

STAFF ANALYSIS, RECOMMENDATIONS, AND PROPOSED FINDINGS OF FACT REGARDING REVIEW OF ESCUELA POPULAR CENTER FOR TRAINING AND CAREERS, FAMILY LEARNING CHARTER SCHOOL RENEWAL APPEAL PETITION

JULY 15, 2026 (Posted JUNE 30, 2026)

Escuela Popular Center for Training and Careers, Family Learning Charter School (EPCTC) seeks approval of the renewal of its independent, direct-funded charter school serving students in grades 9-12 on appeal from East Side Union High School District (ESUHSD). EPCTC was initially approved by ESUHSD in 2004 to serve students in grades 9-12 and ages 18 and above who no longer qualify to attend its sister school, Escuela Popular Accelerated Family Learning Center (EPAFLC), which serves students TK-12. ESUHSD denied renewal for EPCTC on April 13, 2026. EPCTC's current term expires June 30, 2026, as it was extended by operation of law due to COVID-19. EPCTC has requested renewal for a term of five years from July 2026 through June 2031, due to its designation by the California Department of Education (CDE) as a school in the Dashboard Alternative School Status (DASS) school. Should the renewal appeal be granted, EPCTC would change authorizers. EPCTC, located within the ESUHSD boundaries, currently serves approximately 420 students.

PROCEDURAL STATUS

The Charter Schools Department of the Santa Clara County Office of Education (County Office of Education or SCCOE) received a charter renewal appeal petition (Renewal Appeal Petition or Charter) from EPCTC on April 23, 2026. EPCTC is operated and governed by Escuela Popular Del Pueblo (EP).¹ *Education Code (EC)* Sections 47607 and 47607.2 determine the length for traditional, or non-alternative, schools based on a school's placement in a high, middle, or low performance category, unless the school is Dashboard Alternative School Status (DASS). EPCTC is a DASS school and its own Local Education Agency (LEA) as it has its own County, District, School (CDS) code assigned by the California Department of Education (CDE), charter number, and charter. Thus, school performance and growth are measured by the California School Dashboard indicators as well as other alternative metrics applicable to the population served by the school (see additional details below). The renewal term for a DASS school is up to five years. If the charter is renewed by the Santa Clara County Board of Education (SCCBOE or County Board of Education²), the new term of the Charter would begin on July 1, 2026, and run through and including June 30, 2031, and SCCBOE would become the authorizer for EPCTC. Renewals of district appeal charters are governed by the standards and criteria set forth in *EC* Sections 47605, 47607 and 47607.2.

On May 20, 2026, the SCCBOE held a public hearing on the EPCTC Renewal Appeal Petition in accordance with the requirement to do so within 60 days of receiving the Renewal Appeal Petition. On May 22, May 26, and May 27, 2026, SCCOE Staff conducted a renewal site visit and held renewal interviews with EPCTC families, students, staff, board members, and representatives of EP leadership as the charter management organization or network.

¹ Throughout this document, Escuela Popular Del Pueblo may be referred to for purposes of convenience as "EP," but the Escuela Popular Center for Training and Careers, Family Learning Charter School (EPCTC) and Escuela Popular Del Pueblo may be referred to collectively, separately, or interchangeably as "Escuela Popular" or "EP" or "EPCTC" or "Charter School" or "school."

² Throughout this document, references to "SCCBOE" or the "County Board of Education" are specifically to the Santa Clara County Board of Education. However, for purposes of convenience, the Santa Clara County Board of Education, the Santa Clara County Superintendent of Schools, and the Santa Clara County Office of Education may be collectively or separately referred to herein as "SCCOE."

Pursuant to EC Sections 47607, 47607.2 and 47605, the County Board of Education has 90 days from receipt of the renewal application to act, which may be extended by an additional 30 days by mutual agreement. SCCBOE will hold the decision hearing July 15, 2026, to act on the EPCTC appeal request for renewal.

In accordance with Board Policy 0420.4, SCCOE provided EPCTC and EP a Memorandum of Understanding (MOU) on April 23, 2026, with the understanding that the MOU would be executed by EPCTC and EP by June 30, 2026, as EPCTC and EP's acceptance of the MOU also impacts the renewal recommendations. The MOU governs the respective fiscal, operational, and administrative responsibilities, legal relationships, and other matters not otherwise addressed or resolved by the terms of the Charter, pending any further direction or recommendations by the SCCBOE, including SCCBOE's adoption of the findings and recommendations set forth herein. On June 22, 2026, EPCTC and EP executed the MOU.

The complete Renewal Appeal Petition on which the SCCBOE is acting is attached to the agenda item in Board Docs and is also available for review at the following location: https://sccoe.to/EPCTC_Appeal

CRITERIA FOR RENEWAL OF A CHARTER PETITION

Effective July 1, 2020, the legal standards for determining whether a charter petition should be renewed were updated. EC Section 47607(b) specifies that charter renewals "are governed by the standards and criteria described in Section 47605, and shall include, but not be limited to, a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed."

Pursuant to EC Section 47605, an appeal renewal charter petition may be denied on the basis of written factual findings that support one or more of the following:

1. The charter school presents an unsound educational program for the pupils to be enrolled in the charter school.
2. The petitioners are demonstrably unlikely to successfully implement the program set forth in the petition.
3. The petition does not contain an affirmation of each of the conditions required by statute.
4. The petition does not contain a reasonably comprehensive description of all the required elements.
5. The petition does not contain a declaration of whether the charter school shall be deemed the exclusive public employer of the employees of the charter school for purposes of the Educational Employment Relations Act (EERA).

There are additional bases on which material revision may be denied, which are not pertinent to the current Charter.

As an "additional criterion" for determining whether a charter should be renewed, the chartering authority is required to consider the charter school's performance on the state and local indicators included in the California School Dashboard. For this purpose, charter schools are now divided into high, middle, and low performance categories, plus Dashboard Alternative Status Schools ("DASS"), based on their performance during the two consecutive years immediately preceding the renewal decision. The pertinent renewal standards and the available length of the renewal term are dependent on this categorization. (EC Section 47607 and 47607.2.)

Dashboard Alternative Status School (DASS):

Any school that serves high risk students in an alternative setting may request from the California Department of Education (CDE) to be identified as a DASS school. The renewal criteria and considerations applicable to the High, Middle, or Low performance categories do not apply to DASS charter schools. Rather, in deciding whether to renew a DASS school's charter, the chartering authority is to consider the

charter school's performance on the Dashboard plus the school's "performance on alternative metrics applicable to the charter school based on the pupil population served." The DASS charter school and the chartering authority will work together to establish the appropriate alternative renewal metrics during the first year of the charter term. Renewal of a DASS charter school on the basis of this performance may be denied only if the chartering authority makes specific written factual findings that closure of the charter school is in the best interest of pupils. DASS schools are eligible for up to a 5-year renewal term.

Also, a chartering authority may deny renewal of a charter school in any of the performance categories if it finds the school is demonstrably unlikely to successfully implement the program due to any of the following:

- a. Substantial fiscal factors,*
- b. Substantial governance factors, or*
- c. The charter school does not serve all pupils who wish to attend.*

In such cases, the chartering authority must provide the charter school with at least 30 days' notice of the alleged violation(s) and provide the charter school with a reasonable opportunity to cure the violation(s), including a corrective action plan proposed by the charter school. Pursuant to *EC Section 47607(e)*, the County Board of Education may then deny renewal on these bases only if it makes either of the following findings:

- a. The corrective action proposed by the charter school has been unsuccessful*
- b. The violations are sufficiently severe and pervasive as to render a corrective action plan unviable*

DETERMINATION CRITERIA FOR RENEWAL OF EPCTC

As stated above, CDE has designated EPCTC as a DASS school for purposes of this renewal. In its Renewal Appeal Petition, EPCTC states it meets the minimum required academic performance standards, and its academic performance supports Charter renewal. To assess its academic performance against the criteria for DASS charter schools, EPCTC submitted data from the California Assessment of Student Performance and Progress ("CAASPP") and the California School Dashboard, as well as data demonstrating EPCTC's post-secondary progress. EPCTC states the data submitted on pages 8 through 33 of the Renewal Appeal Petition is evidence of EPCTC meeting the criteria for charter renewal. CSD Staff has not reproduced all the information provided by EPCTC in this Staff Analysis and Proposed Findings of Fact but incorporates it and the CAASPP data herein by this reference.

The SCCBOE requested from EPCTC additional data and information in response to questions asked during the public hearing on May 20, 2026. EPCTC provided responses to the questions during the hearing and provided other documentation requested by the CSD.

The data below represents key data provided by EPCTC and/or available for consideration of EPCTC's academic performance.

DASS School per the California Department of Education

EPCTC obtained CDE designation as a DASS school and is on CDE's list of DASS schools, so is not subject to the High, Middle, or Low Performing category criteria. EPCTC must utilize the alternative metrics agreed upon with ESUHSD to establish its renewal criteria. These alternative metrics include: attendance rate status, growth on local assessments in English Language Arts and Math, graduation rates, participation rates on school climate surveys, credit completion, and increasing the number of enrolled long-term students.

School Academics

California School Dashboard Data

In 2017, the State of California instituted the California School Dashboard (<https://www.caschooldashboard.org/>) to help parents and educators identify strengths and areas for improvement. The Dashboard reports how districts, schools (including charter and DASS schools), and student groups are performing across state and local measures. Due to COVID, no Dashboard data is available for 2019-20 or 2020-21. For state measures, performance is based on two factors: (1) current year results, or Status; and (2) whether results improved or declined from the prior year, or Change. Performance on state measures, using comparable statewide data, is represented by one of five colors with Red being the lowest and Blue being the highest (see Object 1 below). A performance level, or color is not provided on the Dashboard when a student group has fewer than 30 students. However, the Status and Change data will be displayed. Further, when a student group has fewer than 11 students, the group does not receive a performance level (color), and the group’s Status and Change are not displayed to protect the anonymity of the students. This information is represented by using a grey color gauge with the words “No Performance Color.” Also included on the 2025 Dashboard was a growth indicator. However, for EPCTC, as the school is a high school and only 11th grade is tested at high school, no growth indicators are available.

Object 1: California Dashboard Performance Color Chart



The following data is based on 2024 and 2025 Dashboard data which shows the performance level colors, or the Status from 2024-25, and the Change, or the difference (growth or decline), from 2023-24.

Object 2: EPCTC Performance on 2025 California School Dashboard

	English Language Arts		Mathematics		ELPI		Grad Rate		College/ Career		Suspension	
	Rate	Level	Rate	Level	Rate	Level	Rate	Level	Rate	Level	Rate	Level
All Students	*	NPC	*	NPC	7.8%	RED	2.2%	RED	0.8%	RED	0%	BLUE
Hispanic/Latino	*	NPC	*	NPC			2.2%	RED	0.8%	RED	0%	BLUE
Homeless	*	NPC	*	NPC			3.4%	RED	1.0%	RED	0%	BLUE
English Learners (EL)	*	NPC	*	NPC			3.8%	RED	0.6%	RED	0%	BLUE
Socioeconomically Disadvantaged (SED)	*	NPC	*	NPC			2.4%	RED	1.0%	RED	0%	BLUE

*No performance color (NPC) given for groups of less than 30 students. Status rates are not given for groups of less than 11 students.
Data retrieved from: <https://www.caschooldashboard.org>

In 2024-25, EPCTC did not receive a Distance from Standard (DFS) score in ELA or Math as there were fewer than 30 students who took the CAASPP in 11th grade. EPCTC decreased 4.2 percentage points from the prior year and

received Red on the English Learner Progress Indicator (ELPI). Graduation rate was also only 2.2% and only 0.8% were college and career ready, with both indicators as Red.

Object 3: 2024 and 2025 California School Dashboard Student Group Report for EPCTC

	English Language Arts		Mathematics		English Learner Progress (percentage)		Graduation Rate (percentage)		College and Career (percentage)		Suspension Rate (percentage)	
	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025
All	NPC	NPC	NPC	NPC	Red 12%	Red 7.8%	Red 3.3%	Red 2.2%	Red 0.4%	Red 0.8%	Blue 0%	Blue 0%
EL	NPC	NPC	NPC	NPC	Red 12%	Red 7.8%	Red 18.6%	Red 3.8%	Red 0%	Red 0.6%	Blue 0%	Blue 0%
SED	NPC	NPC	NPC	NPC			Red 4%	Red 2.4%	Red 0.5%	Red 1.0%	Blue 0%	Blue 0%
Homeless	NPC	NPC	NPC	NPC			Red 15.6%	Red 3.4%	Red 0%	Red 1.0%	Blue 0%	Blue 0%
Hispanic	NPC	NPC	NPC	NPC			Red 3.4%	Red 2.2%	Red 0.4%	Red 0.8%	Blue 0%	Blue 0%

*No performance color (NPC) given for groups of less than 30 students. Status rates are not given for groups of less than 11 students.
Data retrieved from: <https://caschooldashboard.org>

Many areas of the EPCTC Dashboard have no performance color (“NPC”) due to the small size of the student group. Object 3 above shows EPCTC’s status for both the 2024 and 2025 Dashboard indicators for all students and all numerically significant student groups. Notably no scores for ELA or Math are available due to the small number of students who participated in State testing at 11th grade, although enrollment at EPCTC was 420 for the 2025 Dashboard and 658 for the 2024 Dashboard. The available data indicate that only five students were enrolled in 11th grade in 2024-25 and 13 students in 2023-24. The renewal Appeal Petition does not explain this variance. Object 4 below shows the Status and Change information from the 2024 and 2025 Dashboard indicators. For most of the Dashboard measures, the desired outcome is a high number or percent in the current year as well as an increase from the prior year. A distinguishing feature of the suspension measure is the desired outcome for low suspension rates, which means a low percent in the current year and a decline from the prior year rate. At EPCTC, suspension rates maintained at 0% for all students and all numerically significant student groups, earning a Blue indicator.

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Object 4: 2024 and 2025 California School Dashboard Student Status and Change Report for EPCTC

	English Language Arts		Math		English Learner Progress (percentage)		Graduation Rate (percentage)		College and Career (percentage)		Suspension Rate (percentage)	
	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025
All	NPC	NPC	NPC	NPC	Declined 10.9%	Declined 4.2%	Increased 1.8%	Declined 1.2%	Maintained 0.4%	Maintained 0.8%	Maintained 0%	Maintained 0%
EL	NPC	NPC	NPC	NPC	Declined 10.9%	Declined 4.2%	Increased 17%	Declined 14.7%	Maintained 0%	Maintained 0.6%	Maintained 0%	Maintained 0%
SED	NPC	NPC	NPC	NPC			Increased 2%	Declined 1.6%	Maintained 0.5%	Maintained 0.5%	Maintained 0%	Maintained 0%
Homeless	NPC	NPC	NPC	NPC			Increased 10.7%	Declined 12.2%	Maintained 0%	Maintained 1%	Maintained 0%	Maintained 0%
Hispanic	NPC	NPC	NPC	NPC			Increased 1.8%	Declined 1.2%	Maintained 0.4%	Maintained 0.4%	Maintained 0%	Maintained 0%

*No performance color (NPC) given for groups of less than 30 students. Status rates are not given for groups of less than 11 students. Data from Dashboard (<https://www.caschooldashboard.org/>)

Objects 5 and 6, below, show the graduation rates for EPCTC across the charter term on the California School Dashboard for all students and numerically significant student groups. Per the Dashboard, the one-year DASS graduation rate is shown for informational purposes only.

Object 5: 4-Year Graduation Rate Indicator from the California Dashboard for EPCTC

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
All Students	84.7%	N/A	N/A	2.1%	1.6%	3.3%	2.2%
English Learners	86.0%	N/A	N/A	2.2%	1.6%	18.6%	3.8%
SED	85.7%	N/A	N/A	2.2%	2.1%	4.0%	2.4%
Homeless	N/A	N/A	N/A	1.3%	4.8%	15.6%	2.9%
Hispanic	84.7%	N/A	N/A	2.2%	1.6%	3.4%	2.2%

Data from Dashboard (<https://www.caschooldashboard.org/>) N/A = Data not available

Object 6: 1-Year DASS Graduation Rate Indicator from the California Dashboard for EPCTC

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
All Students	N/A	68.6%	N/A	51.2%	59.5%	74.3%	89.5%
English Learners	N/A	67.6%	N/A	N/A	N/A	N/A	N/A
SED	N/A	73.3%	N/A	51.3%	61.1%	74.2%	91.4%
Homeless	N/A	N/A	N/A	N/A	N/A	N/A	90.9%
Hispanic	N/A	68.6%	N/A	51.2%	59.5%	74.3%	89.5%

Data from Dashboard (<https://www.caschooldashboard.org/>) N/A = Data not available

Objects 7 and 8, below, show the graduation rates for EPCTC and the comparison DASS schools (Apollo High, Broadway High, Opportunity Youth Academy (OYA), San Jose Conservation Corp (SJCCC). ESUHSD’s graduation rate is also provided as it is EPCTC’s authorizer. When reviewing the November 2025 EP Certificate for Annual Filing regarding the Bond documentation, EP included a list of comparable schools for “Family Learning Center”.

On this list were several high schools: Foothill High, James Lick High, Latino College Preparatory Academy (LCPA), and EPAFLC. These schools are also included for comparison.

Object 7: 4-Year Graduation Rate Indicator from the California Dashboard for EPCTC and Comparison Schools

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
EPCTC	1.7%	N/A	N/A	2.1%	1.6%	3.3%	2.2%
ESUHSD	87.8%	N/A	N/A	89.7%	86.9%	87.6%	89.1%
Apollo	95.2%	N/A	N/A	97.0%	92.0%	97.2%	97.6%
Broadway	59.0%	N/A	N/A	73.6%	71.3%	84.3%	78.8%
OYA	33.8%	N/A	N/A	22.6%	33.6%	31.1%	46.1%
SJCCC	46.4%	N/A	N/A	44.9%	47.3%	64.7%	52.5%
EPAFLC	7.1%	N/A	N/A	4.3%	3.3%	26.7%	14.9%
Foothill	25.9%	N/A	N/A	53.7%	33.7%	54.3%	59.9%
James Lick	84.1%	N/A	N/A	90.7%	74.7%	77.3%	81.0%
LPCA	86%	N/A	N/A	98.2%	96.6%	99.0%	99.1%

Data from Dashboard (<https://www.caschooldashboard.org/>) N/A = Data not available

Object 8: 1-Year DASS Graduation Rate Indicator from the California Dashboard for EPCTC and Comparison Schools

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
EPCTC	84.7%	68.6%	N/A	51.2%	59.5%	74.3%	89.5%
ESUHSD	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Apollo	N/A	N/A	N/A	91.4%	93.2%	97.2%	98.8%
Broadway	N/A	N/A	N/A	66.4%	66.4%	78.8%	76.3%
OYA	N/A	N/A	N/A	65.6%	66.5%	48.5%	65.8%
SJCCC	N/A	N/A	N/A	52.6%	52.5%	58.5%	51.0%
EPAFLC	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Foothill	N/A	N/A	N/A	46.4%	34.2%	52.3%	50.3%
James Lick	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LPCA	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Data from Dashboard (<https://www.caschooldashboard.org/>) N/A = Data not available or applicable

Local Indicators

School districts and charter schools are required to post Local Indicator data on the Dashboard each year in five areas. This data is self-reported. If data for local indicators are posted on time to the Dashboard, the reporting district or charter school earns a “Met” status for each area. EPCTC earned a status of “Met” for each local indicator on the 2024 and 2025 Dashboards.

