to administer tests.
  - How teacher’s will be supported is described under **ASSESSMENT PHILOSOPHY**; *Beginning with the Goal*, which proceeds this section.
  - We include lists of suggested training and onboarding in our section on professional development. We suggest several trainings in **ANNUAL PROFESSIONAL DEVELOPMENT PLAN**; *NMPED core curriculum and best practices* that include trainings on assessments (bold added here for clarity):
    - NM STEM Symposium,
    - **CANVAS Courses** (selected according to needs of the district, the school, and the class. **Some of the suggestions for all teachers will be Assessments**)
    - LETRS (Language Essentials for Teachers of Reading and Spelling) K-5 required
    - **iMSSA trainings**

## H.2. Plan for Data Assessment Analysis

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.

- o We discuss responsible parties on page 143 of 265 under the heading “Responsible Parties”.
- How the school will regularly evaluate the academic program or corrective interventions.
  - o In addition to the details of academic program evaluation and corrective interventions given on page 143 of 265 under the title, “Summative Assessments”, our model also gives power of corrective curriculum measures to the Teachers’ Council. A detailed description of this is found on page 206 of 265.
- The board’s role in analyzing this data to inform school wide progress and potential changes.

### **H.3. Plan for Student Progress/Achievement & Communication Plan**

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 application states on page 150 of 265 that, “The system will provide all necessary individuals the ability to access the data in real time so that families may access up to date information. Wherever appropriate, the data collected will be used to fine tune SMCS’s assessment process and monitor the progress of our students.”

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

- This error will be corrected.

## II. Organizational Framework

### A.2 School Board Member Qualifications

- 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.
  - In our capacity interview, the Founding Team defined “anthroposophy” as the study of the development of the human being.
  - This definition was not included and we see it may have been helpful, though this is one of the only references to Anthroposophy in the Application and here it was meant as an alternative to training in Waldorf pedagogy, and also as a preference (not a requirement) along with other mission-aligned areas of expertise. The New Mexico Anthroposophical Society has a robust presence in Santa Fe, and thus the Board may benefit from someone with that interest being in its membership. It is not a requirement, and pales in comparison to the many elaborated upon requirements and goals for Board membership. We apologize for using this term of art without definition, though we want to emphasize that the meaning of this term is not critical to our application in any way. The “Seven Principles of Public Waldorf Education” elucidated and referenced throughout the Application are the elaboration and expression of Waldorf pedagogy that SMCS plans to bring to the school.

### C.1. Governing Body Plan for Monitoring Outcomes

- 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.
  - This Section spans four pages and includes a month-by-month timeline on pages 165-166 with clear action steps for each month, as well as a list of some specific items whose timeline will need to be determined during the planning year.
- 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.
  - The Application, under the subheading “Monitor Financial Performance,” states the Head of School will present the board with budgetary reports monthly, including “any challenges to expected money flow.”

- The HOS is the link between the School and the Board, and thus facilitates the Board's access to financial reporting. Of course, the Board is aware of its fiscal oversight responsibility, as is stated throughout the application, and specifically in Sections II-A(2) on Finance and Audit Committees, as well as in Section II-A(1) on overall governance structure.
- 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.
  - As stated in Section II-A-(1), the Board is responsible for reviewing and approving the annual budget. The Application is clear about this responsibility.
- 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.
  - This is covered in detail in Section II-A(2) and the Founding Team is clear about the statutorily required audit.

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 Founding Team refers to section II-B(2) on the Board's many evaluation processes that also speak to organizational performance in great detail.
- The response does not address factors such as staffing, teacher retention, complaint process, etc.
  - These are all addressed in other sections of the Application in great detail and did not appear to be called for in this section.
- 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 Application states that the Governance and Ethics Committee of the Board will monitor various measures of mission-success and the School's adherence to teaching the whole child, i.e. head, heart and hands. This is also covered in detail throughout the Assessments section of the Application, as well as Section II-B(2).
- The financial monitoring plan is extremely weak and does not contain a comprehensive plan for the full scope of their financial oversight responsibilities.
  - The response specifically refers to Section II-A(2) on the Finance and Audit Committees, which detail the Board's financial monitoring. In addition, the month-by-month list of action items refers to financially monitoring items. Lastly, Section III-C(3) specifically addresses legal and fiscal oversight, and the response provides great detail and a strong plan for these items.
- 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.

- o The founding team is aware and the application responses states that financial reports will be presented and reviewed monthly on page 164, “Monitoring Financial Performance” subheading.

### D. 3. Staffing Needs and Plan

- A Board committee cannot participate with the Head of School in hiring. The Board can only hire the Head of School.
  - o SMCS’s response to II.C.2 on Pages 166-169 of 265 clearly describes the hiring process and the roles and responsibilities of the Head of School and clearly states that that School Board will 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
  - o Our response is also in the budget section.
- Considering the special education director is to oversee special education and EL students, 0.5 FTE for the first two years seems inadequate.
  - o For Year 1 of Operations, as shown in our Organizational Chart on Page 173 of 265 of Part C - Written Responses of our application, our Student Support Team includes a 0.5 FTE Special Education Director, a 0.75 FTE Interventionist and 1 contracted Education Assistant. For Year 2 of Operations, as shown in our Organizational Chart on Page 175 of 265, our Student Support Team includes a 0.5 FTE Special Education Director, a fulltime Interventionist, two contracted Educational Assistants and a 0.75 FTE School Counselor. We believe that our special education department is robust enough to serve our anticipated special needs population.
- 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.
  - o SMCS fully understands that the hiring of faculty and staff is the responsibility of the Head of School. The Head of School’s responsibilities are explicitly stated in Appendix B - Head of School Job Description, which includes, under ‘6.a Personnel/Human Resource Oversight’ “Hiring and dismissal of all staff and faculty”.
  - o Under ‘Hiring of Leadership Team, Faculty and Staff’ on Page 189 of 265 of Part C - Written Responses of our application, we describe the Board Hiring Committee assisting the Head of School in the hiring of staff for the Implementation Year only.
  - o Under ‘Subsequent Year Hiring’ on Page 190 of 265 of Part C - Written Responses of our application, we clearly state that “hiring candidates for all positions except for the Head Of School will be the responsibility of the Head Of School, supported by the Leadership Team”. Therefore, SMCS is in compliance with 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.
  - The process described under 'Hiring of Leadership Team, Faculty and Staff' with the supporting 'Timeline' on Pages 189-190 of 265, supported by further detail on recruitment as described in 'Advertising and Recruitment' on Page 190 of 265 of Part C- Written Responses of our application demonstrates that our staffing plan is reasonable and adequate to support effective and timely implementation of the academic program. Per our timeline, staff and faculty positions will be filled as of March 2025.

