

**STAFF ANALYSIS, RECOMMENDATIONS, AND PROPOSED FINDINGS OF FACT REGARDING REVIEW OF
ROCKETSHIP ALMA ACADEMY CHARTER SCHOOL COUNTYWIDE RENEWAL PETITION AND REQUEST FOR
MATERIAL REVISIONS**

NOVEMBER 20, 2024, posted NOVEMBER 5, 2024

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Rocketship Alma Academy Charter School (RSA) seeks approval to renew its Santa Clara County independent, or direct funded, countywide benefit charter school serving students in grades TK-5. RSA was initially approved in November 2011, for a five-year term to serve grades K-5 and was renewed in 2017. Its’ governance structure was also materially revised in 2013 to bring all Rocketship schools under one governing board. RSA’s current term expires June 30, 2025, as its current term was extended by two years in 2021 and for an additional year in 2023 by operation of law. RSA has requested renewal for a term of five years from July 2025 through June 2030, due to its designation by the California Department of Education (CDE) as a school in the middle performing category. RSA, operating within the boundaries of Santa Clara County and located in the San Jose Unified School District (SJUSD), currently serves approximately 420 students.

PROCEDURAL STATUS

The Charter Schools Department (CSD) of the Santa Clara County Office of Education received a renewal charter petition (Renewal Petition or Charter), from RSA on September 3, 2024. RSA is operated and governed by Rocketship Education doing business as Rocketship Public Schools,¹ a nonprofit public benefit corporation. *Education Code (EC)* Sections 47607 and 47607.2 determine the length of charter renewal based on a charter school’s placement in the high, middle, or low performance categories established by AB 1505. Pursuant to criterion in *EC* Sections 47607(c) and 47607.2(a), RSA is in the middle performing category, and the school qualifies for a five-year renewal term (see further analysis below). If the charter is renewed by the Santa Clara County Board of Education (SCCOE or County Board of Education²), the new term of the Charter would begin on July 1, 2025, and run through and including June 30, 2030. Renewals and material revisions of countywide charters are governed by the standards and criteria set forth in *EC* Sections 47605.6, 47607 and 47607.2.

As noted, RSA is operated by RPS as part of the RPS network of charter schools. This network includes Rocketship Sí Se Puede Academy Charter School (RSSP) and Rocketship Brilliant Minds Academy (RBM), both of which are also up for renewal as SCCBOE-authorized middle performing charter schools on the same cycle, with the renewal term for each proposed to be July 1, 2025 – June 30, 2030. The SCCBOE is scheduled to act on the RSSP renewal on November 6, 2024, while the RBS action is scheduled to be at the same meeting as the action on RSA, which is November 20, 2024. It is significant, however, that RSA and RBM are both countywide charters authorized and

¹ Throughout this document, Rocketship Education doing business as Rocketship Public Schools may be referred to for purposes of convenience as “RPS,” “RSED,” “CMO,” or “Network,” but the Rocketship Alma Academy charter school, Rocketship Public Schools and Rocketship Education may be referred to collectively, separately, or interchangeably as “RSA” 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.”

requesting renewal in accordance with *EC* Section 47605.6, while RSSP is a district appeal charter that was approved by the SCCBOE on appeal of a denial by Alum Rock Union School District. The SCCBOE has substantial discretion in considering a countywide charter school, including the authority to deny a countywide charter on “[a]ny other basis [beyond those specified in statute] that the county board of education finds justifies the denial” and the authority to “impose any additional requirements beyond those required by [*EC* Section 47605.6] that it considers necessary for the sound operation of a countywide charter school.” (*EC* Section 47605.6.) Additionally, the denial of a renewal of a countywide charter school may not be appealed to the State Board of Education. (*EC* Section 47607.5.)

Unsurprisingly, given that all three schools are part of the same charter school network, while the RSA, RBM, and RSSP renewal charter petitions each contain information and data that is specific to the particular school, the general terms of each petition are virtually identical, so Staff’s analysis, recommendations, and recommended findings are also quite similar. However, in the case of RSA and RBM, Staff recommends that the County Board address concerns through requirements that it considers necessary to the sound operation of the schools as countywide charter schools, as explicitly provided for in Education Code Section 47605.6. Prior to the publication of this Staff Analysis, RPS submitted a response to the staff analysis and proposed findings of fact for the RSSP renewal, in which RPS generally expressed cooperation regarding Staff’s recommendations and recommended findings and conditions of renewal for RSSP. CSD Staff believes that RPS’s position would be the same relative to similar concerns in the analysis of RSA’s Renewal Petition as RPS’s expressed position regarding the RSSP analysis, so this Staff Analysis addresses some of those responses as pertinent to this Staff Analysis.

On October 2, 2024, the SCCBOE held a public hearing on the RSA Renewal Petition in accordance with the requirement to do so within 60 days of receipt of the Renewal Petition. On October 8, 2024, SCCOE Staff conducted a renewal site visit and held renewal interviews with RSA parents, students, staff, board members and representatives of RPS leadership as the charter management organization or network.