Object 9: Local Indicators from the California Dashboard for EPCTC for 2024 and 2025

Indicator	2024 Status	2025 Status
Implementation of Academic Standards	Met	Met
Access to a Broad Course of Study	Met	Met
Basics: Teacher Credentials, Instructional Materials, Facilities	Met	Met
Parent and Family Engagement	Met	Met
Local Climate Survey	Met	Met

Data from Dashboard (<https://www.caschooldashboard.org/>)

Under the Local Indicator data for priority area 1, Basics: Teacher Credentials, Instructional Materials, Facilities, the Dashboard provides a report on the status of teacher credentials at a school with a comparison to the State Average. The 2024 Dashboard displays data from 2023 and the 2025 Dashboard shows 2024. In both years, EPCTC was below the State average for teacher credentialing.

Object 10: Local Indicator: Teacher Credentialing from the California Dashboard for EPCTC for 2024 and 2025 which shows Data for the Previous Year

Dashboard Year	FTE	% of Teaching FTE in the Clear Credential Category	Out-of-Field	Ineffective	Incomplete	Comparison to Statewide Average
2024	22	22.7%	3.0%	70.8%	3.5%	Below
2023	15.8	37.5%	4.0%	58.5%	0%	Below

Data from Dashboard (<https://www.caschooldashboard.org/>)

CAASPP Data

The tables below reflect the CAASPP data (<https://caaspp-elpac.cde.ca.gov/>) verified by SCCOE Staff while determining EPCTC’s schoolwide student performance. The tables below constitute the most recent academic data available for review. Statewide summative testing does not begin until third grade and is only given at eleventh grade in high school; therefore, the charts contain data for only the one grade level tested at EPCTC. No comparison data is provided for the districts to which EPCTC students otherwise would have attended, as EPCTC is a DASS school that serves a unique and specific population. A comparison of EPCTC to local districts or the State is not appropriate because the student populations are not comparable. However, four local alternative schools, Apollo High School in ESUHSD, Broadway High School in San Jose Unified School District (SJUSD), Opportunity Youth Academy (OYA) Charter School and San Jose Conservation Corps Charter (SJCCC) have somewhat similar populations to EPCTC, and their academic data has been provided as a comparison. Metropolitan Education (Metro Ed) District is also a possible comparison, however, as it is not specifically a grade 9-12 school but an education career/technical center that also provides adult education to finish high school, no mandated State CAASPP testing occurs and there is no data available on the California Schools Dashboard or through DataQuest for Metro Ed.

When reviewing the November 2025 EP Certificate for Annual Filing regarding the Bond documentation, EP included a list of comparable schools for “Family Learning Center”. On this list were several high schools: Foothill High, James Lick High, Latino College Preparatory Academy (LCPA), and EPAFLC.

Object 11: Percentage of Grade 11 EPCTC Students Scoring At or Above Standard on CAASPP in for 2024-25 in ELA and Math including Comparable DASS Schools

ELA					
Grade	EPCTC	Apollo	Broadway	OYA	SJCCC
11	*	27.70	3.57	14.71	No Data
All	*	27.70	3.57	14.71	No Data

Math					
Grade	EPCTC	Apollo	Broadway	OYA	SJCCC
11	*	1.54	0.00	5.00	No Data
All	*	1.54	0.00	5.00	No Data

Data retrieved from: <https://caaspp-elpac.ets.org/caaspp/Default>

Object 11 above, reflects the 2024-25 CAASPP results in English Language Arts (ELA) and Math for EPCTC, OYA, SJCCC, Apollo High in ESUHSD and Broadway High in SJUSD. EPCTC’s overall performance is not available to protect student privacy. Data is suppressed because fewer than 11 students were tested. Each of the four comparison schools serves high risk, alternative populations. SJCCC’s data is not available as CAASPP testing was not conducted since 2019.

Object 12: Percentage of Grade 11 EPCTC Students Scoring At or Above Standard on CAASPP in for 2024-25 in ELA and Math including Comparable Schools Listed in November 2025 Certificate for Annual Filing

ELA					
Grade	EPCTC	EPAFLC	Foothill	James Lick	LCPA
11	*	*	4.35	38.54	40.82
All	*	10.58	4.35	38.54	40.82

Math					
Grade	EPCTC	EPAFLC	Foothill	James Lick	LCPA
11	*	*	0.00	7.85	11.22
All	*	9.36	0.00	7.85	11.22

Data retrieved from: <https://caaspp-elpac.ets.org/caaspp/Default>

Object 12, above, shows comparison school CAASPP data based on the schools listed in the November 2025 Certificate for Annual Filing. EPCTC does not have any data as there were too few students in 11th grade. EPAFLC also did not have enough students in 11th grade but did have scores for grades 3-8.

Object 13: Charter Term Trend of Grade 11 EPCTC Students Scoring At or Above Standard on CAASPP

ELA							
	18-19	19-20	20-21	21-22	22-23	23-24	24-25
EPCTC	11.11	COVID	*	36.84	*	23.08	*
ESUHSD	62.25	COVID	70.24	63.06	61.84	60.27	59.93
Apollo	*	COVID	35.09	31.08	36.67	27.87	27.70
Broadway	2.35	COVID	2.44	5.48	9.80	10.17	3.57
OYA	13.21	COVID	23.53	26.67	10.12	14.71	14.71
SJCCC	*	COVID	No Data	No Data	No Data	No Data	No Data
EPAFLC	12.81	COVID	No Data	13.19	20.00	8.90	10.58
Foothill	7.14	COVID	0.00	4.92	10.39	12.24	4.35
James Lick	49.59	COVID	54.67	38.82	28.94	45.51	38.54
LCPA	38.24	COVID	No Data	33.33	32.04	42.42	40.82

Continued below

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Math							
	18-19	19-20	20-21	21-22	22-23	23-24	24-25
EPCTC	0.00	COVID	*	0.00	*	7.69	*
ESUHSD	41.75	COVID	53.07	38.08	34.62	36.05	35.69
Apollo	*	COVID	5.45	0.00	5.08	1.64	1.54
Broadway	1.19	COVID	2.70	0.00	0.00	0.00	0.00
OYA	0.00	COVID	6.25	3.39	1.35	1.03	5.00
SJCCC	*	COVID	No Data	No Data	No Data	No Data	No Data
EPAFLC	4.12	COVID	No Data	6.90	10.80	7.37	9.36
Foothill	1.03	COVID	0.00	0.00	0.00	0.00	0.00
James Lick	23.07	COVID	25.32	17.24	13.30	19.66	7.85
LPCA	22.00	COVID	No Data	5.15	1.94	10.10	11.22

Data retrieved from: <https://caaspp-elpac.ets.org/caaspp/Default>

Object 13, above, reflects schoolwide student achievement in ELA and Math across the last seven years of CAASPP for EPCTC, OYA, Apollo, Broadway, SJCCC, EPAFLC, Foothill, James Lick, and LPCA. The results reflect the rate of progress for EPCTC students comparable to the rate of progress for their peers at OYA, Apollo, Broadway, SJCCC, EPAFLC, Foothill, James Lick, and LPCA. SJCCC's data is not available as CAASPP testing was not conducted since 2019 and there were fewer than five students tested in 2018-19. No Data was available for 2020-21 for EPAFLC and LPCA as charter schools could elect to not test in those years due to COVID.

Object 14: Charter Term Trend of Numerically Significant Student Groups at EPCTC Grade 11 Scoring At or Above Standard on CAASPP

ELA							
	18-19	19-20	20-21	21-22	22-23	23-24	24-25
# Students Enrolled	21	COVID	No Data	32	11	13	5
# Students Tested	18	COVID	No Data	19	8	13	5
ALL	11.11	COVID	No Data	36.84	*	23.08	*
Hispanic	11.76	COVID	No Data	36.84	*	23.08	*
SED	11.11	COVID	No Data	35.29	*	25.00	*
EL	11.11	COVID	No Data	*	*	*	*

Math							
	18-19	19-20	20-21	21-22	22-23	23-24	24-25
ALL	0.00	COVID	No Data	0.00	*	7.69	*
Hispanic	0.00	COVID	No Data	0.00	*	7.69	*
SED	0.00	COVID	No Data	0.00	*	8.33	*
EL	0.00	COVID	No Data	*	*	*	*

*Data is suppressed due to fewer than 11 students tested. Data retrieved from: <https://caaspp-elpac.ets.org/caaspp/Default>

Object 14, above, reflects the numerically significant student group data across the term of the Charter. This data also reflects the data for 11th grade students who were tested each year as well as the number of 11th grade students enrolled in each year. This data does not show growth as it is not testing the same students each year, it shows achievement data.

**Object 15: Comparison of Percentage of Grade 11 Students Scoring
At or Above Standard on 2024-25 CAASPP across Numerically Significant Student Groups**

Group (ELA)	EPCTC	ESUHSD	Apollo	Broadway	OYA	SJCCC
Total Enrollment	658	22,560	141	176	283	158
Enrollment 11th	5	5,275	56	50	62	No Data
ALL	*	59.93	27.70	3.57	14.71	No Data
SED	*	51.01	28.00	4.88	13.75	No Data
Hispanic	*	37.50	25.46	4.08	16.09	No Data
EL	*	10.90	4.35	0.00	6.90	No Data
SWD	*	14.00	*	*	4.76	No Data

Group (Math)	EPCTC	ESUHSD	Apollo	Broadway	OYA	SJCCC
ALL	*	35.69	1.54	0.00	5.00	No Data
SED	*	24.79	2.00	0.00	5.13	No Data
Hispanic	*	10.22	1.82	0.00	5.89	No Data
EL	*	4.77	4.35	0.00	10.35	No Data
SWD	*	5.00	*	*	15.79	No Data

*Data is suppressed due to fewer than 11 students tested. Data retrieved from: <https://caaspp-elpac.ets.org/caaspp/Default>

Object 15, above, and Object 16, below, reflect the comparison of 2024-25 CAASPP ELA and Math data for all students and numerically significant student groups at EPCTC, OYA, Apollo, Broadway, SJCCC, EPAFLC, Foothill, James Lick, and LCPA. In ELA and Math, EPCTC’s performance cannot be compared since fewer than 11 students were tested and no scores are provided. SJCCC does not have any data. Per the CAASPP website, only 5 EPCTC students were enrolled at grade 11 and all five students were tested. The total enrollment for each school, as well as the 11th grade enrollment, is also provided.

**Object 16: Comparison of Percentage of Grade 11 Students Scoring
At or Above Standard on 2024-25 CAASPP across Numerically Significant Student Groups**

Group (ELA)	EPCTC	EPAFLC	Foothill	James Lick	LCPA
Total Enrollment	658	396	268	862	421
Enrollment 11th	5	5	52	237	100
ALL	*	10.58	4.35	38.54	40.82
SED	*	11.18	3.85	38.00	39.29
Hispanic	*	10.81	3.03	37.27	40.82
EL	*	2.31	0.00	4.23	7.89
SWD	*	8.70	*	0.00	*

Continued below

Group (Math)	EPCTC	EPAFLC	Foothill	James Lick	LCPA
ALL	*	9.36	0.00	7.85	11.22
SED	*	9.34	0.00	6.67	10.71
Hispanic	*	9.60	0.00	6.88	11.22
EL	*	7.63	0.00	4.17	2.63
SWD	*	21.74	*	0.00	*

*Data is suppressed due to fewer than 11 students tested. Data retrieved from: <https://caaspp-elpac.ets.org/caaspp/Default>

ELPI/ELPAC Data

Objects 17 and 18, below (from <https://caaspp-elpac.cde.ca.gov/>), reflect the 2024-25 English Learner Proficiency Indicator (ELPI) data as evidenced on English Language Proficiency Assessment of California (ELPAC) data. The ELPAC is given to all EL students K-12 to determine English Language Proficiency. This chart shows a comparison of EPCTC, the State, ESUHSD, and the comparable DASS High Schools: OYA, Apollo, Broadway, and SJCCC and the comparable schools chosen by EPCTC in its 2025 November Certificate of Annual Filing: EPAFLC, Foothill, James Lick, and LCPA. ESUHSD and the State scores are provided for general context. On comparison, EPCTC’s results are lower than those of comparison schools, ESUHSD, and the State in every category.

Object 17: 2025 Comparison of EL Progress Measured by ELPAC/ELPI

	EPCTC	ESUHSD*	Apollo	Broadway	OYA	SJCCC	State
Increased one or more ELPI levels	10.5%	32.4%	30.8%	34.5%	57.5%	41.9%	45.2%
Maintained level 4	0.00%	2.00%	2.6%	0.00%	2.5%	2.3%	1.3%
Total % making progress	7.8%	32.6%	33.3%	27.8%	39.3%	32.8%	46.4%
Performance Level	Red	Orange	Yellow	Yellow	Yellow	Red	Yellow
Number of EL Students	77	3,134	39	72	61	58	777,537
Total Enrollment	658	20,001	141	176	283	158	5,806,221

Data retrieved from: <https://caaspp-elpac.ets.org/caaspp/Default> *ESUHSD is included as it is the district in which EPCTC is located as well as its current authorizer.

Object 18: 2025 Comparison of EL Progress Measured by ELPAC/ELPI continued

	EPCTC	EPAFLC	Foothill	James Lick	LCPA
Increased one or more ELPI levels	10.5%	27%	35.4%	34.4%	39.5%
Maintained level 4	0.00%	0.4%	2.1	2.2%	0.00%
Total % making progress	7.8%	27.5%	34.6%	33.2%	39.5%
Performance Level	Red	Red	Orange	Yellow	Orange
Number of EL Students	77	244	52	214	129
Total Enrollment	658	396	268	862	421

Data retrieved from: <https://caaspp-elpac.ets.org/caaspp/Default>

Internal Academic Assessment Data

EPCTC provided internal assessment data from the Northwest Evaluation Association (NWEA) Measures of Academic Performance (MAP). This internal data, provided by EPCTC, shows percentage of students, including all numerically significant student groups, who met their Fall to Spring growth targets in Reading and Math. The

data does not show achievement data nor where the student started or ended, merely whether the student “met” growth targets yet no indication of what that growth target was. Further, this data is self-reported and unverifiable by SCCOE. On p. 27 of the EPCTC Renewal Appeal Petition, EPCTC states that this data shows academic performance for “students meeting grade level standards” however growth data and achievement data are separate data and are not interchangeable.

Object 19: NWEA MAP Reading: Percentage of EPCTC Students Who Met Fall to Spring Growth Targets for All Students and Numerically Significant Student Groups

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
All Students	37%	COVID	37%	44%	43%	51%	58%
SED	37%	COVID	36%	43%	43%	51%	58%
EL and ADEL (Adult EL)	36%	COVID	37%	43%	43%	50%	57%
Homeless	36%	COVID	27%	50%	49%	51%	58%
Hispanic	37%	COVID	37%	44%	43%	51%	58%

Data provided by EPCTC.

Object 20: NWEA MAP Math: Percentage of EPCTC Students Who Met Fall to Spring Growth Targets for All Students and Numerically Significant Student Groups

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
All Students	37%	COVID	40%	41%	38%	30%	43%
SED	37%	COVID	41%	39%	39%	29%	45%
EL and ADEL	36%	COVID	38%	41%	38%	30%	43%
Homeless	36%	COVID	50%	38%	56%	21%	45%
Hispanic	37%	COVID	40%	41%	38%	30%	43%

Data provided by EPCTC.

Graduation Preparation Data

EPCTC provided graduation preparation data through sharing the percentages of credits attempted and credits completed by EPCTC students over the charter term. However, no indication of what type of course credits attempted were included, nor was any additional documentation provided to verify EPCTC’s assertions. Further, most of EPCTC classes are English Language Development (ELD) classes, therefore, it is more likely than not that the credits attempted would be ELD classes which are not credits counted toward graduation except as electives. Therefore, credit completion for electives is not the same as credit completion for core content classes.

Object 21: EPCTC Course Credits Earned Rate Across Charter Term: Credits earned to Attempted Rate

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Rate	78.84%	71.46%	77.30%	83.15%	83.18%	80.07%	76.23%

Data provided by EPCTC.

Continuous Enrollment/Long Term Students Enrollment

One of the alternative metrics established between ESUHSD and EPCTC was regarding the number of students who remain continuously enrolled or identified as long-term students. Object 22, below, shows the numbers of students continuously enrolled during the charter term as provided by EPCTC. However, here again, the data is self-reported, nor was any additional documentation provided to verify EPCTC’s assertions, see further analysis below.

Object 22: EPCTC Continuous Enrollment/Long-Term Students Enrollment Rate for Charter Term

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Rate	19%	N/A	23%	34.1%	45.6%	38.47%	36.22%

Data provided by EPCTC.

SCCOE CSD Staff reviewed the November 2025 Certification for Annual Filing regarding the bond documentation submitted to the bond holders. The student retention rates are included from that documentation is included below in Object 23. Note that the continuous enrollment numbers from Object 22 do not match Object 23.

Object 23: EP Student Retention Rates from 2011-12 to 2024-25 for EPAFLC and EPCTC

STUDENT RETENTION RATES 2011-12 through 2024-25														
School Name	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Family Learning Center	55.6%	61.4%	64.3%	67.6%	71.5%	65.4%	69.1%	70.9%	64.7%	70.9%	66.7%	69.4%	64.6%	65.8%
EP Center for Training and Careers	42.2%	35.3%	38.2%	40.9%	38.4%	42.9%	39.8%	40.9%	38.0%	35.7%	35.3%	35.1%	34.7%	43.4%

Data provided by EPCTC November 2025 Certification for Annual Filing – Bond Documents

Object 24: EP Enrollment by School from 2002-03 to 2024-25 for EPAFLC and EPCTC

Total Enrollment By School			
	AFL	CTC	Total
2002-2003	577		577
2003-2004	766		766
2004-2005	169	899	1068
2005-2006	240	556	796
2006-2007	278	713	991
2007-2008	281	733	1014
2008-2009	311	699	1010
2009-2010	316	793	1109
2010-2011	363	740	1103
2011-2012	331	864	1195
2012-2013	317	907	1224
2013-2014	330	976	1306
2014-2015	380	890	1270
2015-2016	393	812	1205
2016-2017	359	714	1073
2017-2018	350	697	1047
2018-2019	369	643	1012
2019-2020	404	590	994
2020-2021	349	414	763
2021-2022	361	415	776
2022-2023	391	528	919
2023-2024	396	515	911
2024-2025	396	658	1054

Data provided by EPCTC November 2025 Certification for Annual Filing – Bond Documents

Object 25: EP Student Re-Enrollment Rates from 2011-12 to 2024-25 for EPCTC

STUDENT RE-ENROLLMENT RATES	
2011-12 through 2024-25	
School Year	Number of Re-enrollments
2011-12	188
2012-13	256
2013-14	219
2014-15	255
2015-16	253
2016-17	179
2017-18	187
2018-19	183
2019-20	170
2020-21	200
2021-22	131
2022-23	136
2023-24	183
2024-25	162

Data provided by EPCTC November 2025 Certification for Annual Filing – Bond Documents

Object 26, below, shows the SCCOE calculations regarding continuous enrollment at EPCTC compared with the data reported in the November 2025 Certification for Annual filing. Although SCCOE’s calculations are based on enrollment data provided by EPCTC, Staff were unable to independently verify or reconcile the reported continuous enrollment figures with supporting documentation or other enrollment reports. As a result, SCCOE Staff have continuing concerns regarding the reliability of the reported continuous enrollment data and the methodology used to calculate these figures.