#### **G. 1. Outreach and Recruitment Plan**

- 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.
  - The Peer Review Committee appears to be misinformed about the status and availability of the CSP Grant. In fact, applicants were informed during the trainings that this grant is indeed available and staff from PCSNM, who are administering the CSP grant for this 5 year grant cycle, participated in one of the training sessions to inform applicants about the availability of the grant.

### III. Financial Framework

#### B. Budgets

##### B. 1. Attached Appendix F, 910B5 State Equalization Guarantee (SEG)

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.
  - As noted in our response to Section III-B.3 Budget Narrative on page 226 of 265, and under 'Operations Funding Assumptions' on page 228 of 265 of Part C Written Responses of our Charter Application, the applicant team was informed by CSD during the trainings to not include special education student numbers in the budget for year 1. However, SMCS anticipates receiving special education students, therefore we decided to include staff to serve their needs in Year 1.
- The number of special education students on the 910B-5 was different from the number on the Figure 33 table.
  - Special education student numbers in Figure 33: Y1 – 19, Y2 – 32, Y2 -38  
Special education student numbers: 910B-5: Y1 – 0, Y2 -24, Y3 – 36  
910B5 special ed numbers are based on the conservative enrollment percentages of 75% for Y1, 85% for Y2 and 95% for Y3, while Figure 33 numbers are based on 100% enrollment numbers.
- The number of ancillary service units was too large for the number of special education students.
  - SMCS does not believe that the ancillary unit numbers are out of line with our anticipated special education population. Throw in something about the Yazzie Martinez lawsuit?
- The applicant used 18% for their special education student count, but the average in district is about 15%. Applicants were directed to use 15%.
  - Applicant teams were directed to use 18% by CSD.
- The number of students on the 910B-5 was smaller than on the Figure 33 table for years 1, 2 and 3.
  - See previous bullet point
- The applicant did not budget for Elementary PE; that line item is now allowed.
  - Applicants were directed by CSD to NOT budget elementary PE because funding was capped. *Email thread w/ Melissa as proof.*
- The applicant used the FY24 unit value, which is \$200/unit lower than the correct unit value for FY25.
  - Applicants were directed to use \$6241.67 by CSD. This was also the base unit value in the budget template that was provided to applicants.
- 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.
  - *No need to address next bullet (neither positive nor negative)*

- 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.
  - SMCS used the budget template that was provided by CSD. It appeared to us as if these fields were not to be used at this point.
- Applicant used an accurate FY24 At Risk Index.
  - Thank you.

## **B. 2. Attached Appendix G: Proposed five-year Budget Plant**

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)
  - SMCS used the budget template that was provided by CSD. These codes were included in that template.
- 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.
  - Teachers salaries are budgeted at an average of \$58,000 in the first year, assuming a majority of teachers would qualify L2, with a minority at L1.
- Did not budget for special ed teachers (1412) but put something in Contracted under student support.
  - We budget the special education director under 1211-Student Support Service, and the interventionist under 1318-Specialists. These are our special education teachers.
- Has a budget for a SPED Director.
  - SMCS believes that it is important to have a special ed director to serve our anticipated special education student population.
- No budget for gifted teachers, but there are gifted teachers noted in Figure 33 table.
  - Interventionist is also the gifted teacher. This is common practice in many public schools in Santa Fe.
- Did not budget for any special ed services except for an interventionist (see the 1412 comment above) and a contracted psychologist.
  - We budget the special education director under 1211-Student Support Services) and the interventionist under 1318-Specialists. These are our special education teachers. We also budget a contracted educational assistant and a contracted school counselor under 2100 Purchased Professional and Technical Services. We believe that our special education department is robust enough to serve our anticipated special needs population.
- The Head of School was budgeted in the wrong area, under 2400. Should be 2300.

- o Head of school was budgeted under 2400 School Administration line item 1112. They are reflected in the budget.
- Many of the FTEs in the budget were different from the table provided in the charter narrative.
  - o **Bullet points 8, 9 & 10:** Our staffing plan includes teachers that are both employees and contracted. Figure 42 - FTE Chart of faculty and staff erroneously shows 4.0 FTE for Middle School Match, Science , History and ELA. These FTE should be 1.0 each, totalling 14.5 FTE, which is what is shown in our Organizational Charts and reflected in our budget in Function 1000 which shows 14.5 FTE for teachers for Years 3-5.
- 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.
  - o See previous bullet point
- Some FTEs in the table were not budgeted.
  - o See previous bullet point
- Contract business manager was budgeted in the wrong function (2300 should be 2500).
  - o Thank you. Will be corrected.
- There was a budget under this job code (1115), as an Operations Director, but not until year 3.
  - o For years 1 and 2, the business manager is a contracted service and is included under Function 2300. In Year 3 when this position becomes a full time employee (Operations Director), it has been moved to 2500 in the budget.
- They did not budget for property and liability insurance.
  - o We were optimistic that Property and Liability Insurance would be covered by the Supporting Foundation and included in the rent package. However, we recognize that an additional \$15,000-20,00 expenditure may need to be included.
- No budget in function 2200: Testing, Library and Technology go here.
  - o Testing, Library and Technology - These items are budgeted under Support Services - Function 2200.
- Probably did not budget enough for instructional materials.
  - o SMCS is confident that we have budgeted enough for instructional materials. Unlike other schools, we do not use a great number of textbooks. In our unique case, we already have access to many of the books and necessary materials.
- In years 1, 3, 4, 5 the expenditures exceed revenue in operational.
  - o The general fund expenditures were calculated for maximum enrollment while revenues (SEGs) were determined at 75% of max enrollment. Both factors would remain fluid through the 80-120 day determinations, at which point final budget adjustments would be completed to balance the budget.
- For year 2, the net revenue (Rev - Exp) was only 5,000 so could not support the over budget in any of the years.
  - o Again, expenditures and revenues will fluctuate throughout the year, but were calculated in a conservative range that allows minor adjustments to lead to a balanced budget, as

explained in the narrative Section III. B. (3), page 228. Other funds and revenue sources will be utilized to maintain a balanced budget, and were calculated in overages.