Pursuant to *EC* Sections 47607, 47607.2 and 47605.6, the County Board of Education has 90 days from receipt of the Renewal Petition to act, which may be extended by an additional 30 days by mutual agreement. SCCBOE will hold the decision hearing November 20, 2024, to act on the RSA request for renewal and request for material revisions.

In accordance with Board Policy 0420.4, SCCOE, RSA, and RSED/RPS developed a Memorandum of Understanding in 2017 (2017 MOU). By its terms, this 2017 MOU “shall continue in full force and effect during the period of any renewal granted by the SCCBOE or during the pendency of an appeal of a denial of a renewal request unless and until such time as the Parties enter into a replacement MOU or specifically agree in writing that the MOU is terminated.” The 2017 MOU governs the respective fiscal, operational, administrative responsibilities, legal relationships, and other matters not otherwise fully addressed or resolved by the terms of the current charter or the Renewal Petition, pending any further direction or recommendations by the SCCBOE, including SCCBOE’s adoption of the SCCOE’s recommendations and recommended findings. By its terms, the 2017 MOU is incorporated into the Renewal Petition by reference, therefore, its terms supplement the Renewal Petition submitted by RSA and were considered as part of SCCOE’s analysis of the Renewal Petition and informed this analysis, including the assessment of whether the Renewal Petition includes reasonably comprehensive descriptions of each of the required charter elements, whether or not any specific provision of the 2017 MOU is referenced in this analysis, and it continues to bind the Parties unless and until revised or replaced by mutual agreement of the Parties, and if the Parties enter into a new MOU and/or addendum, as recommended herein, provisions from the 2017 MOU may need to be incorporated therein or the 2017 MOU remain in effect.

SCCOE has provided RSA an updated memorandum of understanding (2024 MOU) that is consistent with changes to law since entering into the 2017 MOU and reflects SCCOE’s current best practices. RSA has expressed its intent

to enter into an updated memorandum of understanding and has met with SCCOE to discuss the terms of the 2024 MOU. RSA may sign the updated 2024 MOU prior to SCCBOE action on the Renewal Petition, but if the 2024 MOU is not signed by RSA prior to SCCBOE action, SCCOE will continue to work with RSA on finalizing the updated 2024 MOU or an addendum to the current 2017 MOU as necessary to reflect current law and best practices and recommends that this be a requirement of any renewal of RSA's Charter necessary to its sound operation as a countywide charter school.

The complete Renewal Petition on which the SCCBOE is acting is attached to the agenda item in BoardDocs and is also available for review at the following location: https://www.sccoe.org/supoffice/charter-schools-office/Pending/Rocketship_Alma_Renewal_Petition.pdf

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. Pursuant to *EC* Section 47607(b) this countywide charter renewal is "governed by the standards and criteria" described in Section 47605.6, 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 47605.6, a 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 school employer of the employees of the charter school for purposes of the Educational Employment Relations Act (EERA).
6. Or any other basis the County Board determines justifies denial.

Additionally, as noted above, the County Board may "impose any additional requirements beyond those required by [EC Section 47605.6] that it considers necessary for the sound operation of a countywide charter school."

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.)

The CDE annually creates a list of all charter schools and ranks their academic performance indicators from the California School Dashboard, specifying whether each school is in the high, middle, or low performing category, or is a DASS program school. This list was intended to relieve the burden on chartering authorities and provide a starting place for the renewal process. The CDE has designated RSA as a "middle" performing charter school for purposes of this renewal request on the CDE's list issued in March 2024, and its middle performance status was reaffirmed on the CDE's updated list issued in October 2024.

As defined in *EC* Section 47607.2, "middle" performing charter schools are any charter school not deemed as "high" or "low" performing and are eligible to be considered for a five-year renewal term.

In determining whether to renew a middle performing charter, the chartering authority is to consider the following:

- i. *The schoolwide and subgroup performance on the state and local indicators on the Dashboard, giving greater weight to measurements of academic performance.*
- ii. *Clear and convincing evidence based on verified data showing either:*
 - a) *The school achieved measurable increases in academic achievement, defined by at least one year of growth for each year of school, OR*
 - b) *Strong post-secondary outcomes, as defined by college enrollment, persistence, and completion rates equal to similar peers.*

As a TK-5 school, the post-secondary outcomes standard is not applicable to RSA.