Object 26: SCCOE Calculations Regarding Continuous Enrollment for EPCTC across Charter Term

	(A)	(B)	(C)	(D)	(E)
Year	Enrollment (Object 24)	Returning Students (Object 25)	SCCOE Percentage (B/A=C)	EPCTC Calculation (Object 22)	Variance (D-C=E)
2011-12	864	188	21.8%	42.2%	20.4%
2012-13	907	256	28.2%	35.3%	7.1%
2013-14	976	219	22.4%	38.2%	15.8%
2014-15	890	255	28.7%	40.9%	12.2%
2015-16	812	253	31.2%	38.4%	7.2%
2016-17	714	179	25.1%	42.9%	17.8%
2017-18	697	187	26.8%	39.8%	13.0%
2018-19	643	183	28.5%	40.9%	12.4%
2019-20	590	170	28.8%	38.0%	9.2%
2020-21	414	200	48.3%	35.7%	-12.6%
2021-22	415	131	31.6%	35.3%	3.7%
2022-23	528	136	25.8%	35.1%	9.3%
2023-24	515	183	35.5%	34.7%	-0.8%
2024-25	658	162	24.6%	43.4%	18.8%

Object 27, below, shows the number of students enrolled at EPCTC across the charter term by grade level, indicating the number of students who progress by grade through the program. The number of students per grade level decreases through cohorts across the charter term. Cohorts of students should start in 9th grade and progress through the school to attain graduation. However, the data below shows that cohorts do not “move” through the grade levels. The number of students in 9th grade is relatively stable and few students transition to the other grade levels. It is also worth noting the number of students in 11th grade each year, as 11th grade is the only grade that participates in State testing annually.

Object 27: EPCTC Historical Enrollment by Grade Level and Color Coded by Cohort Groups

Academic Year	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
Grade 9	512	492	292	337	458	447	589	304
Grade 10	57	51	45	38	24	33	35	55
Grade 11	11	10	24	14	19	2	5	34
Grade 12	63	37	53	26	27	33	29	27
Total Enrollment	643	590	414	415	528	515	658	420

Data retrieved from: <https://dq.cde.ca.gov/dataquest/>

Object 28, below, shows the projected enrollment through the new requested charter term. The projections mirror the same process which has been utilized throughout the current charter term with most students remaining in 9th grade instead of moving through the various grade levels and again avoiding annual State testing in 11th grade. Further, the information for 2025-26 in the projected EPCTC enrollment, does not match the actual 2025-26 enrollment data.

Object 28: EPCTC Projected Enrollment for the New Charter Term by Grade Level and Color Coded by Cohort Groups

Academic Year	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
Grade 9	464	464	464	489	489	489
Grade 10	31	31	31	31	31	31
Grade 11	4	4	4	4	4	4
Grade 12	26	26	26	26	26	26
Total Enrollment	525	525	525	550	550	550

Data retrieved from: EPCTC proposed budget for 2025-26 to 2030-31

Post-Secondary Outcome Data

Post-secondary outcomes are determined by the number of graduates who enrolled, attended, and graduated from college. This information is collected by the National Student Clearinghouse (NSC) and the most recent available data on the CDE website (<https://dq.cde.ca.gov/dataquest/>) is from 2022-23 (see Table 29 below). This data does not include college persistence or completion for graduates, but does include comparisons to OYA, Apollo, Broadway, SJCCC, EPAFLC, Foothill, James Lick, and LCPA. EPAFLC did not have any data as data are suppressed (*) on the College-Going Rate (CGR) Reports if the cell size within a selected student population (high school completers) is ten (10) or less.

Object 29: EPCTC 2022-23 College-Going Rate for California High School Students

Name	High School Completers	High School Completers Enrolled in College	College-Going Rate	Enrolled in College (In-State)	Enrolled in College (Out-of-State)	No Record of College Enrollment
EPCTC	32	13	40.6%	40.6%	0.0%	59.4%
ESUHSD	4,742	3,751	79.1%	75.5%	3.6%	20.9%
OYA	132	28	21.2%	20.5%	0.8%	78.8%
Apollo	69	43	62.3%	60.9%	1.4%	37.7%
Broadway	106	23	21.7%	21.7%	0.0%	78.3%
SJCCC	160	36	22.5%	21.9%	0.6%	77.5%
EPAFLC	*	*	*	*	*	*
Foothill	63	23	36.5%	35.9%	1.6%	63.5%
James Lick	150	110	73.3%	71.3%	2.0%	26.7%
LCPA	86	67	77.9%	75.6%	2.3%	22.1%

Data retrieved from: <https://dq.cde.ca.gov/dataquest/>

Alternative Metrics Performance Summary

As a DASS school, alternative metrics were established EPCTC’s alternative metrics performance as part of its renewal review. Object 30, below, is EPCTC’s self-assessment of its performance on the alternative metrics. EPCTC claims that it has partially met or exceeded all its metrics and has made growth in all areas to warrant renewal.

Object 30: EPCTC’s Self-Assessment Summary of Alternative Metrics Performance

Outcomes	Targets	Self-Assessment and Evidence Provided
Attendance Rate	Meet or exceed an average of 75% yearly attendance	Exceeded – As shown in Table i.11, EPCTC exceeded its attendance goal with an average rate of over 82% across seven years, surpassing the 75% benchmark.
NWEA ELA growth target	40% of over 19 students meet ELD growth target	Exceeded - As demonstrated in Table i.9, EPCTC exceeded its ELA Growth Target, with 40% of students meeting their growth goals on the NWEA assessment. Students demonstrated consistent progress in reading proficiency, improving from 46% to 58% over the charter term.
NWEA Math growth target	55% of over 19 students meet Math growth target	Partially Met - Table i.10 shows that EPCTC partially met its Math Growth Target, with 55% of students achieving their growth goals. The data illustrates notable improvement since 2018, rising from 37% to 43% of students meeting grade-level standards.
Graduation Rate	80% of seniors will graduate within their senior year	Partially Met - As indicated in Table i.5, EPCTC made remarkable progress in increasing its one-year DASS graduation rate from 51.2% in 2022 to 74.3% in 2024, demonstrating a 23.1-point improvement.
Student Participation on TEN Feedback Loop	80% of student participation on the TEN feedback loop	Partially Met - As presented in Table i.12, EPCTC’s average student participation on the School Climate Survey was 63.6%, which, while below the 80% goal, represents meaningful engagement from students actively attending classes.
Credits Completion	Complete 70% of total credits attempted	Exceeded - According to Table i.13, EPCTC exceeded its goal for credits completion, achieving an average rate of 78% and reaching a high of 83.18% in 2022–2023, surpassing the 70% target.
Increase number of enrolled long term students	10% increase in number of continuously enrolled/ long-term students	Exceeded - Table i.14 shows that EPCTC exceeded its goal of increasing long-term student enrollment by 10%, achieving a rise from 19% in 2018–2019 to 36.22% in 2024–2025, with a peak of 45.6% in 2022–2023.

Data provided by EPCTC (Renewal Appeal Petition, p. 28-31)

Object 31, below, is ESHSUD’s summary of EPCTC’s performance on alternative metrics. Per ESUHSD, many of the alternative metric performance areas were unable to be substantiated due to lack of evidence being submitted by EPCTC.

Object 31: ESUHSD Summary of EPCTC Renewal Alternative Metrics Performance

Outcomes	Targets	Evidence Provided
Attendance Rate	Meet or exceed an average of 75% yearly attendance	Table showing attendance ranging from 81.99% to 81.72% (Provided)
NWEA ELA growth target	40% of over 19 students meet ELD growth target	Self-rating of “Exceeded”. (Unable to substantiate claim due to no data provided)
NWEA Math growth target	55% of over 19 students meet Math growth target	Self-rating of “Partially Met”. (Unable to substantiate claim due to no data provided)
Graduation Rate	80% of seniors will graduate within their senior year	Self-rating of “Exceeded”. (District Staff has concerns about the process in which EPCTC uses to promote students annually and is uncertain if the graduation rate is a true reflection of all potential seniors. Data does not support rating on the one-year graduation rate on DataQuest.)
Student Participation on TEN Feedback Loop	80% of student participation on the TEN feedback loop	Page 26, states: “EPCTC maintained an average of 63.6% of students participating in the annual school climate survey.”
Credits Completion	Complete 70% of total credits attempted	Page 27 states: “EPCTC maintained an average of 78% of students earning and completing courses for credits that they attempted.” (Unable to substantiate this claim due to no data provided)
Increase number of enrolled long term students	10% increase in number of continuously enrolled/long-term students	Page 27 states: “EPCTC maintained an average of 32% of students remaining continuously enrolled long-term.”

Data provided by ESUHSD

SCCOE also reviewed the data which EPCTC submitted regarding each of the metrics. The purpose of alternative metrics is for DASS schools to meet specific targets across the charter term, not just a one moment in time meeting of the target. Therefore, the metrics should be met in each year of the term. SCCOE reviewed the data provided by EPCTC to determine if each metric could be substantiated and supported. Object 32, below, provides a synopsis of the SCCOE’s findings on the alternative metrics.

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Object 32: SCCOE Summary of EPCTC Renewal Alternative Metrics Performance

Outcomes	Targets	Evidence Provided							Determination
		18-19	19-20	20-21	21-22	22-23	23-24	24-25	Met/Not Met
Attendance Rate	Meet or exceed an average of 75% yearly attendance	81.99%	81.65%	83.67%	81.79%	82.54%	81.91%	81.72%	Met
NWEA ELA growth target	40% of over 19 students meet ELD growth target	46%	N/A	37%	44%	43%	51%	58%	Partially Met
NWEA Math growth target	55% of over 19 students meet Math growth target	37%	N/A	40%	41%	38%	30%	43%	Not Met
Graduation Rate	80% of seniors will graduate within their senior year	84.7%	68.6%	N/A	51.2%	59.5%	74.3%	89.5%	Partially Met
Student Participation on TEN Feedback Loop	80% of student participation on the TEN feedback loop	8.5 TEN Survey	COVID	68%	70%	64%	56%	60%	Not Met
Credits Completion	Complete 70% of total credits attempted	83.67%	71.46%	77.30%	83.15%	83.18%	80.07%	76.23%	Met*
Increase number of enrolled long term students	10% increase in number of continuously enrolled/long-term students	19% Baseline	N/A	23% Yearly 4%	34.1% Yearly 12.1%	45.6% Yearly 11.5%	38.47% Yearly -7.13%	36.22% Yearly -2.25% Total 17.22%	Partially Met – total growth more than 10%

Data provided by EPCTC. *Cannot substantiate the data provided nor do the credits align with the grade levels the students are enrolled in (See Object 27).

School Academics Summary

EPCTC serves a student population that is highly transitory, significantly behind, and in need of intensive support. It serves a migrant population ages 18 and over, who are no longer able to attend its sister school, EPAFLC which serves students TK-12. As EPCTC is a DASS school, alternative metrics, established with ESUHSD, are utilized to determine whether renewal is warranted. While the academic data is lacking as there are few students enrolled in 11th grade where State testing occurs, EPCTC states they have met all the requirements for renewal.

Unfortunately, this is not the case as seen in ESUHSD's and SCCOE's analysis of the alternative metrics (see Objects 31 and 32). The internal assessment data is unsubstantiated and does not show achievement.

EPCTC's academic performance data and post-secondary outcomes reflect mixed results in achievement schoolwide and across significant student groups over the course of the entire charter term. EPCTC's reported outcomes are lower than those of the comparison schools OYA, SJCCC, Apollo and Broadway High Schools, four alternative schools serving DASS populations and outperformed by the comparison schools identified by EP in the 2025 Certificate of Annual Filing: EPAFLC, Foothill High, James Lick High, and Latino College Prep Academy. While the data for SJCCC is limited, it still outperforms EPCTC on the ELPI indicator. Education Code 47607(c)(7) requires the County Board of Education to consider EPCTC's Dashboard results and its performance on alternative metrics applicable to EPCTC based on the pupil population served. These data and metrics, including evidence of limited progress made by students and low graduation rates, indicate that while EPCTC may be providing a community benefit through access to community services to its students, its academic performance lacks support for renewal and that closure as a charter school is in the best interest of students.

Renewal Site Visit

On May 22, 2026, May 26, 2026, and May 27, 2026, CSD Staff conducted a Renewal Site Visit to the EPCTC campus. CSD Staff visited classrooms for both the AM and PM programs, met with site leadership, and conducted focus group interviews with educational partners, including current students/families, board members, and teachers. During the visit, CSD Staff observed instructional practices, reviewed documents, inspected the facilities, and determined whether the educational and operational practices were consistent with the "bilingual" instruction model outlined in the petition.

Finances

Object 33, below, provides an eight-year historical financial summary for EPCTC from Fiscal Year (FY) 2017-18 through FY 2024-25. The financial data is supported by audited financial reports. Overall, EPCTC has demonstrated a significant improvement in its financial condition during the review period, transitioning from operating deficits to sustained operating surpluses and substantial accumulation of reserves.

During FY 2017-18 and FY 2018-19, EPCTC experienced operating deficits of **\$(314,906)** and **\$(719,270)**, respectively, as expenditures exceeded revenues. These deficits reduced the school's net assets from approximately \$6.3 million in FY 2017-18 to \$5.4 million in FY 2018-19. Despite these losses, EPCTC maintained a strong reserve position, with ending net assets representing 81% and 69% of annual expenditures, respectively.

Beginning in FY 2019-20, EPCTC's financial performance improved significantly, generating a surplus of \$1.1 million. EPCTC continued to report positive operating results in each subsequent year, including \$4.2 million in FY 2024-25. The substantial increase in revenues beginning in FY 2022-23 reflects the impact of increased enrollment coupled with one-time state and federal funding available to charter schools during and after the COVID-19 pandemic.

Over the eight-year period, total revenues increased from \$7.4 million in FY 2017-18 to \$13.5 million in FY 2024-25, an increase of approximately 82%. During the same period, expenditures increased at a significantly slower rate, from \$7.8 million to \$9.3 million, an increase of approximately 20%. As a result, EPCTC consistently generated operating surpluses that strengthened its financial position and increased its accumulated net assets.

As of June 30, 2025, EPCTC reported total net assets of approximately \$16.5 million, representing 177% of annual expenditures. Based on the historical financial information reviewed, SCCOE Staff are not aware of any immediate concerns regarding the school’s fiscal solvency or ability to meet its financial obligations.

However, despite EPCTC’s strong financial position, CSD Staff identified several operational and financial reporting areas that warrant additional clarification. Specifically, the relationship and financial dependencies between EPCTC and EPAFLC remain unclear based on the financial and personnel documentation provided. The financial policies and procedures submitted by the school do not adequately describe the methodology used to allocate shared costs, personnel expenses, facilities expenses, administrative overhead, and other operational expenditures between two separate Local Educational Agencies (LEAs). Given that both programs operate on the same campus and under a common organizational structure, a clearly documented allocation methodology is necessary to ensure expenditures are appropriately assigned and that each LEA’s (EPCTC and EPAFLC) financial position is accurately represented and the financial sustainability of each school can be independently evaluated.

Additionally, CSD Staff continue to seek clarification regarding EPCTC’s enrollment and Average Daily Attendance (ADA) practices. Given the school’s unique educational model serving adult learners, a clear understanding of student enrollment tracking, attendance accounting practices, governance of shared operations, instructional delivery, and the relationship between enrollment, ADA generation, and funding is necessary to fully evaluate the long-term sustainability of school’s financial model. While EPCTC’s current financial position remains strong, unresolved questions regarding enrollment reporting, attendance practices, student persistence, and the allocation of shared resources limit SCCOE Staff’s ability to reasonably assess the ongoing effectiveness and sustainability of the school’s operational and financial structure.

Object 33: EPCTC Historical Financial Summary

		2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
[A]	Total Revenues	7,445,346	7,074,849	7,288,994	7,600,357	7,084,061	10,306,233	11,102,149	13,544,625
[B]	Total Expenses	7,760,252	7,794,119	6,173,310	6,879,032	7,008,920	8,015,596	8,430,771	9,306,880
[C] = [A - B]	Net Income (Loss)	(314,906)	(719,270)	1,115,684	721,325	75,141	2,290,637	2,671,378	4,237,745
[D]	Net Assets Released from Restriction	-	-	-	-	-	-	-	-
[E]	Beginning Fund Balance	6,602,892	6,287,986	5,406,525	6,520,227	7,241,552	7,316,693	9,607,330	12,278,708
[F]	Adjustment to Beg. Fund Balance	-	(162,191)	(1,982)	-	-	-	-	-
[G] = [(E+F)+(C+D)]	Total Net Assets, End of Year	\$ 6,287,986	\$ 5,406,525	\$ 6,520,227	\$ 7,241,552	\$ 7,316,693	\$ 9,607,330	\$ 12,278,708	\$ 16,516,453
[H] = [G/B]	Fund Balance %	81%	69%	106%	105%	104%	120%	146%	177%

1. Source of Data: Audited Financial Reports for FY 2017-18 through 2024-25.
Row[C] is a change in net assets without donor restrictions

Demographic Data

In accordance with Education Code Section 47607(d)(1)(B) and (C), SCCOE requested, but did not receive from CDE any aggregate data reflecting pupil enrollment patterns at EPCTC. As EPCTC is a DASS high school no data is available given that State testing only occurs in 11th grade. Therefore, SCCOE reviewed the publicly available sustainability data from CDE and noted that enrollment patterns mirror the transient nature of the student population served.

REVIEW OF THE CHARTER PETITION

SCCOE CSD Staff reviewed the Renewal Appeal Petition using the criteria established in California Education Code Sections 47605(c), 47607, and 47607.2, consistent with County Board Policy 0420.4 (c) and found the following:

1. Sound Education Program

According to the EPCTC Renewal Appeal Petition, “EPCTC typically serves 750 high school, 9-12th grade students, aged over 18:

- who are recent immigrants and for whom the U.S. school experience is new and intimidating. Students’ primary language is Spanish.
- Out-of-school students who have not been successful in large, comprehensive high schools. Most of these students are seeking a second chance at getting an education and improving their lives, as well as their children’s lives.
- Students who are working adults, holding one or more jobs to meet the Bay Area’s rising and living costs.
- Students who are parenting and/or head of households.
- Students who endure family separation.”

It asserts that its instructional program is built on a collection of best practices and experiences of the founding members, who have over 75 years of experience working with this target population. Key instructional strategies include following an accelerated and sequenced English Language Development (ELD) curriculum that prepares students for high school core classes aligned to Common Core State Standards (CCSS), Next Generation Science Standards (NGSS), History-Social Science Framework, remaining State Content Standards and ELD Standards. The curriculum focuses on language acquisition, critical thinking, writing, speaking, collaboration, and technology skills to provide a rigorous high school education. As many of EPCTC’s students are native Spanish speakers with need for intensive ELD, EPCTC utilizes pre-literacy intensive English instruction where students are routinely assessed on their ELD and grouped based on their language proficiency. Then as language develops, other content areas such as Social Studies and Science are introduced with primary language support.

CSD Staff reviewed the curriculum included in the Renewal Appeal Petition and noted that much of the curriculum listed was copyrighted between 2001 and 2019. Only the Visual and Performing Arts curriculum utilized the CA Arts Framework from 2020 and the Health Education Framework for CA Public Schools in 2021, is most current curriculum.

During the site visit, CSD Staff visited EPCTC classrooms and saw little direct instruction or grade level rigor in any of the classes. All the classrooms visited during the morning program had few students (4 – 20) and the classes were shared between EPCTC and EPAFLC students. In the evening program, again, there were few students in each class (4-18). During both programs, learning/lesson objectives were more task-based than skill-based, i.e., “students will complete a poem and share it”, rather than “students will be able to create and analyze a poem utilizing a variety of poetic styles”. When reviewing the standards utilized in each of the classes, the classes lacked the rigor for the grade levels the classes were purported to serve. Most of the classes were ELD classes and focused on English grammar, these classes have the most students, whereas the core high school content classes had limited numbers of students.