- The applicant budgeted carryover cash, but all but year 2 had deficit spending so there would be no carryover cash.
  - In addition to general fund expenditures and revenues, other funds, revenue sources and grants will be utilized to maintain a balanced budget. Additional Funds were calculated in overages. See Section III. B. (3) of narrative
- In all years, expenditures exceed revenue, and with a deficit already existing in operational, the deficit could not be transferred to operational.
  - See previous bullet point
- There was a budget in years 1 and 2 for obsolete fund 24146.
  - Numbers put in Fund 24146 were used for internal budget calculations/CSP planning but are not factored into our budget.
- There were expenditures in years 1 and 2 for fund 24153, but no revenue.
  - This is a budget error that will be corrected.
- Figure 33 table: FTEs for Special ed staffing were more than what was in the budget except for the special ed director.
  - Besides the Special Ed Director, other special education positions are the interventionist, which is budgeted under 1318-Specialists. These are our special education teachers. We also budget a contracted educational assistant and a contracted school counselor under 2100 Purchased Professional and Technical Services. We believe that our special education department is robust enough to serve our anticipated special needs population.

### **B. 3. Budget Narrative**

- The applicant did not budget 100% of expected enrollment.
  - As noted in our budget narrative (Section II-B.3) on page 225 of 265 of Part C Written Responses of our Charter Application, SMCS is using conservative enrollment numbers of 75%, for Y1 of operations, 85% of Y2 of operations and 95% for Y3 of operations. Our budget reflects these enrollment numbers.
- The 910B-5's reflect an expected percentage of their hoped-for enrollment for each year.
  - These numbers and percentages were taken from advice in PEC trainings and data shared by new charter schools in our geographic region, as stated in Section III. B. (2), page 224-225 of the narrative.
- 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.

- o The general fund expenditures were calculated for maximum enrollment while revenues (SEGs) were determined at 75% of max enrollment. Both factors would remain fluid through the 80-120 day determinations, at which point final budget adjustments would be completed to balance the budget.

### **C. 1. Internal Control Procedures**

- A process to evaluate compliance with internal control procedures is not provided.
  - o See Section III. C. (3) under 'Proper Legal and Fiscal Oversight by School Board' on Page 232 of 265 of Part C - Written Response of our application. The Board will determine their evaluation process immediately following formation and in conjunction with the Head of School and the Operations Director or management firm.
- Appendix H is the school's proposed financial policies and procedures rather than internal control procedures.
  - o As stated in Appendix H, page 1: Collectively, these policies comprise a set of internal controls to ensure effective, efficient operations, segregation of duties and responsibilities, reliability of financial reporting, legal and regulatory compliance, and risk mitigation. They also establish responsibilities, separate recordkeeping from management of assets and apply technology controls.
  - o Appendix H's naming convention was stated correctly in the Application, i.e. Internal Controls Procedures, but titled "Proposed Financial Policies and Procedures" in Appendix H. The document, as summarized in the above bullet point, provides for internal controls and compliance with New Mexico law.
- There is nothing that assures the safeguard of assets, segregation of payroll, etc.
  - o See Appendix H, Internal Control Procedures, pages 9-10 describe the segregation of payroll responsibilities and authorizations.

## IV. Evidence of Support

### B. Community Support

- 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.
  - Our proposed enrollment cap at capacity is 208. 300 responses is almost 30% higher than our proposed enrollment cap. In addition, many of the respondents have more than one school-aged child, and thus 300 responses indicated more than 300 potential students.
  - We are confused how the Peer Review Committee concluded that “Support appears to be primarily from the community previously involved with the school that closed” based on our response to Section IV.B Community Support. Our survey did not distinguish between families who were formerly enrolled in the Santa Fe Waldorf School and who were not because our objective was to demonstrate community need regardless of previous enrollment.
  - SMCS vigorously stands by our outreach efforts and maintains that **broad support has indeed been demonstrated.** In our response to Section IV.B on Pages 254-256, 93.9 % of respondents to our Community Survey support a Waldorf Charter School. We have also included multiple letters of support the SMCS Founding Team has received in Attachment 31, referenced on Page 257 of 265, and included excerpts from a select few of these letters of support on pages 258-260 of Part C- Written Response of our application.
  - As the Peer Review Committee has acknowledged in their comment, there is a pre-existing community of families that want and support a Waldorf education in Santa Fe. We see the existence of this community as an advantage, because it gives SMCS an interest base to build on.
  - The need, desire and support of formerly enrolled Santa Fe Waldorf School families, who are an integral part of the Santa Fe community, are important and valid and contribute to demonstrating a need for a public Waldorf school in Santa Fe.

## D. Capacity Interview

1.	<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>
Does not meet	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p><b>Our response did address both specific points. Below is our prepared, complete response read at the interview. In purple is the most important contribution the proposed school will bring to public education followed by examples of how the approach is truly unique. In bold, at the end of the text is how this contribution will be essential to the success of the proposed school.</b></p> <p>Sun Mountain Community School will follow the model of public Waldorf education, <b>bringing a truly unique approach to public education in New Mexico.</b> There are 60 public Waldorf schools in the United States, there are none in New Mexico.</p> <ul style="list-style-type: none"><li>• Our approach of providing an integrated curriculum allows students to enter into subject matter through a myriad of different types of intelligences - language, mathematical, social, musical, artistic, etc. give us a broad welcoming mat for students of different backgrounds and learning styles.</li><li>• For example, in fifth grade students develop their language arts through the study of ancient Greek history. They read books with characters from Greek city states and the children’s version of the Iliad. They research reports and write essays about the history they are learning. At the same time, however, the movement curriculum</li></ul>

teaches and practices the 5 disciplines of the original Olympic games - the Pentathlon. At the end of the school year, 5th grade students travel to an interschool Olympic games competition where all students from all the schools are mixed together to form competing city states that move through the 5 disciplines. So, the theme is Ancient Greek history and a student can enter into that theme through

- Linguistic-verbal intelligence
- Body-kinesthetic intelligence.
- Interpersonal intelligence
- 8th graders study the industrial revolution in history while they study mechanics in physics. At that time, they begin working with sewing machines in handwork.
  - visual -spatial
  - Linguistic-verbal
  - logical -mathematical
  - And body-kinesthetic

In this way, all students discover the curriculum through subject matters that they excel at as well as subject matters that challenge them. This allows students to experience themselves and each other as equal individuals with different skills and challenges. We are especially excited about this virtue of Waldorf education speaking to and attracting students from diverse backgrounds and cultures and learning styles.

The educational program integrates art into all subjects. It is a tool to process academic concepts.

- We draw to scale maps of the continents we learn about.
- We act out a story from the 4th grade mythology in a school play.
- We draw pictures of single apples, baskets of apples, and great buckets of apples to introduce place-value.
- This not only speaks to different intelligences, our uniqueness section of the application cites research that shows the emotional

	<p>engagement of art improves memory. Furthermore, it is a part of our Experiential learning process (David Kolb refers to</p> <ul style="list-style-type: none"> <li>○ Concrete experience</li> <li>○ Abstract conceptualization</li> <li>○ Active Experimentation)</li> <li>○ You feel it, you think it, you do it, and then you feel it again.</li> </ul> <p>We call this learning through the Head, Heart, and Hands, produces real world, creative problem solvers.</p> <p>Learning blocks and main lessons offer opportunities for curriculum depth.</p> <p>Emotional safety and efficiency is created through looping.</p> <p><b>These contributions will be essential to the success of the school because it speaks to those community members looking for something different in their child's education.</b></p>
<b>2.</b>	<b>How will you evaluate whether your mission and implementation of it are working?</b>
<b>Does not meet</b>	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p><b>Our response did specifically address how we would evaluate whether our mission and its implementation is working. The first line of the prepared</b></p>

**statement below is pulled directly from our mission statement, the larger picture of what our goal is - to educate the whole child. We then immediately discuss how we would evaluate that. This is what was read to the peer review team:**

Our mission is to educate the whole child, which we call the head, heart and hands. We will assess how well we are meeting the HEAD HEART & HANDS with specific and measurable assessments for each of these human components.

- The Head education is measured with academic assessments - formative assessments, block tests and interim assessments, followed by more formative assessments that respond to data from the assessments, and the yearly federal assessment.
  - The founding team, and specifically me as the interim Head of School, will create a detailed scope and sequence in the planning year, with a rubric of where we expect students to be during each of the IStation interim tests.
  - Teachers will be given clear measurable goals and timelines during their training. The HOS in the first year and after that the Pedagogical Director, will meet with the teachers to continually reflect on their progress towards the mapped goals.
  - The Board will get regular reports from the HOS on student academic progress,
- The Heart education is measured with the SEL surveys given twice a year as well as our attendance reports. We believe that when school is really meeting a child, they come to school more often and we will be assessing our attendance accordingly. Music, theater, painting, and world languages teachers are also assessing the Education of the Heart.
  - In addition, the board will receive bi-annual surveys

	<ul style="list-style-type: none"> <li>● The Education of the Hands is included in the SEL survey that inquires about the children’s determination in the face of challenges and their grit. Furthermore, movement, handwork, and woodwork teachers will also be assessing the Education of the Hands.</li> <li>● Parent surveys will be distributed and collected twice a year. and reports from the Equity Council, gathered from the parents.</li> <li>● The Board will hear reports of all SEL assessments and attendance reports. Chronic absenteeism is at 30% statewide. Sun Mountain aims to be at 15% by the end of our third year. Our stated goal in the SEL surveys is that 80-85% of students will respond favorably (a 4 or 5 in a 1-5 rubrics).</li> <li>● We will pay specific attention to trends in attendance and SEL survey results of high-risk students to determine if coming to school is a positive experience for them.</li> </ul>
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<p><b>3.</b></p>	<p><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></p>
<p><b>Approaches</b></p>	<p><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.</p> <p><b>SMCS Response:</b>  <b>Our response does include a strategic process and addresses how that process would support the success of the proposed school. Below is our response to this question:</b></p>

a). **Role of a governing body in the success of a charter school:** Primary role of the governing body is

- to be in a contractual relationship with the state.
- They provide oversight to ensure the school remains in compliance with its charter and New Mexico law.
- It does this through committees,
  - Governance and Ethics,
  - Finance,
  - School Performance, and
  - Audit.
- The Board ensures all decisions and policies of the school are aligned with the school's mission.
- Through the NM Open Meeting Act, the Board provides the public with confirmation of the Board's oversight and its adherence to the school's mission.
- The Board's responsibilities **in order to have a successful governing body** are also clear:
  - They monitor and review the school's adherence to its mission.
  - They maintain the legal compliance in all facets of the school consistent with New Mexico law
  - They hire, set employment compensation and terms, evaluate, and terminate the Head of School;
  - They oversee financial matters for the school, including approving the annual school budget as well as authorizing representatives to sign checks and legal documents on behalf of the school, including regular monitoring of internal controls.

b). **Our process for identifying and selecting members.**

Cultivation process - A strength of Waldorf education is community involvement.

- The founding team will build excitement for our school through community involvement and festivals.
- We will look within our personal networks. To ensure that we continually invite diverse ideas and perspectives, we will strive to look beyond them as well as advertising board positions on a nonprofit board job search list such as the Santa Fe Community Foundation and Groundworks.org.
- In an informal cultivation process, current board members act as models and serve as ambassadors for the mission of the school
- The Board is specifically looking for potential members with backgrounds or expertise in finance and law.

The Formal Process -

- The Board President will invite the prospective board member to an informational meeting to share more about the organization, board service and gauge interest.
- The Governance and Ethics Committee will vet the candidate and then, if they believe the candidate is qualified, they will propose them to the full board for a vote.
- Every new board member will understand the required, mandatory hours of training offered by the state.

**c). (How will this process support the success of your proposed school?)**

The proposed school will succeed by having an excellent and highly skilled HOS, who will in turn hire and hold accountable highly skilled and competent teachers and administrators that work as a team to create and maintain an excellent school. The Board ensures this by hiring and holding accountable the HOS to leading the school in alignment with the School's mission. The Board's membership reflecting diversity, fiscal expertise, and professionalism will result in an organism that performs its oversight mission well at all times.

<p>4.</p>	<p><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></p>
<p><b>Approaches</b></p>	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p>There is not any lack of clarity here. Our application specifically states that “hiring candidates for all positions except for the Head Of School will be the responsibility of the Head Of School, supported by the Leadership Team” on Page 190 of 265 of PArt C - Written Response. The following is the prepared statement that was read. The text in purple is for emphasis. Please review what is unclear.</p> <p>a). <b>What role does the school leader play in the success of a charter school?</b></p> <ul style="list-style-type: none"> <li>● The HoS’s responsibility is to implement SMCS’s strategic plan and vision in accordance with its mission and Philosophy.</li> <li>● They are being directed and reviewed by the Board as they do this.</li> <li>● The HoS works in collaboration with other School departments and leadership, as outlined by the school’s governing policies. <ul style="list-style-type: none"> <li>○ The Leadership Team: Special Education Director and Pedagogical Director (for academic oversight);</li> </ul> </li> </ul>

- The Oversight/Advisory Teams: Equity Council, School board, and Advisory council (strategic planning oversight); and
- The Operations Team including the Operations Director/Coordinator and the Office Administrator (enrollment and operations oversight).