EPCTC states its current and projected enrollment for the coming charter term is between 525 and 550:

Object 34: EPCTC Projected Charter Term Enrollment as Presented in Renewal Appeal Petition

Table A.1: Enrollment Projections from 2026-31

Grade	Current Year	Year 1	Year 2	Year 3	Year 4	Year 5
	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
9-12 TOTAL	525	525	525	550	550	550

Data provided by EPCTC Renewal Appeal Petition page 36

However, EPCTC’s current enrollment for 2025-26 is 420 as of October and its enrollment in May is 400, therefore the current enrollment and future enrollment projections are incorrect, especially considering EPCTC’s opening statement that it serves 750 students. Furthermore, the enrollment data from the current charter term shows great fluctuations with a high of 658 in 2024-25 to a low of 414 in 2020-21, see Objects 27 and 28, therefore it is unclear as to how EPCTC is determining that enrollment for the projected charter term will be between 525 and 550, unless it utilizes an average of all the enrollments across the charter term.

Graduation Requirements:

EPCTC requires 190 credits to graduate: 30 credits for History/Social Science, 40 credits for English, 20 credits for Mathematics, 20 credits for Science, 10 credits for Foreign Language or Performing Arts, 10 credits for Physical Education, and 60 credits for Electives. EPCTC further states, according to its 2025-26 Student Handbook (p. 21-22), its program progression is:

Object 35: EPCTC Program Progression

Pre- Grade 9	Grade 9	Grade 10	Grade 11	Grade 12
0-36 Credits	37-72 Credits	73-116 Credits	117-160 Credits	161+ Credits
ELD 1A-3B classes Math Lab Integrated Math Physical Education Foreign Language Art or any other Elective	English 1 Math Lab Integrated Math Physical Education Foreign Language Art or any other Elective	English 2 Integrated Math World History Integrated Science I or Int. Science II Foreign Language Art or any other Elective	English 3 Integrated Math US History Integrated Science I or Int. Science II Foreign Language Art or any other Elective	English 4 Integrated Math Government Economics Foreign Language Art or any other Elective

“Notice: This program progression is an example and varies on the individual students, based on previous education, credits earned, initial placement, etc.” (per EPCTC p. 22)

Given the above information and EPCTC’s data which states that EPCTC students complete 78% of credits attempted (see Objects 21, 30, 31, 32, and p. 27 of the Renewal Appeal Petition) it is unclear how it is possible that more students are not moving through the various grade levels to graduate (see Objects 27 and 28). Further, during the site visit, EPCTC students and staff stated that many of the EPCTC students choose to attend EPCTC simply to learn English, **not** to complete their high school diploma. Students will attend the ELD classes and then when they transition into English 1 or other high school content classes, the students drop out of EPCTC to focus on work or career. It was suggested by staff that EPCTC create two enrollment tracks – one for diploma and one for ELD only. It was also suggested by EPCTC

students/families that EPCTC not mix adult and youth students in classes as adults and youth have different needs and experiences.

Students Performing Below Grade Level:

EPCTC states it allows all students who are struggling to receive immediate support from staff in remediating challenges and accelerating strengths through a multi-tiered system of support (MTSS). It further states that EPCTC's flexible learning environment and coursework is adapted to provide scaffolds and build basic skills before moving on to mastering the skills and standards of the high school core curriculum. Embedded within the "bilingual" program for instruction are strategies providing individual support within the instructional day to provide more focused instruction for struggling students.

However, based on SCCOE Staff's review of the Renewal Appeal Petition and supporting documentation, EPCTC does not appear to operate a bilingual instructional program as described in the petition. Rather, the bilingual instructional model is associated with EPAFLC's TK-8 educational program. As a result, the references to a "bilingual" program in the EPCTC Renewal Appeal Petition appear to be carried forward from prior petition language and were not updated to accurately reflect EPCTC's current instructional program.

As the Renewal Appeal Petition continues to describe EPCTC as operating a bilingual instructional program, the petition also represents that the instructional program would be staffed consistently with applicable credentialing requirements for bilingual instruction. However, SCCOE Staff's review of credential documentation found that the staffing described in the petition does not fully align with those representations.

Foster and Homeless Youth (HY):

EPCTC states that it follows the identification, enrollment, and continued support procedures as outlined by the McKinney-Vento Act and detailed in its Homeless and Foster Youth (FY) Policy. It states it has a Homeless Liaison who provides outreach to families and coordinates services between the family and other agencies, especially since EPCTC has approximately 20% of its population as HY per the California School Dashboard. However, per EPCTC documentation, 66% are homeless or housing challenged. To help HY, EPCTC provides access to health, dental, mental health, substance abuse services, housing services, and other appropriate services. Further, "[w]ith reservation funds for homeless education, EPCTC provides an individual device, internet access, transportation to and from school (bus passes or gas cards), clothing, shoes, laundry supplies, food, toiletries, school supplies, field trips, social emotional counseling, academic support, a mentor, tutoring, and a backpack with school supplies. EPCTC also provides a quiet space to work for HY. Specifically for high school activities, EPCTC covers fees for caps and gowns and ensures fee waivers to apply for college or university. To ensure that the students have access to the entire high school experience, EPCTC also covers the cost of admission to games, formal ball, and field trips." p 60 of the Renewal Appeal Petition.

SCCOE Staff is concerned with the high number of homeless "youth" identified at EPCTC since the age population addressed at EPCTC is currently ages 18 to at least 73. Additional monies and supports are provided for homeless "youth" which the legislature did not intend a 73-year old student to access.

Special Education:

As EPCTC serves students age 18 and older, EPCTC has only one of its students identified as eligible for special education services and that student has dropped out. Per the Renewal Appeal Petition, EPCTC states it supports all students with disabilities until their 22nd birthday. The students are offered a continuum of services in the least restrictive environment “based on that student’s progress toward meeting their Individual Education Plan (IEP) goals” (p. 67). EPCTC states that “services are provided by either an onsite staff member who holds the appropriate credential or by a qualified outsourced educational service provider” (p. 67). The Renewal Appeal Petition further states that special attention is given to transition plans and that EPCTC staff work directly with the student and their family as they transition to middle school, high school and college or career. This explanation regarding transition plan services is better explained with EPAFLC as EPCTC only serves adult students in grades 9-12, not students who transition from elementary to middle, then to high, and further on.

EPCTC is part of the El Dorado Charter Special Education Local Planning Area (SELPA) and special education staff are provided with professional development and support from the SELPA. The Renewal Appeal Petition states it will comply with all requirements of IDEA and 504. The Renewal Appeal Petition contains a letter of good standing from El Dorado SELPA.

During the site visit, CSD reviewed EPCTC and EPAFLC’s special education files. CSD Staff found anomalies including: lack of appropriate signatures on documents, outdated hearing and vision assessments, lack of updated present levels of performance, use of highlighting which interferes with parent choice on a Free and Appropriate Public Education (FAPE), and lack of communication logs.

Upon review of the EPCTC budget, EPCTC receives over \$500,000 for special education services for EPCTC students with disabilities, based on its average daily attendance (ADA) allocation and not on its number of students with disabilities. However, according to the EPCTC budget, ALL these funds are transferred to EPAFLC. There is no funding remaining for special education support at EPCTC and no indication that EPCTC required special education services are being provided by EPAFLC. This action is allowable by El Dorado SELPA if there is: (1) a Board Resolution outlining the transfer, (2) a Memorandum of Understanding between the two entities, and (3) the entities are within a common organization, like Escuela Popular del Pueblo. CSD Staff is concerned by transferring all special education funding to EPAFLC, EPCTC will not be able to fulfill its obligations for its students with disabilities, however, as there is only one student with disabilities at EPCTC, and that student has now dropped out, the issue is moot. CSD Staff contacted El Dorado Charter SELPA and learned that EPCTC and EPAFLC are currently in good standing, with EPCTC as Small LEA Monitoring, Universal Support entity and EPAFLC as Small LEA Monitoring, Cyclical Monitoring entity. This means that both EPCTC and EPAFLC have small numbers of students with disabilities. El Dorado Charter SELPA also shared that both LEAs have been timeline compliant for the last two years. The SELPA monthly review shows minimal timeline compliance issues for EPAFLC. In 2024-25, however, both LEAs passed only ONE of the four tests required for Maintenance of Effort (MOE) – the State/Local aggregate total, they had no exemptions, no revenue/reimbursement from any pools, and no local contribution. The current El Dorado Charter SELPA review found:

Object 36: 2025-26 El Dorado Charter SELPA Review Current Status

		9/12/25	10/31/25	12/15/25	1/14/26	1/15/26	3/31/26	4/15/26	4/30/26	7/30/26	Out of 9
EDCOE ID	LEA	YE MOE	Enrollment 1	PY Audits	Expd 1	Enrollment 2	MOE PreTest	Expd 2	Enrollment 3	Expd 3	SCORE
1617021	Escuela Popular Accelerated Family Learning	LATE	On Time	LATE	On Time	On Time	On Time	On Time	On Time		6
1617047	Escuela Popular/Center for Training and Careers, Family Learning	LATE	On Time	LATE	Never Submitted	On Time	On Time	Never Submitted	On Time		4

Data provided by El Dorado Charter SELPA

Object 37: 2025-26 Special Education Enrollment by Program Setting for EPCTC and Comparison Schools and District and State

	EPCTC	ESUHSD*	Apollo	Broadway	OYA	SJCCC	EPAFLC	Foothill	James Lick	LCPA	State
Special Education Enrollment	1	2,486	8	36	68	46	38	26	140	58	883,862
Regular Class 80% or More of the Day	100%	35.0%	75.0%	44.4%	92.6%	71.7%	97.4%	34.6%	24.3%	100%	60.9%
Regular Class 40-79% of the Day	0.0%	46.5%	25.0%	30.6%	4.4%	19.6%	2.6%	65.4%	50.0%	0.0%	14.0%
Regular Class 39% or Less of the Day	0.0%	13.5%	0.0%	25.0%	2.9%	8.7%	0.0%	0.0%	23.6%	0.0%	16.5%
Separate School & Other Settings	0.0%	5.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.1%	0.0%	2.5%
Preschool Setting	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.1%
Missing/Unknown	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Data gathered from Dataquest: <https://data1.cde.ca.gov> *ESUHSD is included as it is the current authorizer for EPCTC

English Learners (EL):

The Renewal Appeal Petition describes a process in structuring a “bilingual” program which integrates Specifically Designed Academic Instruction in English (SDAIE) strategies including “accessing prior knowledge, cooperative learning, hands-on instruction, student communication, explicit vocabulary instruction, multicultural education and checking for understanding” (p. 52). EPCTC believes that ELs can achieve the highest academic standards in a well-designed program where students learn English without having to sacrifice content or their native language. It states that students can continue their development of both languages through grade 12, equipping them with a high level of language proficiency in two or more languages using integrated English Language Development (ELD) and designated ELD. At EPCTC, 20.1% of the students have been identified as English Learners but, EPCTC also states that 99.2% are Adult English Learners (ADEL). While the California School Dashboard only indicates 20.1%, EPCTC stated that its EL rate was incorrect, as the Dashboard did not include any EL students over age 22. Further, while the Renewal Appeal Petition mentions that the program is a “bilingual” program in two places in the charter, the program for EPCTC is an ELD adult learning program which also allows adult students to complete their high school diploma. Although EP staff claim that failing to remove “bilingual program” was an oversight, it is part of the EPCTC charter. Most of the classes at EPCTC are ELD classes, not bilingual classes. If EPCTC was a “bilingual program”, all teachers would not only need English Learner Authorizations for their credentials but would also need the appropriate CTC bilingual authorizations to teach students in Spanish. Only a few (8 out of 27) EPCTC teachers have bilingual authorizations in violation of the language of the charter.

On the master schedule, EPCTC has a significant number of ELD classes available. As part of the grade level progression process, there is a “pre-9th” grade which ELD classes fall into. These ELD classes are not counted towards English A-G credit completion but are treated only electives. Most of the students at

EPCTC are identified as 9th graders. During the student/family interview panel, one student stated they had been at EPCTC for twelve (12) years and they are currently in 12th grade. EPCTC staff during the public hearing stated they “have students from ages 19 to 73 attending EPCTC.” While EPCTC may be providing a service to its community, that service should not be at the expense of taxpayers who expect that high school should be completed within 4-5 years. If EPCTC was an adult education program, there would be a different expectation regarding the process, but EPCTC is a charter high school.

Although 20% of students at EPCTC are EL, it has failed to establish an English Learner Advisory Committee (ELAC) to provide instructional support to parents regarding supporting their English Language Learner. EPAFLC however, does have an ELAC committee which meets in conjunction with its School Site Council (SSC), however while the ELAC/SSC agendas for January 22, 2026, February 19, 2026, March 12, 2026, and April 23, 2026, are present on the EP website, they are merely agenda templates and do not contain any topics of information which were to be discussed nor are any minutes of meetings provided. Therefore, EPCTC is out of compliance as it has not established an ELAC. During the EPCTC Family/Student interviews, EPCTC students further requested that an ELAC be established for them just like EPAFLC has.

SCCOE CSD Staff is concerned with the limited progress on the English Learner Proficiency Indicator (ELPI) – only 7% of English Learner students making progress, given the high number of students at EPCTC who are EL or ADEL. During the student interview panel, the student who had been at EPCTC for 12 years, was one of the students who requested translation services. EPCTC needs to focus on developing and implementing an improvement plan to monitor and track improvement in student academic achievement and performance.

Educational Leadership:

The Executive Director and the Principal are the educational and instructional leaders at EPCTC, in addition to being responsible for teacher supervision, evaluation, and providing input and approval of each faculty and staff member’s Goals. During the SCCOE site visit, it is noted that the Executive Director and the Principal are shared positions between EPCTC and EPAFLC. There are additional Instructional Leaders which are also utilized to manage the individual programs: EP TK-8 bilingual program; EP under 18 9-12; and EP over 19. The Instructional Leaders are essentially “principals” for each of the three programs, even though there are only two schools. The Principal and Instructional Leaders are required to possess valid teaching credentials, but administrative credentials are preferred. The Executive Director is encouraged to hold a valid administrative or teaching California credential from CTC or willing to pursue one (Highly Preferred). Currently, both the Executive Director and the Principal hold valid teaching and administrative credentials. The Instructional Leaders hold only a valid teaching credential but are not required to have administrative credentials.

For all the reasons above, SCCOE CSD Staff believes the educational program of EPCTC is not sound.

2. Ability to successfully implement the program set forth in the Petition

CSD Staff found facts demonstrating that the Petitioners are unlikely to successfully implement the program as written in the Renewal Appeal Petition in the areas of, but not limited to, governance, educational program, credentialing, financial and current charter violations. These areas are centered around issues, concerns, and notices which have been raised during the current charter term by ESUHSD and have been further verified by the CSD as part of the Renewal Appeal Petition review process.

Governance

SCCOE CSD Staff conducted a review of EPCTC's governance structure and governance practices and identified multiple anomalies. Inconsistencies exist among the Renewal Appeal Petition, Board Bylaws, board interviews, Form 990s, and the EPCTC website regarding the required number of board members. In addition, the Board has experienced multiple membership changes, with the most recent occurring on June 15, 2026.

SCCOE Staff also identified governance and transparency concerns through its review of Board agendas and meeting minutes. Staff determined that the Executive Director's most recent compensation package was approved during a special board meeting in violation of the Brown Act. Additionally, Board agenda descriptions lacked sufficient specificity for the public to determine the actions being considered. Further, none of the Board agendas or meeting minutes were translated into Spanish as required by Education Code Section 48985, despite the school serving a student population in which more than 15% speak a primary language other than English.

SCCOE Staff also identified concerns related to conflicts of interest and governance oversight. EPCTC does not have a nepotism policy. The Chair of the Board is the sibling of the Executive Director, and the Executive Director's spouse is employed by EPAFLC (per current Escuela Popular payroll records). In addition, the Form 990s inaccurately disclose familial relationships among the Executive Director, the Board Chair, and another employee, and these inaccuracies have remained uncorrected since 2018.

Although the EP Board Bylaws permit up to 49% of the governing board to consist of "interested persons," Education Code Section 47604.1(d) authorizes only charter school employees to serve as governing board members, subject to certain limitations. Additionally, Government Code Section 1090 prohibits public officials, including charter school governing board members, from having a financial interest in contracts made by their governing board. If a governing board member has a prohibited financial interest in a contract, the entire Board is prohibited from approving that contract. Recusal or abstention by the conflicted member does not cure the violation. Likewise, board members and employees may not participate in making contracts or other financial transactions, including leases, loans, or vendor agreements, in which they have a direct or indirect financial interest.

SCCOE Staff's review of the 2020 bond documents (see Object 38, below) also identified multiple individuals classified as "interested persons" who were employees or members of school leadership; however, the list does not appear to be complete. One of these employees continues to serve as a Board member. SCCOE Staff also noted that this Board member's daughter is employed by the school. While Education Code Section 47604.1(d) permits an employee to serve as a governing board member under certain circumstances, this additional familial relationship raises concerns regarding potential conflicts of interest and governance independence.

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Object 38: List of Related Parties from EP 2020 Bond Documents

Related Parties

Patricia Reguerin, the Executive Director of Escuela Popular, and Pablo Reguerin, the Chair of the Escuela Popular Board, are siblings. Richard Vaca, a teacher employed by Escuela Popular, is the brother-in-law of Pablo Reguerin. Roger Reguerin, a Student Resource Advocate employed by Escuela Popular, is the brother of Patricia Reguerin and Pablo Reguerin. Aleli Ochoa, a teacher employed by Escuela Popular, is the daughter of San Juana Ochoa, the Treasurer of the Escuela Popular Board.

The Escuela Popular Board has final approval over all compensation for all staff. Pursuant to Escuela Popular policy, since the Escuela Popular Board has members that are either employees themselves, or relatives of employees, only the impartial Escuela Popular Board members will approve compensation for employees. The Escuela Popular Board members with conflicts will excuse themselves from both the discussion and voting on these matters. Some of the Escuela Popular employees have relatives who are Escuela Popular Board members. These employees are allowed to make presentations to the impartial Escuela Popular Board members in order to provide information that is necessary for good decision making.

SCCOE Staff also identified additional governance concerns through its review of the school's lease and bond-related documents. The lease documents identify the president of the leasing company as the principal of the school. The lease was executed on behalf of EP by the Executive Director, who also serves as the supervisor of the president of the leasing party. This relationship raises additional concerns regarding governance independence and potential conflicts of interest.

Additionally, SCCOE Staff reviewed the defeasance documents associated with the school's bond financing and noted that Patricia Reguerin, Executive Director of Escuela Popular, is identified as the Chief Financial Officer (CFO) of the Escuela Popular Student Fund. However, the Form 990 for the Escuela Popular Student Fund identifies only two officers: President Olivia Cortez (Principal of EPCTC and EPAFLC) and Secretary Alberto Reyes (teacher at EPAFLC). Although Patricia Reguerin is identified as the CFO in the defeasance documentation, she is not listed as an officer on Form 990. This inconsistency raises additional questions regarding governance oversight, organizational reporting, and the accuracy of publicly filed documents.

Object 39: Signatures on the Lease Documents for EP

(Signature page of Lease Agreement)

The Parties hereto have executed this Lease as of the day and year first above written.

By LESSOR:

149 N. WHITE ROAD, LLC,
a California limited liability company

By: **ESCUELA POPULAR STUDENT FUND,**
a California nonprofit public benefit corporation

By: 
Olivia Cortez, President

By LESSEE:

ESCUELA POPULAR DEL PUEBLO,
a California nonprofit public benefit corporation


By: 
Patricia Reguerin, Executive Director

Object 40: Signature* on the Bond Defeasance Documents for EP

IN WITNESS WHEREOF, the parties hereto have caused this Escrow Agreement to be signed in their respective names by their duly authorized officers, all as of the day and year first above written.

149 N. WHITE ROAD, LLC, as Borrower

BY: ESCUELA POPULAR STUDENT FUND,
a California nonprofit public benefit corporation

By: 
Name: Patricia Reguerrin
Title: CFO

WILMINGTON TRUST, NATIONAL
ASSOCIATION,
as Escrow Agent and Trustee

**Also note the placement and font type for the signature block by Escuela Popular Student Fund. It does not match the rest of the font in the document and is not properly aligned, which may indicate that the signature block was added or replaced after the document was originally formatted.*

Per the Renewal Appeal Petition page 99, “The Board has adopted a Conflict of Interest Code necessary to comply with the Political Reform Act, Government Code Section 1090, *et seq.*, as set forth in Education Code Section 47604.1, and Corporations Code, including the Nonprofit Integrity Act, conflict of interest rules, and which shall be updated with any charter school-specific conflict of interest laws or regulations. As required, **the Conflict of Interest Code has been submitted for approval to the County Board of Supervisors** (emphasis added).” However, when SCCOE requested a copy of the County Board of Supervisors approval documents, EP staff stated that the Conflict of Interest Code has not been submitted to the County Board of Supervisors. It has only been approved by the EP Board. The requirement to change the Conflict of Interest Policy to a Conflict of Interest Code occurred January 1, 2020, and is required by Education Code 47604.1 which requires charter schools and charter management organizations to follow the exact same conflict of interest and open meeting laws that traditional public school districts follow. Based on the documentation reviewed, EP and EPCTC do not appear to be in compliance with EC 47604.1.

Educational Program

See above discussion on Educational Program.

Credentialing

On April 2, 2026, ESUHSD took action to revoke the EPCTC charter pursuant to Education Code Section 47607(f), determining that EPCTC: (1) committed material violations of the conditions, standards, or procedures set forth in its charter, and (2) violated applicable law. The violations primarily related to compliance with Education Code Section 47605(l), which, in part, requires that teachers in charter schools hold the Commission on Teacher Credentialing (CTC) certificate, permit, or other document required for their certificated assignment. These documents must be maintained on file at the charter school and are subject to periodic inspection by the chartering authority. Additionally, teachers assigned to provide instruction to English Learners (ELs) must hold the appropriate EL authorization in addition to

the credential required for their instructional assignment. These credentialing requirements are intended to ensure students receive instruction from appropriately authorized teachers.

ESUHSD conducted multiple reviews and documented its concerns through a Notice of Concern, Notice of Violation, Notice of Intent to Revoke, and the Final Revocation Action adopted on April 2, 2026. As part of the renewal appeal process, CSD Staff independently reviewed EPCTC credential records and human resources personnel files. During the initial review, SCCOE Staff identified several employees with expired credentials or documents approaching expiration. During the renewal site visit, EPCTC leadership explained that the expired documents were either not required for the employee's current assignment or that employees with credentials nearing expiration were not actively assigned to classroom instruction but remained "on-call" and therefore would not be assigned to teach. While these explanations addressed the school's staffing assignments, SCCOE Staff identified instances where personnel documentation did not align with the explanations provided or with credential records, findings that are generally consistent with concerns previously identified by ESUHSD.

As discussed above, CSD Staff also noted that the EPCTC Renewal Appeal Petition describes the educational program as "bilingual." Although the term appears only twice within the educational program description, its inclusion has credentialing implications. If the instructional program is represented as bilingual, teachers assigned to provide bilingual instruction would generally be expected to hold both an English Learner authorization and the appropriate bilingual authorization. SCCOE CSD Staff's review found that only eight of the school's 27 teachers currently hold bilingual authorizations. An additional teacher previously held a bilingual authorization that expired on March 1, 2026. When CSD Staff inquired about the expired authorization, EPCTC explained that the authorization was no longer required because the teacher's current assignment did not require bilingual instruction and, therefore, renewal was unnecessary.

SCCOE Staff also reviewed the school's compliance with required annual employee training and found that mandated training for all employees was not completed until May 2026. Required trainings—including, but not limited to, mandated reporter training, sexual harassment prevention, workplace violence prevention, and bloodborne pathogens—are generally expected to be completed within the first six weeks of the school year or within six weeks of an employee's date of hire. Documentation reviewed by SCCOE indicates that the required workplace violence prevention training was not assigned to EPCTC and EPAFLC employees until EP management began preparing for SCCOE's renewal site visit and document review. SCCOE's review of the submitted documentation reflects the annual training requirements expected of charter schools. In addition, page 113 of the EPCTC Renewal Appeal Petition states that "the Charter School shall establish, implement, and maintain at all times in all work areas an effective workplace violence prevention plan consistent with the requirements of Labor Code Section 6401.9," which also requires annual employee training.

Financial

See the above discussion on financial summary and the supplemental information on financial included later.

Current Charter Violations

As noted throughout this Staff Analysis, SCCOE CSD Staff have identified several charter violations by EPCTC, including but not limited to: failing to comply with appropriate filing of conflict of interest code with county board of supervisors, failing to comply with Brown Act, failing to appropriately and timely

train of employees, failure to collect student cumulative records, failure of staff to have appropriate credentials for “bilingual” education program, failing to create a School Site Council and English Learner Advisory Council for EPCTC, failing to file the appropriate Form 700’s, and failing to comply with EC 49501.5 and the National School Lunch Program to provide free meals to students on campus more than four hours. These identified charter violations continue to raise concerns with EPCTC’s ability to successfully implement the charter as written.

3. Affirmation of each of the conditions required by statute

SCCOE CSD Staff found the Petition contains the required affirmations.

4. Reasonably comprehensive description of the required elements

For the description of each element to be considered “reasonably comprehensive,” it is not enough for the Renewal Appeal Petition to include a description, but, rather, the description should be acceptable to SCCOE and be consistent with and not contrary to SCCOE’s standards and expectations for charter schools under its oversight. SCCOE’s indication that the description of an element is “reasonably comprehensive” should not be interpreted to mean SCCOE does not believe additional or different terms relating to an element would need to be agreed to by the Petitioner through the MOU and/or an addendum thereto. Further, while SCCOE may make recommendations for remediation in an area or specify issues or terms that have been or will need to be clarified or resolved through the MOU and/or an addendum thereto, this does not mean other areas may not need additional correction to be included in that MOU and/or in an addendum thereto.

However, this review is also an appeal of the denial by ESUHSD. SCCOE must ensure that any remediation suggestions do not constitute a material change from the Petition that was initially reviewed and denied by ESUHSD. Should changes be made to the Renewal Appeal Petition, other than to change the authorizer from ESUHSD to SCCOE, those changes would require the immediate remand of the Petition back to ESUHSD for consideration. Therefore, while SCCOE may recommend remediation actions for the charters on renewal which are currently authorized by SCCBOE, it may not require remediation actions for charters during appeal reviews.

The CSD Staff found, as detailed below, that EPCTC’s descriptions of the charter elements governing EPCTC’s educational program, measurable student outcomes, governance, and operations, including its compliance with the required charter elements are insufficient as currently constituted.

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Object 41: Summary of Reasonably Comprehensive Description Elements of the EPCTC Renewal Appeal Petition

Element	Does/ Does Not
A. Educational Program	Does Not*
B. Measurable Student Outcomes	Does Not*
C. Methods of Measuring Student Outcomes	Does*
D. Governance Structure	Does Not*
E. Employee Qualifications	Does*
F. Health and Safety Procedures	Does Not*
G. Student Population Balance: racial, ethnic, special education, and English Learner	Does*
H. Admissions Policies and Procedures	Does*
I. Annual Independent Financial Audits	Does**
J. Student Suspension and Expulsion Procedures	Does
K. Employee Retirement Systems	Does Not
L. School Attendance Alternatives	Does
M. Return Rights of Employees	Does Not
N. Dispute Resolution Procedures	Does**
O. Closure Procedures	Does Not

* EPCTC is not adhering to the Charter as currently written.

**Does not comply with SCCOE’s best practices.

A. Element One: Description of the Educational Program/Plan for Student Academic Achievement

The above discussion of whether the educational program is sound is incorporated herein by this reference. As stated above, EPCTC has an adult ELD instructional program embedded within a high school diploma program, even though it also states that the instructional program is “bilingual”. While the Renewal Appeal Petition describes and details the research and theory behind what may constitute a sound instructional program, the educational program is truly centered around serving adults who want to improve their English to acquire a better job. Most EPCTC students are not attending EPCTC to gain a diploma but are instead interested in learning English. Per EPCTC staff, many students drop out when they transition to English 1 or to any of the high school content courses, as evidenced by the high number of students who remain in 9th grade. For example, during the student/family interview panel, which was selected by EPCTC and EP staff, one student stated they had been attending EPCTC for 12 years and were now a 12th grader and ready to graduate, yet that student still requested translation services to participate in the interview. CSD Staff is concerned regarding the lack of academic growth, the primary focus on ELD support, the lack of grade level progress, the lack of academic rigor, the lack of state testing accountability numbers, and the overall lack of direct instruction occurring at EPCTC.

The Charter Schools Department Staff believe this section does not include a reasonably comprehensive description and EPCTC is not adhering to the charter as currently constituted.

B. Element Two: Measurable Student Outcomes

EPCTC student outcomes are “aligned to the State Standards and California content standards, and the State Priorities to provide adult students with a relevant, challenging, and authentic learning experience in education.” Key outcomes include meeting or exceeding individual

student growth targets in reading and mathematics, meeting one year DASS graduation rates, having teachers appropriately credentialed, having students attend college, retaining students, meeting attendance rates and survey participation. These outcomes align with the Eight State Priorities required by California’s Local Control and Accountability Plan (LCAP), ensuring that the school addresses core areas like academic achievement, student engagement, and school climate. In reviewing the growth targets, some of these metrics were looking for growth but others had reduced the required alternative metric targets established with ESUHSD (see Object 42 below).

Object 42: Comparison of Alternative Metrics and Expected Annual Measurable Outcomes

Outcomes	Current Target – 2018-2026	Proposed Target – 2026-2031
Attendance Rate	Meet or exceed an average of 75% yearly attendance	Average attendance rate will reach 81% for all students and each significant subgroup
NWEA ELA growth target	40% of over 19 students meet ELD growth target	60% of all students will meet or exceed NWEA growth target
NWEA Math growth target	55% of over 19 students meet Math growth target	45% of all students will meet or exceed NWEA growth target
Graduation Rate	80% of seniors will graduate within their senior year	70% of seniors will graduate within their senior year
Student Participation on TEN Feedback Loop	80% of student participation on the TEN feedback loop	60% of all enrolled students will participate in the annual student satisfaction survey
Credits Completion	Complete 70% of total credits attempted	Complete 75% of credits attempted annually
Increase number of enrolled long term students	10% increase in number of continuously enrolled/long-term students	40% of all students and each significant subgroup will remain enrolled 30 days or more
Teacher Credentials*		100% will be credentialed
College Going Rate*		40% of all students and each significant subgroup will attend college

**These metrics were not initially included in the alternative metrics but were included as part of the measurable outcomes. When compared to previous data for the metric, color-coding determines if growth for the metric is sought.*

It should be further noted that the information for the baseline year of 2023-24 and year 1 as 2024-25 in the annual measurable outcomes are not accurate for the Renewal Appeal Petition. The baseline year should be 2024-25 as it is the most recent completed year of data. Year 1 should be the growth target from the 2025-26 LCAP. Year 5 is correct as it is the last year of the requested renewal charter term for 2030-31.

EPCTC’s Renewal Appeal Petition includes a Local Control Accountability Plan (LCAP) which addresses all eight required elements. EPCTC’s Renewal Appeal Petition affirms that these outcomes cover a broad range of student skills, from academic performance to social-emotional well-being. In the Renewal Appeal Petition, EPCTC commits to continually updating its goals and performance expectations to reflect the evolving needs of students and state requirements.

The Charter Schools Department Staff believe this section does not include a reasonably comprehensive description and EPCTC is not adhering to the charter as currently constituted.

C. Element Three: Method by Which Pupil Progress in Meeting Outcomes will be Measured

To measure the student outcomes listed in Element B, EPCTC utilizes several standardized assessments. These include the Smarter Balanced Assessments for English Language Arts, Mathematics, and Science, and the California Standards Test for Science for 11th graders. English Learners are assessed annually through the English Language Proficiency Assessments for California (ELPAC). However, because so few 11th grade students are identified, State testing for EPCTC is essentially non-existent.

EPCTC also states it will utilize NWEA MAP scores, however, due to the high transiency of the EPCTC population, consistent assessment Administration is not feasible, which limits the usefulness of the assessment data presented.

The Charter Schools Department Staff believe this section does include a reasonably comprehensive description, however, EPCTC is not adhering to the Charter as currently constituted.

D. Element Four: Governance Structure

In accordance with Education Code Section 47604, EPCTC and EPAFLC are governed by Escuela Popular del Pueblo ("EP"), a California nonprofit public benefit corporation with 501(c)(3) status. EP is governed by a Board of Directors ("Board") pursuant to its corporate bylaws. The bylaws submitted as part of the Renewal Appeal Petition were adopted in 2000. Good governance practices recommend that governing bylaws be periodically reviewed and updated. While it is possible the bylaws have been amended during the past 26 years, no updated bylaws were included with or provided as part of the Renewal Appeal Petition.

CSD Staff identified numerous inconsistencies regarding the composition of the EP Board. Per the bylaws, at least two Board seats are reserved for representatives from the Center for Training and Careers (CTC), now ConXion, EPCTC's exclusive Workforce Innovation and Opportunity Act (WIOA) partner. Page 97 of the Renewal Appeal Petition states that the Board consists of ten directors, including two CTC representatives and seven Escuela Popular representatives. However, the current Board roster included in the Renewal Appeal Petition lists only seven members. Similarly, the EP website identifies seven Board members, while a separate Board roster posted on the same website lists only five members. Documents submitted by EP, including Forms 990 filed from 2018-19 to 2024-25, also contain inconsistent Board membership information (see Objects below).

Object 43: The EP Board Bylaws Regarding the Number of Board Members

SECTION 2. NUMBER OF DIRECTORS.

The authorized number of directors shall be seven.

Data collected from EP Board Bylaws as presented in the EPCTC Renewal Appeal Petition

Object 44: EP Board Members at time of Renewal Submission as per EPCTC Renewal Appeal Petition

Table D.1: Board of Directors at the time of Submission

	Curriculum, Instruction, Assessment, Student Services	School Administration & Finances	Project Management, Strategic Planning	Business & Financial Management	Facilities, Real Estate	Fundraising, Grant Writing, Donor Relations	Governance, Law, Compliance	Community Outreach, Communications	Term
Dr. Pablo Reguerin- President/Chairperson – CTC Representative	X	X	X	X		X	X		11/30/25-11/30/26
Dr. Bernard Gifford- Vice Chairperson	X	X	X	X	X		X		11/30/25-11/30/26
San Juana Ochoa- Secretary	X	X	X			X	X	X	11/30/25-11/30/26
Dr. Ellen Middaugh- Treasurer	X	X	X			X	X	X	11/30/25-11/30/26
Maria del Rocio Preciado- Member			X			X	X	X	11/30/25-11/30/26
Robert Escobar - Member	X	X	X	X	X		X	X	11/30/25-11/30/26
Dr. Sherry Segura- Member	X	X	X			X	X	X	11/30/25-11/30/26

Data collected from EPCTC Renewal Appeal Petition

Object 45: Current EP Board Members per the Escuela Popular Website as of June 1, 2026

Board Member Roster
ESCUELA POPULAR DEL PUEBLO
 2025-2026
 149 North White Road, San Jose, CA
 95127 Phone: 408-275-7191
 www.escuelapopular.org

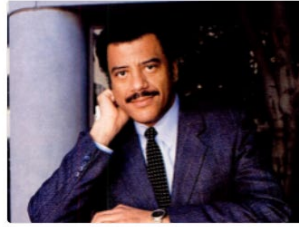
	LAST	FIRST	PHONE	EMAIL	TITLE/TERM
1	Gifford	Bernard	650-544-6683	bgifford@escuelapopular.org berniegifford@hotmail.com	Vice Chair November 17, 2025 - Nov. 30, 2026
2	Ochoa	San Juana	408-426-6587	sanjuanaochoa@escuelapopular.org	Secretary November 17, 2025 - Nov. 30, 2026
3	Ramos Chavez	Lori	408-213-0961 ext23	loriramoschavez@escuelapopular.org	Member February 17, 2025 - Nov. 30, 2026
4	Reguerin	Pablo	831-428-2839	preguerin@escuelapopular.org	Chair November 17, 2025 - Nov. 30, 2026
5	Maciel	Martha	408-981-3655	marthamaciel@escuelapopular.org	Member May 18, 2026 - Nov. 30, 2026

Data collected from <https://www.escuelapopular.org/wp-content/uploads/2026/05/EPBoardDirector-Roster25.26V3.pdf>

**Object 46: Current EP Board Members per the Escuela Popular Website as of June 1, 2026,
Photos of Members**



Pablo Reguerin - Chair, Board of Directors



Bernard Gifford, Ph.D. - Treasurer, Board Member



San Juana Ochoa -Secretary, Board Member



Mayra Mejia -- Vice Chair



Maria del Rocio Preciado - Treasurer, Board Member



Robert Escobar, Board Member



Ellen Middaugh, Board Member

Photos collected on June 1, 2026, from <https://www.escuelapopular.org/agenda-approved-board-meeting-minutes-2025-26/>

Beyond the inconsistencies in Board composition, CSD Staff also identified concerns regarding Board continuity and governance stability. During the past year, several Board members joined or left the Board, with the most recent change occurring on June 15, 2026. Additionally, all Board terms expire on the same date—November 30, 2026—with no evidence of staggered or rotating terms to promote continuity and institutional knowledge.

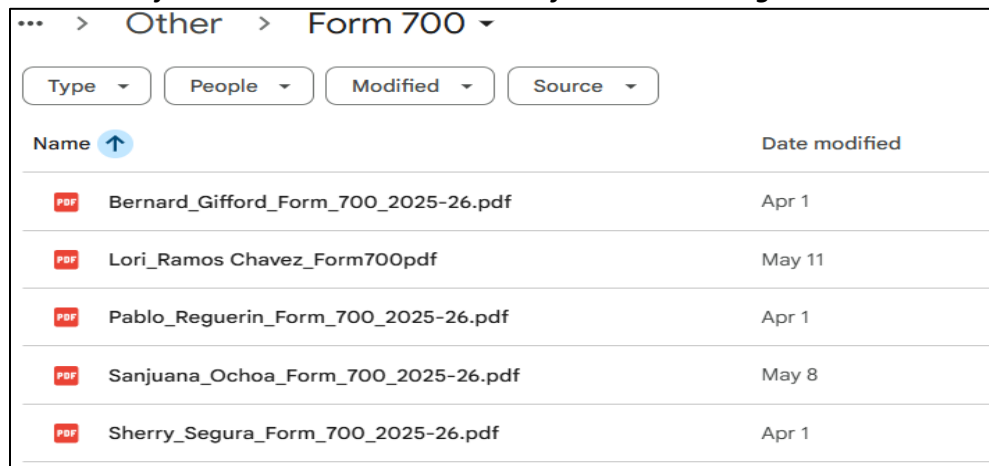
Interviews conducted during the renewal site visit demonstrated that EPCTC students value their school and are eager to participate in its governance. Students indicated they were aware that EPAFLC maintains both a School Site Council (SSC) and an English Learner Advisory Committee (ELAC); however, no comparable advisory bodies exist for EPCTC, and students expressed a desire to have similar opportunities to provide input. Although EPCTC primarily serves adult learners, the school should identify meaningful opportunities to incorporate student and parent voice into its governance processes. This concern is particularly significant given that more than 20 percent of EPCTC's student population are English Learners, yet EPCTC has not established an ELAC or an SSC comparable to those available at EPAFLC.






The Renewal Appeal Petition states that EPCTC will comply with the Brown Act, Education Code Section 47604.1, the California Public Records Act, the Fair Political Practices Act, and Government Code Section 1090, and Board members will receive mandatory ethics training at least every other year pursuant to AB 2158. The most recent Board governance training was conducted by Young, Minney & Corr on November 17, 2025.