- The HoS is responsible for hiring and dismissal of all staff and faculty as well as HR and grievance policy oversight.

- As communication liaison between the School board and staff, the HOS will attend Board meetings and maintain ex-officio status. They will inform the board about the operational, academic, legal and financial well-being of the school with regular reports from each department.

- They will fulfill all Federal, State, and Local reporting requirements

- Develop and implement administrative policies and procedures for the School.

- Attend professional development workshops with a commitment to learning about:

- Waldorf inspired leadership;
- charter school management and governance; and
- leadership in areas of diversity, equity, inclusion, and justice

b). Describe your strategic process for identifying and selecting her/him.

- Our first step after approval is completing the steps to become an 'Approved Board of Finance', and

- electing Board officers and

- the Hiring Committee.

- The HOS search will begin immediately with the goal of completing a hire by November 30.

- The Board will adopt the calendar proposed in our application to guide the process towards that goal date.

- We will list the position, assuring Equitable Advertising, in

- state newspapers,
- online job boards such as Groundworks New Mexico,

	<ul style="list-style-type: none"> <li>■ Waldorf specific job boards (many professionals move to work at a Waldorf school).</li> <li>○ The Hiring Committee will personally reach out to a few potential candidates in the community.</li> <li>○ They will receive resumes, communicating with applicants as is needed, verify and vet experience, and discuss viable applicants.</li> <li>○ They will conduct 2 rounds of interviews, share information, and offer the position, after a full board vote.</li> </ul> <p>c). <b>How will this process support the success of your proposed school?</b> The clearly delineated roles, responsibilities, and oversight of the Board as well as our comprehensive plan to acquire this highly qualified individual will support the success of this charter.</p> <ul style="list-style-type: none"> <li>● Waldorf core principal #4 states: Public Waldorf schools foster a culture of healthy relationships.</li> <li>● Public Waldorf core principle # 6: School leadership is conducted through shared responsibilities within established legal structures.</li> <li>● Clear roles and responsibilities allow the persons filling those positions to dedicate themselves fully and confidently to their work.</li> <li>● It also ensures a fair and equitable process for both parties.</li> <li>● The Leadership Team will allow work to be shared with employees' expertise and ensure that a single person is not required to carry every department, while making very clear all decision making responsibilities.</li> </ul>
<p>5.</p>	<p><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></p>

<p><b>Does not meet</b></p>	<p><b>Independent Review Team Comments:</b></p> <p>The applicant team did not clearly address the questions stated above. A description of an unconventional evaluation process was described.</p> <p>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.</p> <p><b>SMCS Response:</b></p> <p>Our model does propose that the Pedagogical Director evaluates all teaching faculty. We realize this may be unique to Waldorf Pedagogy but we maintain that this is best practice as it pertains to SMCS’s organizational structure. The Pedagogical Director is hired as the deliberate head of the Waldorf pedagogy and the Common Core Standards so they will be most qualified to assess if someone is delivering the curriculum or not. When, in our model, we are merging the Waldorf curriculum to align with the CCSS, this person's role is vast and essential. As stated in our Organizational Structure, page 172-177 of the application, the Pedagogical Director works in partnership with the Head of School as a part of the Leadership Team in matters relating to faculty cooperation, hiring and discipline. The intention is to distribute roles across the Leadership team so that the HoS is not overwhelmed by being solely responsible for all school functions. In addition, Appendix B - Head of School Job Description and Appendix C - Staff Job Descriptions, clearly delineate which positions report to who and who supervises which specific positions.</p> <p>Our evaluation plan is aligned to our job descriptions and to our Organizational Charts as shown on Pages 173-175 of 265 of Part C- Written Response of our application. Below is our response in written form.</p> <p>a). <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?</b></p>
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- The Public Waldorf Core Principal #7 states that Public Waldorf schools cultivate a love of lifelong learning and self-knowledge so, in addition to relative state statutes, it is understood that a Waldorf-inspired school will practice reflection, self-evaluations and responding education. At Sun Mtn Community School, this process will begin with the School Board and that process will be repeated throughout the school.
- Board self-evaluations will occur yearly, formally taking stock of success and failures and its ability to adhere to or to become aware if it has strayed from the mission of the school.
- This will be done through self-reflection as well as community wide input. Five subgroups will constitute the “community” and feedback will be acquired through surveys:
  - 1.) parents/students (in collaboration),
  - 2) staff,
  - 3) teachers,
  - 4) administrators, and
  - 5) school board and equity council members.
- These surveys will close mid-year, allowing the Board time to use the results to develop priorities for the coming academic year as well as determine any future training needs.

This process not only requires that the Board keep developing their skills of leadership, it allows community members from the 5 sub-groups a voice in the governance of the school, and does not permit unhealthy issues to fester or go dormant until they are emergencies. The evaluations, goal-setting and training opportunities that flow from this evaluation process will assure continuous improvement is knitted into the fabric of the charter school, starting with its Governing Board but continues throughout the school community.

- The HOS will be evaluated once a year by the school board.

	<ul style="list-style-type: none"> <li>● Teachers, each year, will go through a process of self-reflection, review, and decision process for further training with the Pedagogical Director.</li> <li>● The Council of Teachers is evaluating the curriculum. continually study the pedagogy and review the curriculum and student success and overall campus contentment.</li> <li>● Teachers, with the support of the Pedagogical Director and the Special Education Director, continually conduct formative and summative assessment of students, review data collected, and reflect on their teaching strategies accordingly.</li> </ul> <p>This high quality process of evaluation, part of public Waldorf education's core principles, undoubtedly supports the success of the school. The dedication to our mission is refreshed regularly. Successes are noted and appreciated. Difficult issues are faced with support and a clear process.</p>
6.	<p><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></p>
Does not meet	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p><b>Our response is complete. Below is the prepared statement read, in purple is how the relationships would evolve to ensure the success of the charter school:</b></p>

a). After charter approval, the Founding Team will break off like roots, become the building blocks of the different councils and positions needed to form the school while avoiding the creation of conflicts of interest as the various bodies of the school are formed. Jayita Sahni will be acting Board president until the full Board is formed and a president can be voted in. At that time, Ms. Sahni and Ms. Wireman will continue to serve on the school board. As an initial matter, Ms. Sahni will oversee the process of the governing body becoming an approved Board of Finance as quickly as possible in Fall 2024. Zoe Wilcox will act as Interim Head of School until the permanent HOS is determined. Her priorities will be:

- Create a plan and calendar of Funding Sources Application Deadlines. These include but are not limited to:
  - Title 1
  - Title 2
  - Title 3
  - Outdoor Equity Fund
  - Outdoor Learning Start-up Grant (if applicable)
  - Fine Arts Education Act application
  - Charter School Venture Fund
  - New School Venture Fund
  - HUD funding
  - Waldorf specific funding sources
- I will use the applications student recruitment and outreach calendar to implement the recruitment plan.
- Plan and create calendar for teacher hiring
- Begin scope and sequence with core curriculum standards included and a relative expectation of correlating IStation/iMSSA testing scores
- I will begin creating an all school curriculum calendar, festivals, plays, camping trips
- Solidify contract with Operations Coordinator

	<p>Briana Bassler will assist in the formation of the proposed Supporting Foundation. We will start to form our Equity and Advisory Council through community outreach.</p> <p>By the end of the Planning Year, the Founders will have settled into new roles on the governing board, as teachers/administrators at the school, on a supporting foundation or on the Advisory or Equity Council.</p> <p><b>b). These relationships evolve to ensure the success of the school by taking our comprehensive knowledge cultivated through the application process, and our trainings, into different circles with more community members who believe in the school mission and find their place in its actualization.</b></p>
<p>7.</p>	<p><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></p>
<p><b>Approaches</b></p>	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p><b>It is unclear why this answer does not meet the standards of the question.</b></p> <p><b>Below is what was read:</b></p> <ul style="list-style-type: none"> <li>● The by-laws outline the structure of the board and how it will operate so that there is clarity of roles, duties and mission, and statutory compliance.</li> <li>● Bylaws will be voted on/adopted by the School Board at its first meeting in Fall 2024</li> </ul>

	<ul style="list-style-type: none"> <li>● The by-laws stipulate membership requirements and terms, required committee structures, duties and responsibilities including training and time commitments, meeting and voting structures.</li> <li>● Onboarding and orientation processes are laid out, including required state training, and provide for members to learn and become familiar with the Bylaws. Once on board, [a new member] will have an initial meeting with the Board president to go over bylaws.</li> <li>● The Board's Self-Evaluation process requires it to evaluate how well it complied with the bylaws.</li> <li>● Appendix A - our proposed Bylaws written by our in-house legal counsel (Ms. Bassler) with counsel from an outside educational law attorney (i.e. Patty Matthews)</li> <li>● Attachment 25 - our proposed 'Personnel Handbook'</li> </ul> <p>These clearly delineated and legally sound expectations ensure board members and staff are clear on their duties, properly trained to perform them, and equipped with timelines and a built-in self-evaluation process to assess their success and shortcomings.</p>
8.	<p><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></p>
<b>Does not meet</b>	<p><b>Independent Review Team Comments:</b></p> <p>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</p>

mission-aligned, the independent review team suggests that the legal council review all policies before implementation.

**SMCS Response:**

**The Founding Team would like an explanation of how a strong focus on making sure “persons for whom (a) policy is intended knows and understands that policy” is a negative response to well implemented, current, and effective policies? In addition, as acknowledged by the Peer Review Committee in the previous question, our legal expert, who is an attorney, and who was present at the Capacity Interview, was involved in the drafting of our policies. Please read our response to see how the process includes: proper onboarding, evaluating, and reflecting on feedback leads to evolution of policies and practices. This is what was read:**

The first step to having compliant, well implemented and effective policies and procedures is that the person for whom the policy is intended knows and understands that policy. And they understand how it is intended to serve them and the best interests of the school.

The Founding Team intends to make thorough onboarding, and robust self-evaluations the culture of the school, beginning with the Board. This culture will include a commitment to introducing policies in an effective and timely manner and reviewing them regularly. the school will both insist on knowledge and compliance of policies, and reflect upon feedback to inform when a given policy or practice needs to evolve.

Here is a brief outline of our methods:

- The Board president will meet with each new board member to go over the by-laws together, to share current board goals and issues they may be working with at the time.
- The Board undergoes a yearly self evaluation.

	<ul style="list-style-type: none"> <li>● All new employees will review the job expectations and Personnel Handbook with the Operations Director/Head of School and will sign a Job Description as well as an acknowledgement that the employee has received the Personnel Handbook. This will include an understanding of the grievance policy. All or parts of the Personnel Handbook will be reviewed each year during in-service training.</li> <li>● Faculty will participate in a yearly Elevate NM teacher Evaluation (by NMPED).</li> <li>● The Teacher’s Council members will learn the roles and responsibilities of the Council and they will provide oversight for the curriculum and observe and provide reflections on potential hires and mentor selection.</li> <li>● The Equity Council and Advisory Committee will have onboarding and reviews.</li> <li>● Community members who come on field trips or present to a class sign a letter clearly stating their expected behavior when interacting with the children.</li> <li>● Academic, organizational, and financial reports will flow to the HOS for oversight and then the HOS will bring these reports to the Board.</li> <li>● The Head of School will undergo a yearly evaluation process from the Board.</li> </ul> <p>All these levels of evaluation shine light on things that are not working well, and the need for improvement - a new idea or approach, or further education to deal with a problem. When evolution is part of the culture of the school and rigidity is cautioned, acting on set-backs becomes the norm.</p>
<p>9.</p>	<p><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</b></p>

	<b>school? Please include details about locating, securing, and funding the facility.</b>
<b>Approaches</b>	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p>The SMCS Founding team is confident that the former SFWS lower school facilities located at 26 Puesta Del Sol, Santa Fe, NM 87508 can serve as the SMCS facilities. We have reviewed NMAC 6.27.30 Statewide Adequacy Standards and visited the campus and the buildings. Based on our preliminary assessment, the fact that the campus has been a functioning school until August 2023, that SFWS has continued to perform adequate maintenance on the campus beyond their closure, and that they have had regular fire inspections with the most recent one occurring in early June 2024, we believe that the campus and buildings are in reasonable condition to serve the purposes of SMCS. Please refer to the Appendix E FMP Checklist included in our application for further details regarding our Facilities Plan specific to this campus.</p> <p>The SMCS Founding Team has been in regular conversations with the SFWS Board of Trustees throughout our application process. They are very supportive of the efforts of the SMCS Founding Team and of leasing the former SFWS facilities to SMCS. Post authorization, the SMCS Founding Team will formalize a MOU establishing an intent to lease the campus. Once formed, the SMCS School Board will negotiate a lease agreement with the SFWS Board of Trustees. As soon as the lease agreement is signed, SMCS will schedule a site visit with PSFA following which, we will schedule any follow up inspections necessary.</p>