Board meetings are generally held quarterly, with special meetings scheduled as necessary. However, CSD Staff's review of Board agendas and meeting minutes found that the meeting schedule did not consistently align with statutory reporting deadlines. As a result, several required reports were approved after they had already been submitted or after the applicable statutory deadline had passed. For example, the School Accountability Report Card (SARC), required to be approved and posted by February 1, was not approved until February 17, 2026. Likewise, the Annual Audit, due by December 15, was approved on February 17, 2026, and the 2024-25 Unaudited Actuals, due by September 15, were not approved until November 17, 2025. These actions raise concern regarding Board oversight and timely governance of required fiscal and accountability reporting.

The Renewal Appeal Petition further states that the Board has adopted a Conflict of Interest (COI) Code that has been "submitted to the County Board of Supervisors for approval" (p. 99). However, when CSD Staff requested documentation confirming approval, EP leadership stated that the COI Code had not been submitted to the County Board of Supervisors. This inconsistency indicates that the information contained in the Renewal Appeal Petition is inaccurate and raises concerns regarding compliance with the school's charter and applicable legal requirements. Pursuant to the Political Reform Act and the EP Conflict of Interest Code, all designated Board members and identified EP and EPCTC leadership are required to annually file a Form 700, Statement of Economic Interests. CSD Staff requested the current Form 700 filings and received only five completed forms. The submitted filings did not correspond to the positions identified in the Conflict-of-Interest Code. In addition, no Form 700 filings were provided for any designated employees. Given the number of Board members, changes in Board membership during the year, and the positions identified within the Conflict-of-Interest Code, substantially more filings should have been submitted (see Object 47, below). Furthermore, several of the submitted Form 700s were not completed by the April 1 filing deadline, as evidenced by the document modification dates.

Object 47: EP Form 700 Submission for Review During Site Visit



Name	Date modified
 Bernard_Gifford_Form_700_2025-26.pdf	Apr 1
 Lori_Ramos Chavez_Form700pdf	May 11
 Pablo_Reguerin_Form_700_2025-26.pdf	Apr 1
 Sanjuana_Ochoa_Form_700_2025-26.pdf	May 8
 Sherry_Segura_Form_700_2025-26.pdf	Apr 1

Data provided by EPCTC

The Renewal Appeal Petition authorizes the Board to delegate implementation of its duties, except those specifically prohibited by law, to employees or other responsible parties. Currently, the Board delegates day-to-day operational authority to the Executive Director, while the Principal serves as the senior administrator at the school site. However, ultimate organizational authority remains with the Board, including decisions that may not be delegated, such as any decision regarding the closure of EPCTC.

The Charter Schools Department finds that the Renewal Appeal Petition does not provide a reasonably comprehensive and accurate description of the school's governance structure as required by Education Code Section 47605(c)(5)(D). CSD Staff identified significant inconsistencies between the Renewal Appeal Petition, the Board bylaws, Board rosters, Forms 990, the EP website, and documents provided by the school. Collectively, these findings raise concerns regarding Board composition, governance continuity, stakeholder participation, Board oversight, transparency, and compliance with applicable governance requirements. Based on the evidence reviewed, CSD Staff concludes that EP is not consistently operating in accordance with the governance structure described in its charter.

The Charter Schools Department Staff believe this section does not include a reasonably comprehensive description and EP is not adhering to the charter as currently constituted.

E. Element Five: Employee Qualifications

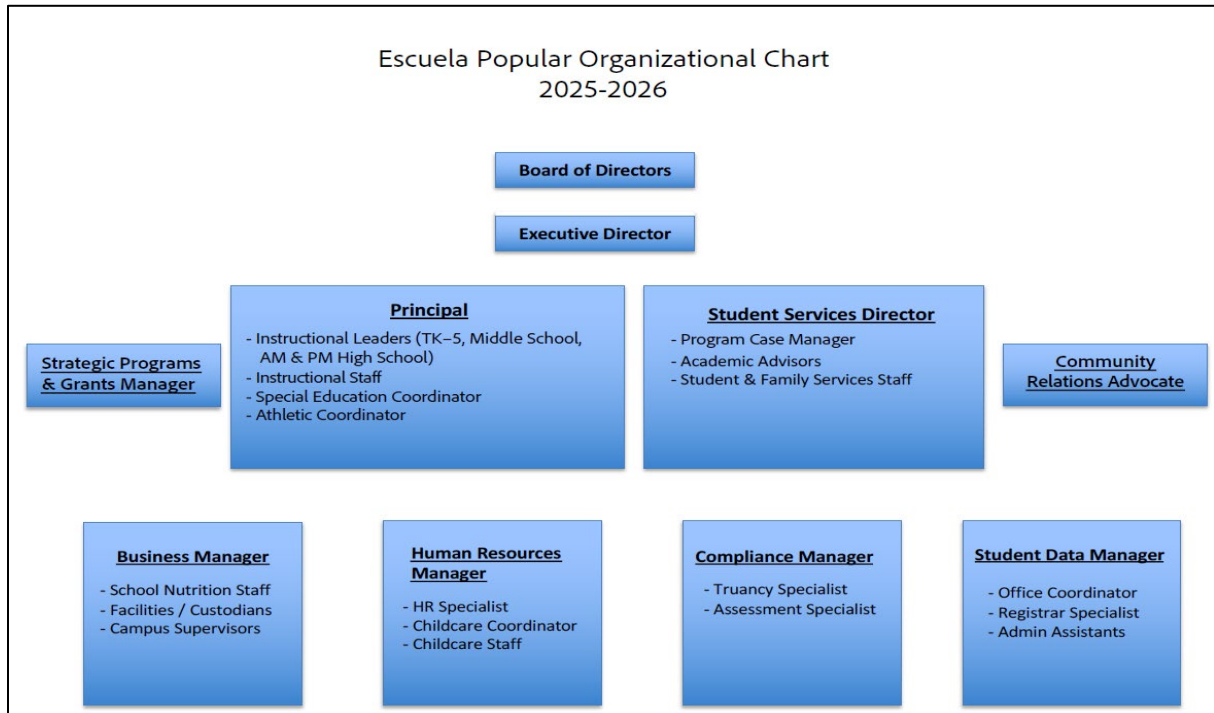
The Renewal Appeal Petition states that EP recruits professional, effective, and qualified personnel for all administrative, instructional support, and non-instructional support capacities who believe in the instructional philosophy outlined in its vision statement. In accordance with Education Code 47605(b)(5)(e), EP shall be nonsectarian in its employment practices and all other operations. EP shall not discriminate against any individual (employee or student) on the basis of the characteristics listed in Education Code Section 220 (actual or perceived disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic that is contained in the definition of hate crimes set forth in Section 422.55 of the Penal Code, including immigration status, or association with an individual who has any of the aforementioned characteristics).

EPCTC stated it began operation for 2025-26 having to pivot to ensure all teachers had the appropriate Commission on Teacher Credentialing (CTC) credentials rather than Career Technical Education (CTE) credentials and it has continued to work diligently with ESUHSD, through its oversight concerns and revocation process, to make sure that the teaching staff are appropriately credentialed and fulfilling all the legal requirements for them to perform as teachers through the sharing of staff between EPCTC and EPAFLC or through the use of temporary staff (substitute teachers). However, while EPCTC staff may now have the appropriate teaching credentials to teach ELD, the Renewal Appeal Petition still states in two places that EPCTC is a “bilingual” program and as such, all teachers would need to have bilingual authorizations to teach, which they do not.

In reviewing the positions listed in the Renewal Appeal Petition, SCCOE CSD Staff noted that there is no description of “childcare provider.” EPCTC provides childcare to its adult students for them to access class time. Descriptions are provided include: Executive Director, Principal, Student Services Director, Instructional Leader, Special Education Coordinator, Educational Specialist, High School Teacher, Paraprofessional, and Support Staff. While childcare licensure is

not required as the parents of the children are on campus, there is no indication as to whether the childcare providers have the appropriate training and certifications. Further, it is unclear why the childcare coordinator and childcare staff are under the supervision of the Human Resources Manager.

Object 48: Escuela Popular Organizational Chart



The Charter Schools Department Staff believe this section does include a reasonably comprehensive description, however, EPCTC is not adhering to the Charter as currently constituted.

F. Element Six: Health and Safety

The Renewal Appeal Petition specifies that EPCTC maintains and regularly reviews and updates Board-approved policies and procedures to ensure the health and safety of students and staff. EPCTC provided an overview of Health and Safety Policies and Procedures and the process for employee fingerprinting and background checks. All staff are expected to comply with Ed. Code 47605(c)(5)(f), Education Code Section 44691, and all other legal requirements, and EPCTC states it is committed to providing a safe, compliant working environment.

EPCTC states on p. 110, that “[a]ll enrolled students who receive classroom-based instruction will be required to provide records documenting immunizations as is required at all public schools pursuant to Health and Safety Code Sections 120325-120373, and Title 17, California Code of Regulations 6000-6075.” Upon review of the student cumulative records for students at EPCTC, CSD Staff discovered that only the enrollment application for EPCTC students were being collected, no other documentation was “necessary” as these students were “adults”. Based on the documentation reviewed, EPCTC appears to be in violation of its own charter for failing to comply with student immunization records and student cumulative record acquisition and retention.

EPCTC submitted its 2025-26 Safety Plan and declared that EPCTC will review and update the plan by March 1 of every year and that the plan shall include the required safety topics. The Renewal Appeal Petition specifies that its Employee Handbook, School Safety Plan, and Student/Parent Handbook are all reviewed, updated, and presented to the EP Board annually for approval to ensure ongoing compliance with state and federal laws and regulations. EPCTC has updated its description of health and safety policies and procedures to address some changes and new requirements of law that have gone into effect since its Charter was last renewed. While the Charter is not required to list every applicable law, EPCTC remains obligated to comply with legal mandates. CSD Staff notes the Renewal Appeal Petition does not specifically refer to compliance with Title IX, including adoption and maintenance of appropriate policies and compliance with all training requirements, the requirements regarding background checks and reporting pursuant to AB 848, and compliance with the requirements for a transportation safety plan.

SCCOE CSD Staff reviewed the nutrition services provided to EPCTC students. As a Charter High School, EPCTC must conform with EC 49501.5 and the National School Lunch Program which provides that any school serving students TK-12, provide two meals free of charge during each school day to students requesting a meal regardless of their free or reduced price meal eligibility. EPCTC serves a high need population and therefore would need to provide two meals for students who attend more than four (4) hours per day. EPCTC contracts out its PM program meal, but these meals are not free to the EPCTC students and the PM program runs from 4:00 pm to 10:40 pm, which is more than four hours. Per the CDE website, "all students attending public school districts, county offices of education and charter school are eligible". Therefore, EPCTC is in violation of EC 49501.5.

The Charter Schools Department Staff believe this section does not include a reasonably comprehensive description and EPCTC is not adhering to the Charter as currently constituted.

G. Element Seven: Racial, Ethnic, English Learner, and Special Education Balance

On July 1, 2020, AB 1505 took effect, updating Element G to require schools to provide a reasonably comprehensive description of how the school will achieve a balance of racial and ethnic pupils, special education pupils, and English learner pupils, including redesignated fluent English proficient pupils, reflective of the general population residing within the territorial jurisdiction of the district to which the EPCTC charter was initially submitted, which, as previously established, is ESUHSD. EPCTC claims its Renewal Appeal Petition has been updated consistently with these revised requirements.

Object 49, below, demonstrates that EPCTC's student demographic distribution is not largely reflective of the surrounding East Side Union High School District (ESUHSD) nor the comparison schools that EPCTC students would otherwise have attended. The Hispanic or Latino population at EPCTC is 100%, substantially higher than the 54.1% at ESUHSD. The Renewal Appeal Petition states, "To create a school community that reflects the diversity of the general population residing within the District, EPCTC strives to recruit students from a range of racial, ethnic, ability, linguistic, and socioeconomic backgrounds," yet 100% of EPCTC is Hispanic or Latino.

Object 49: Comparison of 2025-26 Demographic Data Among EPCTC, ESUHSD, and Comparison Schools

	Hispanic or Latino	Asian	Filipino	White	African American	Two or More Races
EPCTC	100%	0.0%	0.0%	0.0%	0.0%	0.0%
ESUHSD	54.1%	31.4%	5.5%	4.3%	1.4%	2.6%
Apollo	87.0%	6.1%	1.5%	0.8%	1.5%	0.8%
Broadway	90.5%	1.4%	0.7%	2.0%	2.7%	2.0%
OYA	87.4%	0.6%	0.3%	5.4%	3.9%	1.8%
SJCCC	86.5%	3.2%	1.1%	4.9%	1.1%	1.1%
EPAFLC	99.8%	0.0%	0.0%	0.0%	0.0%	0.2%
Foothill	92.2%	2.8%	0.9%	0.9%	0.9%	0.5%
James Lick	84.3%	6.6%	3.3%	2.9%	1.4%	0.8%
LCPA	99.1%	0.5%	0.0%	0.5%	0.0%	0.0%

Data gathered from Dataquest: <https://data1.cde.ca.gov>

Object 50, below, highlights differences in student group populations between EPCTC, ESUHSD, and the comparison schools EPCTC students would otherwise have attended. Notably, EPCTC has a lower percentage of ELs at 19.8% compared to 22.8% in ESUHSD, and slightly lower percentages compared to other comparison schools. However, EPCTC’s SWD population is significantly lower at 0.2% compared to 12.9% in ESUHSD as EPCTC only had one student with disabilities. The SED population at EPCTC, at 75.0%, is comparable to ESUHSD but less than the comparison schools.

Object 50: Comparison of 2025-26 Student Group Data Among EPCTC, ESUHSD, and Comparison Schools

	Total Number of Students	SED	EL	SWD	Homeless
EPCTC	420	75.0%	19.8%	0.2%	20.5%
ESUHSD	22,560	71.3%	22.8%	12.9%	5.1%
Apollo	131	93.9%	39.7%	6.1%	13.0%
Broadway	147	74.1%	48.3%	24.5%	4.1%
OYA	333	87.1%	25.2%	20.4%	24.6%
SJCCC	185	90.3%	35.7%	24.9%	11.4%
EPAFLC	410	82.7%	36.8%	13.6%	13.1%
Foothill	217	93.1%	33.2%	12.0%	31.3%
James Lick	788	89.3%	30.7%	17.8%	7.9%
LCPA	427	82.7%	36.8%	13.6%	13.1%

Data gathered from Dataquest: <https://data1.cde.ca.gov>

EPCTC’s recruitment plan utilizes strategies to attract a student population reflective of ESUHSD. The plan includes both outreach and admissions practices designed to reach its target population instead of ensuring diversity in racial, ethnic, and special student populations. Recruitment materials are printed in English and Spanish, “as well as other languages as the need arises” (p. 116), however, no other languages have been utilized to accommodate the “diverse” population and partnerships are formed with local organizations.

Object 51: EPCTC Demographic Data from 2017-18 to 2025-26

	Total Number of Students	Hispanic or Latino %	Asian %	Filipino %	White %	African American %	Two or More Races %
2017-18	697	99.3	0.0	0.0	0.1	0.0	0.3
2018-19	643	98.6	0.0	0.0	0.0	0.0	0.9
2019-20	590	98.3	0.0	0.0	0.0	0.0	0.7
2020-21	414	100	0.0	0.0	0.0	0.0	0.0
2021-22	415	100	0.0	0.0	0.0	0.0	0.0
2022-23	528	100	0.0	0.0	0.0	0.0	0.0
2023-24	289	100	0.0	0.0	0.0	0.0	0.0
2024-25	658	99.4	0.0	0.0	0.0	0.0	0.2
2025-26	420	100	0.0	0.0	0.0	0.0	0.0

Data gathered from Dataquest: <https://data1.cde.ca.gov>

Object 51, above, shows that EPCTC’s racial and ethnic demographic composition has remained relatively stable from 2017-18 to 2024-25, particularly for the Hispanic or Latino population, which consistently represents most students. The Hispanic or Latino percentage has ranged from 98.3% to 100%, with the most recent year (2025-26) showing 100%. The other demographic groups vary from year-to-year as various families move in and out of EPCTC.

Object 52: EPCTC Student Group Data from 2017-18 to 2025-26

	Total Number of Students	Percentage of SED	Percentage of EL	Percentage of SWD	Percentage of Homeless
2017-18	697	90.8	98.9	0.0	53.7
2018-19	643	92.2	98.4	0.2	58.9
2019-20	590	94.4	99.5	0.0	65.3
2020-21	414	80.4	9.9	0.0	6.5
2021-22	415	84.6	14.7	0.0	11.3
2022-23	528	84.5	19.1	0.0	13.8
2023-24	515	82.3	17.3	0.2	14.8
2024-25	658	96.5	20.1	0.2	81.0
2025-26	420	75.0	19.8	0.2	20.5

Data gathered from Dataquest: <https://data1.cde.ca.gov>

Object 52, above, indicates that the EL population at EPCTC has fluctuated over the years with a range of 99.5% to 9.9%; currently EL is 19.8%, however, EPCTC states the EL percentage is 99% as students over age 22 are not included in the percentage established by the State. The percentage of SWD has also fluctuated with a range of 0% to 0.2%, currently SWD is 0.2%, as there is only one student with disabilities between age 19 and 22. The percentage of SED students fluctuated, staying between 90.8 and 75%, with a current level of 75%. EPCTC also includes a homeless population which has fluctuated from 81% to 6.5%, with a current level of 20.5%. These data points reflect a consistently high-need student population, particularly in terms of SED, Homeless and EL students, which comports with the intent and purposes of the Charter Schools Act.

The Charter specifies that EP will “continue to engage in ongoing recruitment and outreach efforts as described above with the continued development of marketing materials, advertising, online and social media presence, hosting and attendance of community events, and continued efforts to establish community partnerships. The Charter School budget includes financial resources allocated to outreach efforts.” However, as the population at EPCTC does not align with ESUHSD or show a diverse student body, CSD Staff is concerned due to the lack ongoing review and refinement of this plan and EPCTC’s recruitment efforts.

The Charter Schools Department Staff believe this section does not include a reasonably comprehensive description and EPCTC is not adhering to the Charter as currently constituted.

H. Element Eight: Admissions Policies and Procedures

EPCTC says it has articulated student admission policies and procedures. The school is nonsectarian, tuition free, and does not discriminate against any pupil based on protected characteristics.

With the changes to the Charter Schools Act since EPCTC’s most recent renewal, the actual policies and procedures for admission – including how EPCTC implements the admission preferences, conducts the public random drawing (lottery) admission procedures, adds students to the waitlist, and offers them admission from the waitlist – must also be included in the Renewal Appeal Petition. EPCTC states that it utilizes a “rolling admission process to better serve students who are historically transient and thus has not had to participate in a public random drawing” (p. 119).

Admission to the school is not determined by the place of residence of pupils or parents, except in the case of public random drawing, as allowed by law.

The Renewal Appeal Petition contains the following preferences in the following order:

1. Sibling(s) students admitted to or attending the Charter School
2. Students who are currently enrolled in or who reside in the elementary school attendance area of the local public elementary school where the Charter School is located (for purposes of the SB 740 Charter School Facility Grant Program)
3. Students residing within the District’s boundaries
4. All other students

EPCTC’s Renewal Appeal Petition states “After admission, students will be required to submit an enrollment packet, which shall include the following:

- Student Enrollment Form (See Appendix 29 Enrollment Form)
- Proof of Immunizations
- Report of Health Exam for School Entry
- Home Language Survey
- Completion of Emergency Medical Information Form or Proof of age requirements
- Release of records⁷
- Student signatures on the Student and Family Handbook Acknowledgement

The Charter School will maintain records of the above activities.”