	<p>Acting Board President, Jayita Sahni, and Interim HOS, Zoe Wilcox, will lead the lease negotiation efforts until the SMCS School Board is officially formed. At that point. Acting Board President, Jayita Sahni, along with the support of fellow board members will take over the process. Since Ms. Sahni will be involved in the facilities acquisition process from the beginning, we believe this transition will be smooth.</p> <p>SMCS anticipates funding the lease for the facilities through SEG operational funds and State lease assistance monies.</p>
<p>10.</p>	<p><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></p>
<p><b>Does not meet</b></p>	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p>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.</p> <p><b>SMCS Response:</b></p> <p><b>The Founding Team stated that working with a realtor to find an alternative facility is our next step plan. Below is the prepared response to this question.</b></p> <p>The SMCS Founding Team is confident that we have found our facility. Our efforts will primarily focus on securing the facility we have found. If, during the process of our lease negotiations, we find that we are unable to secure our</p>

	<p>preferred facility due to unforeseen reasons, we will work with a local realtor to find an alternate facility.</p>
<p>11.</p>	<p><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></p>
<p><b>Approaches</b></p>	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p><b>This is what was read from in the interview, including our specific plan:</b></p> <ul style="list-style-type: none"> <li>● First, we wrote the application as if we did not receive the CSP grant and our budget reflects that. We referenced that we would be applying for the grant but purposefully kept it separate.</li> <li>● We will continue to reach out to Waldorf specific foundations and organizations for potential seed funding.</li> <li>● The proposed Supporting Foundation may also be able to provide SMCS with seed money or in-kind support for the implementation year.</li> <li>● We have also reached out to the Daniels Fund and are actively working on other grant funding.</li> </ul> <p><b>c). We have a multi-step plan ready to fall back on if do not get funding to still acquire what is necessary to begin a school</b></p> <ul style="list-style-type: none"> <li>● We are already working closely with the proposed lessor. They are committed to staying flexible with us until funds can be secured. We will negotiate with the lessor to borrow desks and chairs and basic supplies for the first year.</li> <li>● We would not be able to offer transportation in the first year without the CSP grant.</li> <li>● We have identified a bank that works with public entities that we will work with</li> </ul>

	<ul style="list-style-type: none"> <li>We will obtain the best value for products and services by utilizing a competitive RFP process for goods and services or utilize vendors on existing price agreements, depending on budget and/or schedule priorities</li> </ul> <p>Both the founding team and the community at large are incredibly committed and motivated to realize the SMCS. We are a community of competent problem solvers, dedicated to seeing this through.</p>
<b>12.</b>	<p><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></p>
<b>Approaches</b>	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p>As the Peer Review Committee has acknowledged previously, there is a pre-existing community of families that want and support a Waldorf education in Santa Fe. We do not see the “numerous Waldorf students with an expressed interest in returning to a Waldorf-inspired school” as a drawback. Instead the existence of this community is an advantage, because it gives SMCS an interest base to build on.</p>
<b>13.</b>	<p><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></p>
<b>Does not meet</b>	<p><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.</p>

**SMCS Response:**

**Below is the prepared statement for this question, read at the interview. It was written in bullet points to list specific actions. Please note the purple font that points the peer reviewers to our recruitment timeline. There, three dates are given for creating a corrective action plan, implementing it, and reviewing it.**

- We have used a conservative enrollment projection of 75% of our enrollment cap for our first year of operations, based on the enrollment numbers of recently opened charter schools in our area. We know specifically how many students we need in each grade throughout our growth plan.
- To meet those goal numbers The founding team will continue with our outreach activities started during the application phase and build on the relationships we have already cultivated, with an early focus on recruitment by notifying our community of our school, mission and enrollment calendar.
- We will work with community partners to expand our recruitment efforts
- Currently our contact list includes numerous former Waldorf students with an expressed interest in returning to a Waldorf school.
- We will work on expanding our contact list with a particular focus on families with school age children in grades K-4.
- A priority of HOS, once hired, will be recruitment
- **Our recruitment and enrollment calendar on Page 211 on our application speaks to the specifics of our recruitment timeline and any corrective action needed.**
- We will work with the existing SFW Community Council to celebrate seasonal festivals on campus with community participation to build interest in Waldorf education and our school
- We will offer campus open houses to build understandings and community interest in Waldorf education and our school

	<ul style="list-style-type: none"> <li>● It is our intention to build a sustained and focused recruitment campaign to ensure that we meet and/or exceed our minimum projected enrollment numbers at the 40 day count</li> </ul>
<p style="text-align: center;"><b>14.</b></p>	<p style="text-align: center;"><b>Describe the organizational steps the proposed school will take during the planning year to be ready for opening?</b></p>
<p style="text-align: center;"><b>Does not meet</b></p>	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p><b>Our response includes a step-by-step outline of all organizational steps. Here is what was read from in our interview:</b></p> <ul style="list-style-type: none"> <li>● Complete the Approved Board of Finance process. Review and approve by-laws. Elect officers and form committees. Attend Board Trainings. Begin the process to hire a Head of School and negotiate a lease for our school facilities.</li> <li>● Interim HOS - organization of calendars. <ul style="list-style-type: none"> <li>○ Recruitment calendar</li> <li>○ Scope and sequence</li> <li>○ All inclusive school calendar</li> <li>○ Hiring calendar</li> <li>○ Additional funding application calendar</li> </ul> </li> <li>● Implement recruitment and outreach calendar.</li> </ul> <p>Our application includes a timeline for the</p> <ul style="list-style-type: none"> <li>● HOS <ul style="list-style-type: none"> <li>○ Assess and take on the calendars created by interim HOS.</li> <li>○ Prioritize outreach and recruitment efforts - the timeline is on page 211, II.G.(1).</li> <li>○ Work with Board to solidify the budget</li> <li>○ Begin hiring essential faculty and staff</li> </ul> </li> <li>● The Board calendar (pg 165, II.C.(1)) Once chooses a HOS, they will begin creating the year's goals.</li> </ul>

<p style="text-align: center;"><b>15.</b></p>	<p><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></p>
<p><b>Approaches</b></p>	<p><b>Independent Review Team Comments:</b> The applicant team did not fully articulate how the delineation of roles and responsibilities were approached.</p>
<p style="text-align: center;"><b>16.</b></p>	<p><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></p>
<p><b>Does not meet</b></p>	<p><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.</p> <p><b>SMCS Response:</b> The Interim HoS clearly stated that the answer to what is included in the "work of Rudolf Steiner" that is not included within the Core Principles from the Alliance for Public Waldorf Education was, "Nothing." The Founding Team did have confusion because the peer reviewers seemed to be indicating that there was a hidden agenda not included in our application but they would not directly express what they thought we might not be upfront about. This was baffling to the Founding Team because the question was implicit and we can't even imagine what the peer reviewers were hinting at. <b>SMCS clearly stated</b></p>

	<p>that the “work of Rudolf Steiner” was summarized in the Seven Practices of Waldorf Education Education explained in our application. In addition we unequivocally stated that the Developmental Method and Whole Child Education is what is meant by “the work of Rudolph Steiner” when that phrase was used in our application. We clarified that “Anthroposophy” is defined as the study of Rudolf Steiner’s Developmental Method. Our Application relies heavily (and solely) on the principles of Public Waldorf Education elaborated on, referenced, and described at length in the Application.</p>
<p>17.</p>	<p><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></p>
<p><b>Does not meet</b></p>	<p><b>Independent Review Team Comments:</b></p> <p>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.</p> <p><b>SMCS Response:</b></p> <p>Contrary to the comments of the Peer Review Committee, neither SMCS nor Waldorf education in general have “a philosophy that essentially withholds the explicit teaching of reading to children in Primary grades”. This indicates that the Peer Review Committee has a fundamental misunderstanding about Waldorf education. Nothing in our application or our Capacity Interview supports this assertion. Ms. Wilcox stated unequivocally that if the choice was to follow Waldorf tradition or follow New Mexico law, they would always follow New Mexico law. SMCS stated their understanding that as a public charter school, this is the obvious and only answer. This reiterates what is in our application on page 58 of 265, “After these foundational language skills are taught, reading is taught using structured literacy and explicit instruction of decoding and encoding of the English language. This method is most</p>

	<p>universally effective, bridging effortless readers and students with dyslexia and disabilities, and English language learners (Coppola, 2003). We use Roadmap to Literacy as our curriculum in reading.” <i>As is stated over and over in this application process, we will adapt Waldorf educational programs to CCSS.</i></p>
<p>18.</p>	<p><b>How will you enroll students 2 grades above what you served the previous year?</b></p>
<p>Does not meet</p>	<p><b>Independent Review Team Comments:</b></p> <p>The applicant team’s response did not match what was stated in the charter application narrative.</p> <p><b>SMCS Response:</b></p> <p>In our 2nd Year of Operations SMCS would serve K-6th grades. The “2 grades above what you served the previous year” refers to 5th and 6th grades which is 2 grades above the K-4th grades we would serve in our previous year. Since the Peer Review Committee’s question was specific to “enrollment” Our response to this question outlined our enrollment process through the lottery system for Year 2 of Operations. SMCS stated that all of the 6th grade spots would be offered up in the lottery. For 5th grade, the rising class from the previous year’s 4th grade would be offered the chance to register first, then any remaining seats that were not taken up by the previous year’s 4th grade class would be offered up in the lottery enrollment process. <u>This is exactly what is described in our application in Section II.G.2 ‘Lottery Admission Process’ on pages 213-215 of 265 of Part C - Written Response of our application.</u> SMCS would also like to point out that it is not uncommon for new schools to open with fewer grades in their first year and add more than just a single grade in the following year(s). In addition, as stated in the interview, Santa Fe has a paucity of public educational options in the middle grades, and unmet demand for high quality grade 6-8 options will assist in making the two-grade jump a success.</p>

<p style="text-align: center;"><b>19.</b></p>	<p><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></p>
<p><b>Does not meet</b></p>	<p><b>Independent Review Team Comments:</b></p> <p>The applicant team did not demonstrate knowledge of what is required from either the audit committee or the finance committee.</p> <p><b>SMCS Response:</b></p> <p>The Applicant Team refutes this comment. The team’s legal expert summarized the process outlined in the New Mexico statutes and the administrative code (NMAC) and as set out in detail in our response to Section II.A.1 under ‘Committee Structure’ on Page 152 of 265 and under ‘Committee Details’ on Pages 153-154 of 265 of Part C - Written Response of our application. The Finance and Audit Committees have distinct roles in the Board’s governance and oversight functions. SMCS’ response to this question at our Capacity Interview is summarized as follows: We provided a high level outline of the Audit Committee including the statutory requirements to audit and provide essential information for overseeing and improving the school's financial and operational practices. The Audit Committee reviews the audit findings and develops proactive measures to ensure the school operates efficiently, remains compliant with regulations, and is financially healthy, thereby supporting its educational mission. In addition, the Finance Committee develops and monitors the annual budget (via regular reviews and variance analysis), ensuring financial performance aligns with the school's mission/goals. It manages cash flow, prioritizes resource allocation, and ensures compliance with laws/regulations, and prepares for audits and communicates financial information transparently to stakeholders.</p>
<p style="text-align: center;"><b>20.</b></p>	<p><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></p>

<p><b>Does not meet</b></p>	<p><b>Independent Review Team Comments:</b></p> <p>The applicant team did not fully address the question or provide the percentage of respondents that were Waldorf families.</p> <p><b>SMCS Response:</b></p> <p><b>We are proposing a Waldorf-inspired public school for our Santa Fe community, not for the former Santa Fe Waldorf School community.</b></p> <p>In our response we stated that 100% of the people we spoke to at our three outreach booths at the Southside Library, at the Genoveva Chavez Center and at the Santa Fe Farmers Market were <u>not</u> previously enrolled at the Santa Fe Waldorf School.</p> <p>Our survey distribution extended far beyond the former Santa Fe Waldorf School Community as detailed in Section IV.A Outreach Activities on page 246 of 265 in our application under the heading “Community Survey”. The Peer Review Committee found that this section “meets expectations”.</p> <p>SMCS would like to reiterate that the pre-existing community of families that want and support a Waldorf education in Santa Fe is an advantage, because it gives SMCS an interest base to build on. The need, desire and support of formerly enrolled Santa Fe Waldorf School families, who are an integral part of the Santa Fe community, are important and valid and contribute to demonstrating a need for a public Waldorf school in Santa Fe.</p> <p>While we did not ask in our survey if families had been enrolled in the Santa Fe Waldorf School or not:</p> <p>As cited on page 13 of 265 of Part C - Written Response of our application, 73% of those surveyed <u>would not send their child to a private Waldorf school</u>, which indicates <i>at least</i> 27% of those surveyed did not attend the former SFWS.</p> <p>More importantly, also cited on page 13 of 265, 93.9% of all those surveyed <u>would send their child to a tuition-free public Waldorf charter school</u>, indicating broad community support for a Waldorf-inspired community charter in Santa Fe.</p>
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