However, upon review of the EPCTC student cumulative records, these items were not present. When SCCOE CSD Staff inquired as to the missing required documentation, EPCTC staff stated these documents were not necessary as the students were “adult students.” Failure to collect the appropriate documentation is in violation of the Charter as stated on pp. 120-121.

The Charter Schools Department Staff believe this section does not include a reasonably comprehensive description.

I. Element Nine: Financial Audit

EPCTC states in the Renewal Appeal Petition that the audit will be conducted in accordance with Education Code Sections 47605(c)(5)(l) and 47605(m), generally accepted accounting procedures, and with applicable provisions within the California Code of Regulations governing audits of charter schools as published in the State Controller’s K-12 Audit Guide. The Renewal Appeal Petition describes EPCTC financial audit procedures, including how the independent auditor will be selected and retained, the qualifications required of the auditor, the timing of the audit, and the process for resolving audit exceptions and deficiencies.

The Renewal Appeal Petition states that the Governing Board will select an independent auditor through a request for proposal process. The Executive Director, along with the audit committee, if any, will oversee completion of the annual audit. Audit exceptions and deficiencies will be reviewed by school leadership and reported to the Governing Board with recommendations for corrective actions.

However, EP and EPCTC do not have an audit committee nor a financial committee. During the financial interview and the Board member interviews as part of the renewal site visit, SCCOE CSD Staff were informed that audit and financial committees were not necessary as these matters were addressed with the whole board. While these matters are discussed with the whole board, it should be noted that there are significant governance issues with conflicts of interest as discussed in Element D.

The Charter Schools Department Staff believe that this section does include a reasonably comprehensive description, however, it does not conform to SCCOE’s best practices for charter schools.

J. Element Ten: Student Suspension/Expulsion Procedures

EPCTC’s Renewal Appeal Petition includes its comprehensive suspension and expulsion policies and procedures that have generally been updated to reflect current law, in the Student/Parent Handbook attached as Appendix 10 to the Renewal Appeal Petition, which is attached and fully incorporated by reference into the Renewal Appeal Petition. The Charter Schools Act requires the Charter to provide a reasonably comprehensive description of the procedures for suspension and expulsion from EPCTC. As such, EPCTC may not substantively revise the causes or procedures, except to comport with requirements of law or to track revisions to the causes and procedures applicable to non-charter California public schools, without determination from the authorizer whether the proposed revision(s) is a material revision to the Renewal Appeal Petition. The statement in the Renewal Appeal Petition to the contrary, claiming authority for EPCTC unilaterally to amend these policies and procedures, is incorrect.

The other policies and procedures are generally consistent with SCCOE's expectations for best practices and with the changes to this portion of the Charter Schools Act.

The Charter Schools Department Staff believe this section does not include a reasonably comprehensive description.

K. Element Eleven: Employee Retirement System

The EPCTC Renewal Appeal Petition states all eligible certificated employees of EPCTC may participate in the State Teachers Retirement System (STRS) (but does not specify the retirement system for certificated employees who are not eligible to participate in STRS), and non-certificated employees will participate in the federal social security system and a qualified retirement system. The Renewal Appeal Petition also states that employees may also participate in the EP-sponsored 401(k) retirement program. EP Human Resources manager ensures that appropriate arrangements for each employee have been made available.

The Charter Schools Department Staff believe this section does not include a reasonably comprehensive description.

L. Element Twelve: Public School Attendance Alternatives

EPCTC is a school of choice, specifically for adults. No student is required to attend. Students may attend the charter school or other district schools or pursue an intra- or inter-district transfer in accordance with existing district enrollment and transfer policies. Parents and guardians of each student enrolled in EPCTC will be informed their students have no right to admission to a particular school of any local education agency because of enrollment in EPCTC, except to the extent such a right is extended by the local education agency.

The Charter Schools Department Staff believe this section does include a reasonably comprehensive description.

M. Element Thirteen: Description of the Rights of An Employee of the County Superintendent of Schools, Upon Leaving the Employment of the County Superintendent of Schools, to be Employed by the Charter School

Upon appeal to the County Board of Education, EPCTC should have updated this element of the Charter to address the rights of employees of the County Superintendent of Schools who choose to leave the employment of the County Superintendent to work at the Charter School, and any rights of return to the County Superintendent's employment after employment at the Charter School. EPCTC did not update this element of the Charter at that time, so all references in the Charter continue to be employed by a public school district and rights of district employees.

The Charter Schools Department Staff believe that this section does not include a reasonably comprehensive description.

N. Element Fourteen: Dispute Resolution

EPCTC includes a proposed dispute resolution procedure in the Renewal Appeal Petition. However, EPCTC cannot bind the County to any dispute resolution process to which it did not agree. As part of the SCCOE standards of excellence contained in the MOU, EPCTC has agreed to

the terms which are set forth in the MOU and upon approval replaces the language proposed in the Charter.

The Charter Schools Department Staff believe that this section does include a reasonably comprehensive description, however, this language cannot bind the SCCOE to any language to which it did not agree.

O. Element Fifteen: Closure Protocol

EPCTC outlines an adequate process to be used if the charter school closes. Once documented as official action by EP Board, there is a process addressing notification of all entities, and to ensure smooth transition of students/records to suitable alternative programs. EPCTC will provide a final audit, and plans for disposition of assets and liabilities and transfer of public records. On closure, the school shall remain solely responsible for all liabilities arising from the operation of the school. As a non-profit public benefit corporation, should the corporate entity be dissolved the EP Board will follow the California Corporation Code for the dissolution and file all necessary filings with appropriate state and federal agencies.

The Charter Schools Department Staff believe that this section does include a reasonably comprehensive description, however, it does not conform to SCCOE's best practices for charter schools.

Required Supplemental Information

CSD Staff reviewed the EPCTC Renewal Appeal Petition, which includes the budget narrative, projected budget, and cash flow for Fiscal Years (FY) 2025-26 through 2030-31. CSD Staff also reviewed supplemental documents and the public hearing information to assess and provide clarification on EPCTC's financial position. The supplemental documents include, but are not limited to, financial audits, monthly financial statements, state-required financial reports, annual visit documents, and the Fiscal Crisis Management Assessment Team (FCMAT) Local Control Funding Formula (LCFF) Calculator, which CSD Staff recreated to recalculate the LCFF Revenue sources reported in the Renewal Appeal Petition for accuracy.

Enrollment & Average Daily Attendance (ADA)

Object 53, below, presents EPCTC's historical and projected enrollment and Average Daily Attendance (ADA) data from FY 2018-19 through FY 2030-31. SCCOE Staff acknowledges that, unlike traditional comprehensive high schools, EPCTC serves a unique population of adult learners seeking to complete high school requirements, improve English language proficiency, and re-engage with education after interruptions in their academic careers. As a result, student mobility, enrollment fluctuations, and attendance patterns may differ from those of traditional K-12 educational programs.

Historically, EPCTC's enrollment fluctuated considerably during the review period. Enrollment declined from 643 students in FY 2018-19 to 414 students in FY 2020-21, representing a decrease of 229 students, or approximately 36%, over a two-year period. Enrollment subsequently rebounded to 528 students in FY 2022-23 before declining slightly to 515 students in FY 2023-24. In FY 2024-25, enrollment increased significantly to 658 students, the highest enrollment level reported during the historical period.

However, enrollment data provided as part of the Renewal Appeal Petition presents notable inconsistencies. The school's FY 2025-26 census day enrollment reflects 420 students, representing a decline of 238 students, or 36%, from FY 2024-25. Despite this decline, the renewal appeal petition projects enrollment increasing to 525 students beginning in FY 2025-26 and remaining stable through FY 2027-28 and increasing modestly to 550 students beginning in FY 2028-29. The significant variance between actual FY 2025-26 enrollment and projected enrollment raises questions regarding the reasonableness of the enrollment assumptions, especially as 2025-26 has just concluded.

SCCOE Staff also reviewed grade-level enrollment trends for both EPCTC and its sister school, EPAFLC, as reflected in object 54 below. The data indicate that enrollment at both schools is disproportionately concentrated in Grade 9, with substantial declines in enrollment across Grades 10 through 12. In FY 2024-25, EPCTC reported 589 students in Grade 9 compared to only 35 students in Grade 10, 5 students in Grade 11, and 29 students in Grade 12. Similarly, EPAFLC reported 90 students in Grade 9, but only 12 students in Grade 10, 5 students in Grade 11, and 3 students in Grade 12. While some attrition may be attributable to student stability rate or students pursuing alternative educational pathways, the magnitude and consistency of the enrollment decline across upper grade levels raise concerns regarding student persistence, retention, and progression toward graduation. These trends may also have implications for the long-term sustainability of the school's instructional and financial models, as enrollment appears to rely heavily on continued recruitment of new students rather than progression of existing students through the full educational program.

Similarly, ADA has fluctuated significantly throughout the review period. Historically, ADA ranged from 399.45 in FY 2021-22 to 563.93 in FY 2022-23. The school's ADA percentage, calculated as ADA divided by enrollment, has varied substantially from year to year, ranging from 80% to 124%. While ADA rates between 80% and 96% are generally consistent with traditional attendance patterns, ADA percentage exceeding 100% are atypical and reflect the unique enrollment and attendance reporting characteristics associated with EPCTC's rolling enrollment model and adult education population.

According to EPCTC leadership, the variance in ADA percentages is primarily attributable to the school's continuous enrollment practices and the timing of enrollment reporting. Enrollment counts are generally based on annual CALPADS reporting snapshots, while students continue to enroll throughout the year. As a result, ADA generated later in the fiscal year may exceed the enrollment count reported during CALPADS certification period, resulting in ADA-to-enrollment ratios exceeding the original enrollment count used for comparative calculations.

Nevertheless, the SCCOE CSD Staff continue to have questions regarding enrollment and attendance practices. During discussions with EPCTC leadership, school representatives indicated that current enrollment was approximately 400 students as of May 2026, and that the revised FY2026-27 budget projections reflect this lower enrollment level. However, upon review of EPCTC second interim budget submitted recently still reflects 525 students.

Additionally, during SCCOE Staff's site visit, classroom observations in both the morning and evening instructional programs reflected substantially lower student counts, with several classrooms observed to have approximately two to fewer than twenty students present. While classroom observations represent only a snapshot in time and may not capture the full scope of the school's programming schedule, the observed attendance levels raised questions regarding

student participation patterns and the relationship between reported enrollment and actual classroom attendance.

During a fiscal review meeting on May 27, 2026, representatives from the school’s back-office provider indicated that enrollment and attendance information used for financial reporting is provided by EPCTC administration and is not independently verified by the provider. Consequently, SCCOE Staff continue to seek a clearer understanding of internal controls, monitoring procedures, and documentation supporting reported enrollment and ADA data.

Given the significant fluctuations in enrollment, discrepancies between actual and projected enrollment, unusually high ADA-to-enrollment ratios in certain years, low student stability rates, substantial declines in upper-grade enrollment, and questions arising from site observations, SCCOE Staff remain concerned about enrollment tracking, attendance accounting practices, and student persistence outcomes. These factors limit SCCOE Staff’s ability to fully evaluate the fiscal sustainability of the program and assess the effectiveness of the instructional model in supporting long- term student success.

Object 53: EPCTC Historical and Projected Enrollment and ADA1

	Historical Data								Enrollment Projection					
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
Grade 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Grade 4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Grade 5	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Grade 6	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Grade 7	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Grade 8	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Grade 9	512	492	292	337	458	447	589	304	464	464	464	489	489	489
Grade 10	57	51	45	38	24	33	35	55	31	31	31	31	31	31
Grade 11	11	10	24	14	19	2	5	34	4	4	4	4	4	4
Grade 12	63	37	53	26	27	33	29	27	26	26	26	26	26	26
A. Actual Enrollment	643	590	414	415	528	515	658	420						
B. Projected Enrollment									525	525	525	550	550	550
C. Incr/(Decr) in Enrollment ²	(54)	(53)	(176)	1	113	(13)	143	(238)	105	0	0	25	0	0
D. Enrollment Variance ³	-8%	-8%	-30%	0%	27%	-2%	28%	-36%	25%	0%	0%	5%	0%	0%
E. Incr/(Decr) in Enrollment Variance ⁴		0%	-22%	30%	27%	-30%	30%	-64%	61%	-25%	0%	5%	-5%	-5%
F. ADA	515.69	512.74	512.61	399.45	477.42	529.24	563.93	388.07	441.00	441.00	441.00	462.00	462.00	462.00
G. ADA % ⁵	80%	87%	124%	96%	90%	103%	86%	92%	84%	84%	84%	84%	84%	84%

¹ Historical enrollment data is based on Census Day enrollment and historical ADA is based on P2 ADA.
² Current Year FY 2025-26 ADA data is based on P-1. FY 2025-26 through FY 2030-31 is based on Petition Renewal Projections.
³ Current Year Enrollment minus Prior Year Enrollment
⁴ Row C/Prior Year Enrollment
⁵ Current Year Enrollment Variance - Prior Year Enrollment Variance (Row D)
⁶ Row F/Row A or Row B

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Object 54: EPAFLC and EPCTC Historical Enrollment by Grade Level

Enrollment by grade level												
AFL												
Grade	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
K	47	52	67	57	53	52	47	26	30	33	24	19
1	39	45	34	37	34	35	32	39	25	30	30	26
2	35	36	46	34	42	35	35	34	28	28	32	29
3	34	34	35	39	31	45	34	37	34	29	28	27
4	22	35	31	27	37	29	44	34	42	38	29	29
5	21	24	32	24	25	29	27	41	30	48	35	32
6	12	22	23	23	17	28	33	28	35	26	45	35
7	21	14	25	20	21	19	25	25	29	31	29	46
8	18	19	14	23	15	25	19	25	29	29	32	28
9	50	65	55	55	54	60	90	41	71	91	87	90
10	16	17	21	12	11	4	10	10	6	7	8	12
11	7	5	3	4	1	2	3	1	1	0	0	5
12	8	12	7	4	9	6	5	8	1	1	6	3
Total	330	380	393	359	350	369	404	349	361	391	396	396
CTC												
Grade	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
9	852	738	649	551	546	512	492	292	337	458	447	589
10	63	78	79	76	62	57	51	45	38	24	33	35
11	31	26	41	32	24	11	10	24	14	19	2	5
12	30	48	43	55	65	63	37	53	26	27	33	29
Total	976	890	812	714	697	643	590	414	415	528	515	658

Source EP Certificate of Annual filing Nov 26,2025

Revenues & Expenses

Object 55, below, presents EPCTC’s current year budget and multi-year financial projections for FY 2025-26 through FY 2030-31. The projections indicate that EPCTC expects to maintain overall fiscal solvency throughout the renewal term despite periods of deficit spending. Based on the Renewal Appeal Petition assumptions, total revenues are projected to range from approximately \$10.1 million to \$10.9 million annually, while expenditures are projected to range from approximately \$10.0 million to \$11.2 million.

EPCTC projects an operating deficit of **\$(639,614)** in FY 2025-26, followed by a modest surplus throughout the remainder of the projection period. Overall, the projected operating results are relatively balanced and do not indicate significant structural deficits. Furthermore, the school projects ending net assets to remain above \$15.8 million throughout the renewal term, with the reserve percentage ranging from 142% to 160% of total expenditures.

While the projected financial position appears fiscally sound, the reliability of the projections is dependent upon the reasonableness of the enrollment and ADA assumptions. The Renewal Appeal Petition projections are based on enrollment assumptions of 525 students beginning in

FY 2025-26 and continuing through FY 2027-28, increasing to 550 students beginning in FY 2028-29.

However, enrollment information provided by EPCTC through multiple reporting mechanisms reflects inconsistencies that warrant further review. Specifically, EPCTC reported 420 students on the FY 2025-26 Census Day reporting period. Recently, EPCTC’s FY 2025-26 Second Interim budget assumes enrollment of 525 students, while school representatives indicated during the fiscal meeting with CSD Staff that current enrollment is approximately 400 students. CSD Staff notes that the Second Interim budget should reflect updated enrollment information available. As a result, Staff is unable to fully reconcile the enrollment assumptions utilized across the Renewal Appeal Petition, Census Day reporting, and interim financial reporting.

These varying enrollment numbers create uncertainty regarding the assumptions used to develop both the Renewal Appeal Petition projections and current year budget. Given that Local Control Funding Formula (LCFF) revenues and other state funding sources are largely driven by enrollment and ADA, any overstatement of enrollment assumptions may result in overstated revenue projections and projected operating results.

Notwithstanding these concerns, EPCTC’s substantial reserve position provides a significant fiscal cushion against potential enrollment and revenue shortfalls. The SCCOE CSD Staff are not aware of any immediate fiscal solvency concerns. However, the inconsistencies in data reported by EPCTC impede SCCOE CSD Staff’s ability to fully evaluate the reasonableness of multi-year projections and the long-term sustainability of the financial plan presented in the Renewal Appeal Petition.

Object 55: EPCTC Renewal Appeal Petition Multi-Year Projection Summary

		2025-26*	2026-27	2027-28	2028-29	2029-30	2030-31
[A]	Total Revenues	10,525,128	10,133,798	10,132,721	10,632,681	10,927,566	10,927,700
[B]	Total Expenses	11,164,742	10,010,917	10,161,484	10,381,395	10,587,779	10,815,675
[C] = [A - B]	Net Income (Loss)	(639,614)	122,881	(28,763)	251,286	339,787	112,025
[D]	Beginning Fund Balance	16,516,453	15,876,839	15,999,719	15,970,956	16,222,242	16,562,029
[E]	Adj. to Beg. Fund Balance	-	-	-	-	-	-
[F] = [(D+E) + C]	Total Net Assets, End of Year	\$ 15,876,839	\$ 15,999,719	\$ 15,970,956	\$ 16,222,242	\$ 16,562,029	\$ 16,674,054
[G] = [F/B]	Reserve Percentage	142%	160%	157%	156%	156%	154%

1. Source of Data for *FY 2025-26 (Current Year), FY 2026-27 - FY 2030-31 (Multi-Year) EPCTC Renewal Petition projections.

EPCTC Renewal Appeal Petition projected revenues by category, with primary funding anticipated from state and federal sources. The Local Control Funding Formula (LCFF) remains the largest revenue source. EPCTC projects an average of 81% of total revenue from LCFF entitlement, 17% from other state funding, and approximately 2% from federal and other local revenue sources.

Object 56 & 57, below, compares EPCTC’s historical expenditure patterns for FY 2017-18 through FY 2024-25 with the average expenditure allocation projected in the Renewal Appeal Petition for FY 2025-26 through FY 2030-31.

Historically, EPCTC allocated approximately 60% of total expenditures towards salaries and benefits, consisting of 14% for certificated salaries, 28% for non-certificated salaries, and 18% for employee benefits. The remaining 40% of expenditures were allocated to services and operations (33%), books, supplies, and materials (2%), capital outlay (2%), and other outgo (2%)

Overall, the projected expenditure allocations are generally consistent with EPCTC's historical spending patterns and appear reasonable. The Renewal Appeal Petition reflects a modest shift toward increased investment in certificated staffing, with certificated salary expenditures increasing from the historical average of 14% to a projected average of 20% of total expenditures. At the same time, non-certificated salary expenditures are projected to decrease slightly from 28% historically to 26% during the projection period. Employee benefits remain relatively consistent with historical trends.

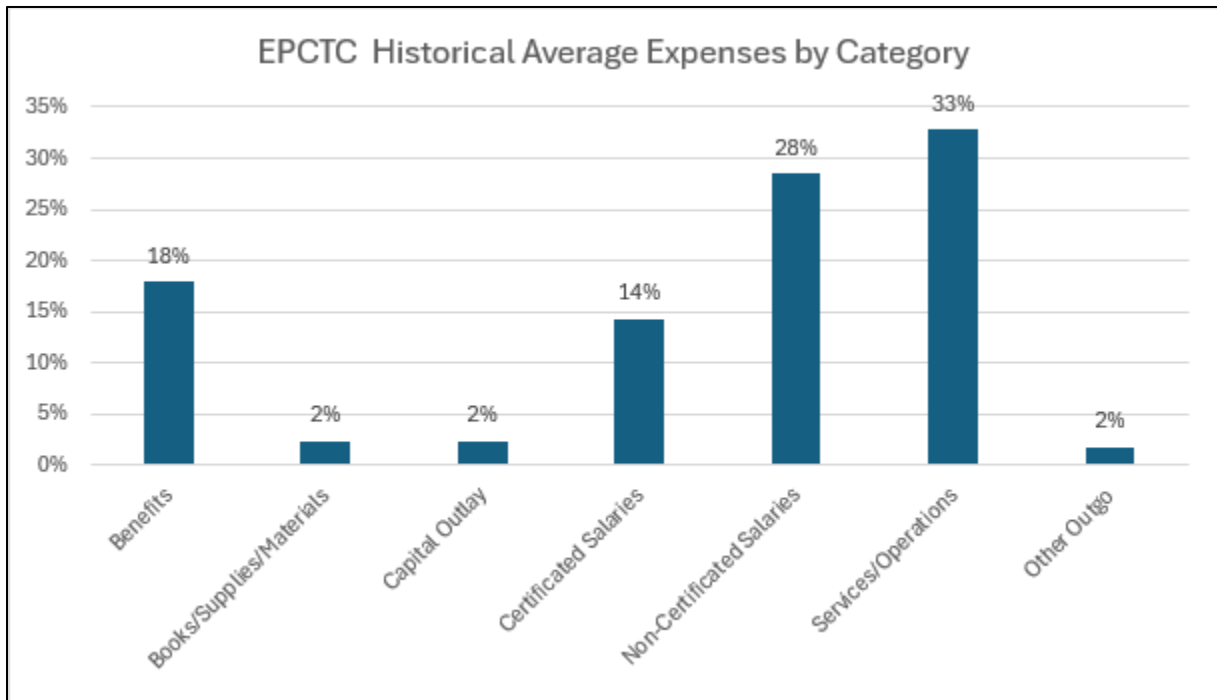
While the total personnel cost of approximately 65% of expenditures is generally consistent with education industry norms, CSD Staff notes that EPCTC's allocation toward certificated salaries remains significantly lower than that typically observed in many traditional California public schools and charter schools. Even under the projected expenditures model, certificated salaries are expected to represent only 20% of total expenditures, which remain below the levels commonly associated with classroom-based serving high-need students' instructional programs.

As discussed in the finances section above, CSD Staff recognize that EPCTC operates a unique educational model serving adult learners, which may require a different staffing structure in addition to shared staff with sister campus. However, CSD Staff remains concerned regarding the relatively low proportion of expenditures allocated to certificated instructional personnel compared to overall operating expenditures. These concerns are further compounded by information obtained during document review, fiscal discussions, and during the site visit, which indicate that personnel and instructional resources may be shared among EPCTC, EPAFLC, childcare programs, and other affiliated operations.

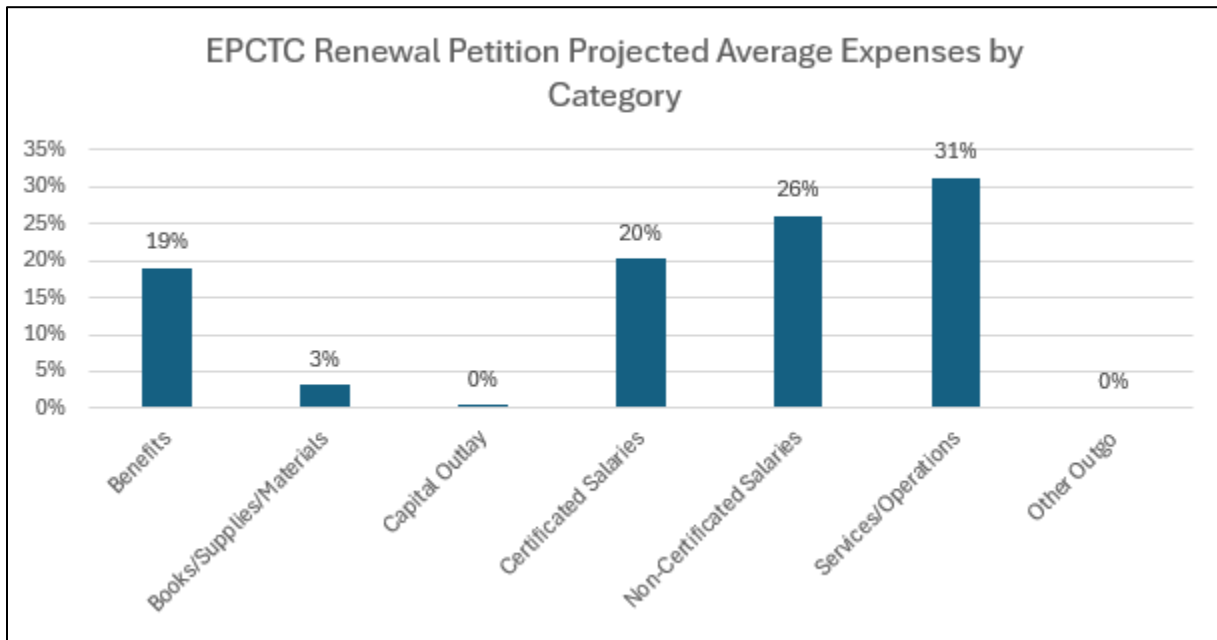
During the site visit, CSD Staff also observed instructional settings that appeared to include both youth and adult students. While CSD Staff recognize that shared facilities and coordinated services may be part of the organization's operational model, the available documentation does not clearly identify staffing assignments, employee time allocations, or the methodology used to allocate personnel costs among the various programs. These factors raise questions regarding instructional staffing levels, the extent to which certificated and non-certificated personnel are utilized to deliver instruction, the allocation of personnel costs among related programs, and whether staffing resources are sufficient to support the educational program described in the Renewal Appeal Petition.

Given the limited information available regarding staffing assignments, employee time allocation, and cost-sharing methodologies, SCCOE Staff is unable to fully evaluate the fiscal integrity of reported expenditures, the reasonableness of cost allocations between affiliated programs, and the extent to which staffing resources support the educational program and student outcomes.

Object 56: EPCTC Historical Average Expenses by Category



Object 57: EPCTC Renewal Appeal Petition Projected Average Expenses by Category



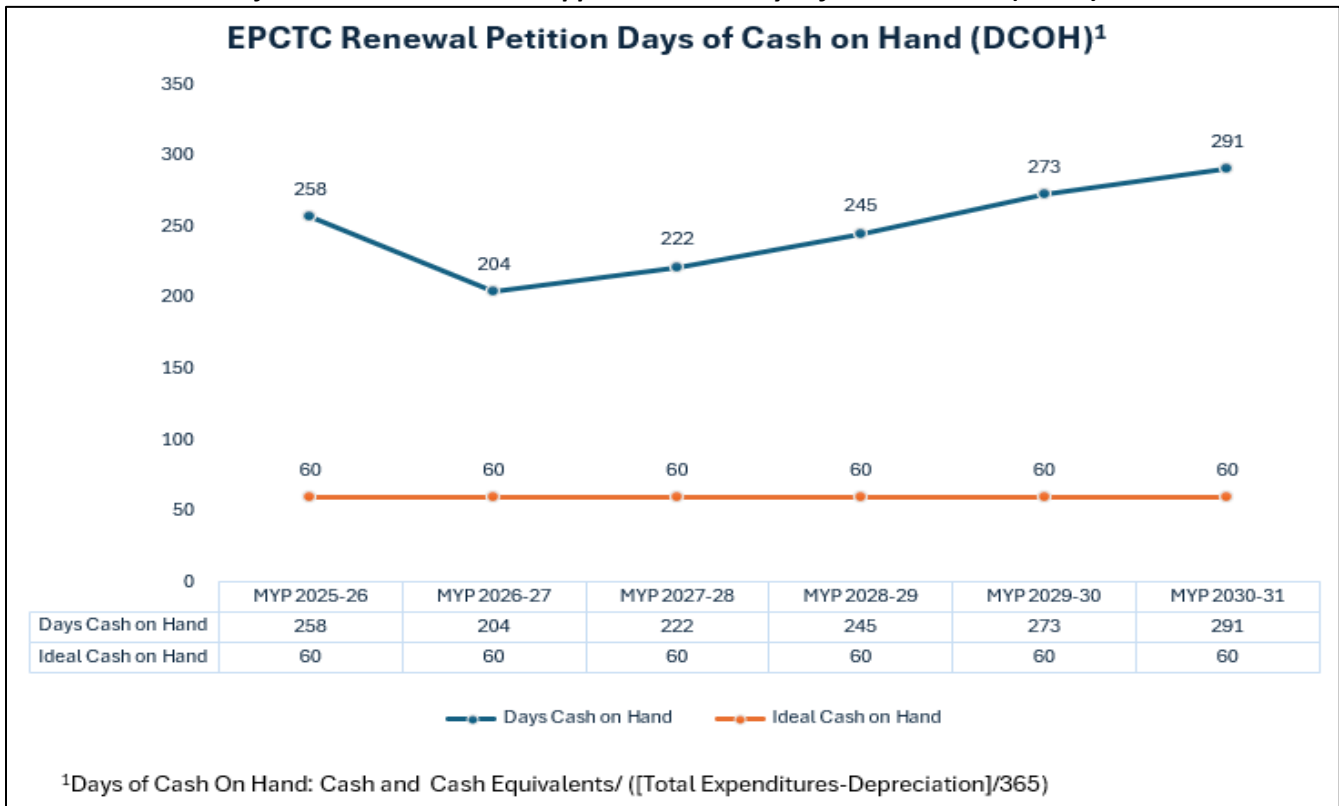
Cash Flow

The EPCTC Charter Renewal Appeal Petition includes cash flow projections for FY 2025-26 through FY 2030-31 and projects positive cash balances throughout the renewal term.

As reflected in Object 51, EPCTC’s projected Days Cash on Hand (DCOH) ranges from 204 days to 291 days, substantially meeting and exceeding the industry benchmark of 60 days. Historically, EPCTC has maintained a strong cash position with DCOH ranging from 223 to 609 days between FY 2017-18 and FY 2024-25. The projected balances indicate that the school should have sufficient liquidity to meet its ongoing financial obligations.

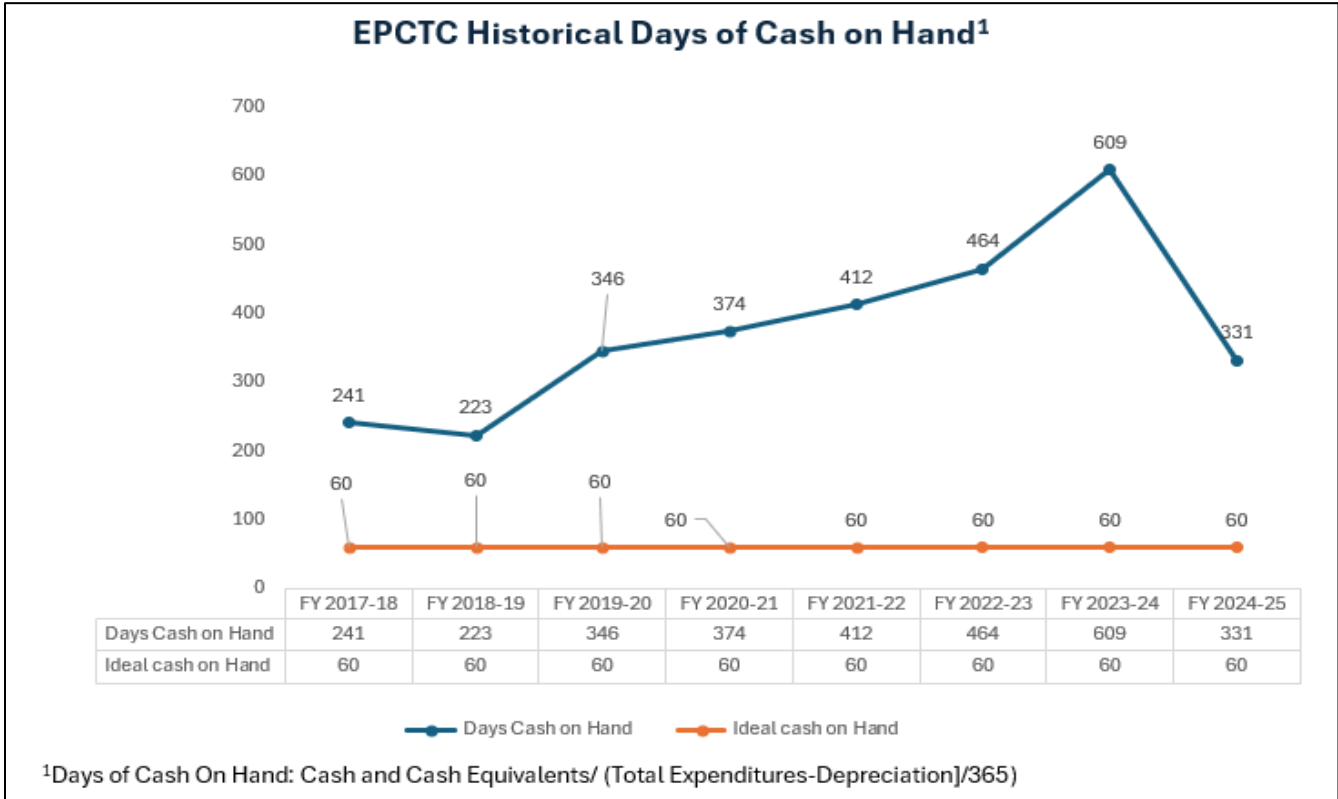
Staff notes, however, that the FY 2025-26 beginning cash balance reflected in the cash flow projection (\$8,575,832) does not reconcile to the FY 2024-25 audited ending cash balance (\$8,414,510). Additionally, the cash flow worksheet indicates that the monthly cash forecast was prepared as of October 2026, which appears inconsistent with the FY 2025-26 projection period. Staff concerns regarding the accuracy and reliability of the cash flow projections.

Object 58: EPCTC Renewal Appeal Petition Days of Cash on Hand (DCOH)¹



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Object 59: EPCTC Historical Days of Cash on Hand



Potential Civil Liability Effects on the School and County Office

EPCTC is operated by a nonprofit public benefit corporation and, as part of the SCCOE standards of excellence contained in the MOU, EPCTC has stated it will agree to SCCOE’s insurance, indemnification, defense, and hold harmless requirements, which assist in insulating SCCOE from civil liability effects from EPCTC’s operation.

However, Escuela Popular del Pueblo is in current litigation with ESUHSD, case number 26CV491676, as evidenced by EP’s closed session item on May 18, 2026. Upon review of the Santa Clara County Superior Court, it was determined that the case in question is regarding the revocation actions on April 2, 2026, by ESUHSD concerning EPCTC and EPAFLC. This case is set for trial on June 30, 2026.

Although ESUHSD took action to revoke both EPCTC and EPAFLC, both schools appealed to SCCBOE on April 20, 2026, regarding those decisions and SCCBOE will act on the revocation appeals on July 15, 2026. Given the revocation actions and the review of the EPCTC Renewal Appeal Petition, concerns remain regarding EPCTC credentialing, governance, instructional program, enrollment, attendance, and the other myriad issues which were raised by ESUHSD.

5. Exclusive Public Employer

As required by the Charter Schools Act, the Charter specifies EP shall be deemed the exclusive public employer of the employees of the Charter School for the purposes of Educational Employment Relations Act (“EERA”).

6. Requirements for Grade-Levels Served, Facility Location, and Students Served

EPCTC currently serves grades 9-12 and students who are 18 yrs or older and no longer qualify to attend EPAFLC. EPCTC is collocated within the boundaries of the ESUHSD in a facility leased from Alum Rock Union School District on a 40-year lease and enhanced using bond funds. The property has been adapted for EPAFLC and EPCTC’s specific needs, and EPCTC plans to remain at that location throughout the renewal term. EPCTC is located at 149 N. White Road, San Jose, CA.

The Charter Schools Department Staff found EPCTC can meet the requirements for grade levels served, facility location, and students served.

7. Any Other Criteria Set Forth in the Statute


Since EPCTC’s Charter was last renewed, several new laws have gone into effect, including but not limited to AB 1505, AB 1507, AB 1219, SB 126, SB 820, and SB 98, which enacted broad changes to the Charter Schools Act. EPCTC will need to comply with the changes to the law.

Further, as this renewal request is an appeal of a denial from ESUHSD, approval of the renewal would also cause a change in authorizers to SCCBOE.

The renewal appeal Petition also includes several sections in the “Miscellaneous” charter elements. These elements appear to be EPCTC’s attempt to embed ESUHSD’s MOU requirements into the EPCTC charter. However, EPCTC cannot bind the County to any elements it did not agree to.

Finally, CSD Staff reviewed the letters of support submitted as part of the Renewal Appeal Petition and identified one letter that appeared to have been electronically modified to include EPCTC. The modification is evidenced by a noticeable change in font that is visible within the document (see images below).

SPACE LEFT INTENTIONALLY BLANK



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9/25/25

Dear Honorable Eastside Union Board of Trustees and Superintendent Glenn Vander Zee,

I am writing this letter on behalf of Escuela Popular del Pueblo (Escuela Popular) to express my complete support for the charter renewal of Escuela Popular Accelerated Family Learning Center & Center for Training Careers.

For the past 15 years or so, I have been a part of the Escuela Popular community as a physician from Valley Medical Center's Valley Homeless Healthcare Program, providing supportive health services to EP students. While I/we are no longer providing services at EP, my support for the program remains strong.

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While this alteration does not, in itself, constitute a violation of the charter, it raises concerns regarding the accuracy and authenticity of documents submitted in support of the Renewal Appeal Petition and calls into question the integrity of the organization's petition submission process.

CONCLUSION

The Charter Schools Department Staff reviewed EPCTC's Renewal Appeal Petition and considered it against the standards for renewal of DASS schools, utilizing the criteria set forth in Education Code Sections 47605, 47607, and 47607.2.

Based upon its comprehensive review and analysis of the Renewal Appeal Petition, Staff finds that the Charter School presents an unsound educational program for the pupils to be enrolled in the Charter School, petitioners are demonstrably unlikely to successfully implement the program due to fiscal and capacity issues, and the petition does not contain reasonably comprehensive descriptions of all of the required elements of a charter petition, including but not limited to the Education Program, Measurable Student Outcomes, Governance, Health and Safety Procedures, Retirement System, Return Rights of Employees, and Closure Protocols. Further, Staff finds that EPCTC has not met its alternative metrics and that when compared to other DASS schools and comparable schools selected by EP in its 2025 Certificate of Annual Finding, closure is in the best interest of the students. Finally, Staff finds that there are substantial governance issues that are so pervasive and severe as to render a corrective action plan unviable. Accordingly, Staff recommends that the Board take action to deny this Renewal Appeal Petition by adoption of the proposed Resolution setting forth written factual findings and incorporating by reference the factual findings set forth above, specific to the Escuela Popular Center for Training and Careers Family Learning Renewal Appeal Petition supporting denial of the Charter.

CSD Staff further recommend that the SCCBOE effectuate these actions by adopting the proposed resolution entitled: Resolution Denying the Charter Renewal Appeal for Escuela Popular Center for Training and Careers Family Learning Charter School.

Student Impact

The Charter School Department provides oversight and monitoring for 20 County Board of Education authorized charter schools. EPCTC was originally authorized in 2004 by ESUHSD and currently serves approximately 420 students.