The chartering authority may deny a “middle” performing school on these bases only by making written factual findings, setting forth specific facts to support the findings, that the school:

- i. *Failed to meet or make sufficient progress toward meeting standards that provide a benefit to the pupils of the school;*
- ii. *Closure of the school is in the best interest of pupils; AND*
- iii. *If applicable, that the decision provided greater weight to performance on measurements of academic performance.*

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 is not serving all pupils who wish to attend.*

In such cases, the chartering authority must provide the charter school 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, or*
- b. *The violations are sufficiently severe and pervasive as to render a corrective action plan unviable.*

DETERMINATION CRITERIA FOR RENEWAL OF RSA

As stated above, CDE has designated RSA as a school in the middle performance category for purposes of this renewal. In its Renewal Petition, RSA 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 middle-performing charter schools, RSA submitted its data from the California Assessment of Student Performance and Progress (“CAASPP”) as well as comparison data for the local district and local district schools RSA students would otherwise have attended. RSA states the data submitted on pages 11 through 28 of the Renewal Petition establishes RSA as a school in the middle performing category, meeting the criteria for charter renewal. Staff has not reproduced all the information provided by RSA in this Staff Analysis and Proposed Findings of Fact but incorporates it and the CAASPP data herein by this reference.

RSA was asked to submit additional data and information in response to questions that arose during the October 2, 2024, public hearing on the renewal Charter. At the time of publication, RSA had not yet submitted the data requested.

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

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. 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 lowest and Blue being 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.”

Object 1: California Dashboard Performance Color Chart



There was no data in 2019-20 or 2020-21 due to the cancelation of statewide testing as a result of COVID-19. The 2022 Dashboard (based on 2021-22 data) did not have any prior year data for comparison and, therefore, only included Status levels, which was represented by purple “cell phone bars.” No Change was included. The 2023 Dashboard (based on 2022-23 data) had prior year data for comparison. Thus, Change was reinstated. The following data is based on 2022 and 2023 Dashboard data which shows the performance level colors, or the Status from 2022-23, and the Change, or the difference (growth or decline), from 2021-22.

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Object 2: RSA Performance on 2023 California School Dashboard

2023 CALIFORNIA SCHOOL DASHBOARD										
	ELA		Math		ELPI		Chronic Absenteeism		Suspension	
	DFS	Level	DFS	Level	Rate	Level	Rate	Level	Rate	Level
All Students	-14.5	ORANGE	-17.8	YELLOW	31%	RED	15.2%	YELLOW	0%	BLUE
Hispanic/Latino	-22.6	ORANGE	-58.3	ORANGE			34.5%	YELLOW	0%	BLUE
English Learners (EL)	-23.8	ORANGE	-64.2	ORANGE			32%	YELLOW	0%	BLUE
Students with Disabilities (SWD)	-82.8	RED	-135.5	NPC			43.9%	ORANGE	0%	BLUE
Socioeconomically Disadvantaged (SED)	-15.3	ORANGE	-57.8	ORANGE			36%	YELLOW	0%	BLUE

In 2022-23, RSA received a Distance from Standard (DFS) score of -14.5 in ELA and declined -15.3 points from the prior year, making the performance level for all students Orange. RSA received a DFS score of -17.8 in Math and declined -5.5 points from the prior year, making the performance level for all students Yellow. RSA also declined 20.2 percentage points from the prior year and received Red on the English Learner Progress Indicator (ELPI).

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Object 3: 2022 and 2023 California School Dashboard Student Group Report for RSA

	Suspension Rate		Chronic Absenteeism		English Language Arts		Mathematics		English Learner Progress	
	2022	2023	2022	2023	2022	2023	2022	2023	2022	2023
All	VERY LOW 0%	BLUE 0%	VERY HIGH 37.7%	YELLOW 15.2%	MEDIUM 0.8 DFS	ORANGE -14.5 DFS	MEDIUM -12.3 DFS	YELLOW -17.8 DFS	MEDIUM 51.2%	RED 31%
EL	VERY LOW 0%	BLUE 0%	VERY HIGH 34.3%	YELLOW 15.5%	LOW -21.2 DFS	ORANGE -23.8 DFS	LOW -27.6 DFS	GREEN -22.3 DFS		
SED	VERY LOW 0%	BLUE 0%	VERY HIGH 35.4%	YELLOW 14.8%	LOW -5.9 DFS	ORANGE -15.3 DFS	MEDIUM -15 DFS	YELLOW -17.1 DFS		
SWD	VERY LOW 0%	BLUE 0%	VERY HIGH 39.4%	YELLOW 15.2%	VERY LOW -76.3 DFS	RED -82.8 DFS	NPL -85.2 DFS	NPC -100.1 DFS		
Asian	NPL 0%	NPC 0%	NPL 17.6%	NPC 7.1%	NPL	NPC	NPL	NPC		
Hispanic/Latino	VERY LOW 0%	BLUE 0%	VERY HIGH 39.6%	YELLOW 15.6%	LOW -8.4 DFS	ORANGE -22.6 DFS	MEDIUM -24.2 DFS	ORANGE -26.6 DFS		
White	NPL 0%	NPC 0%	NPL 30.8%	NPC 36.4%	NPL	NPC	NPL	NPC		
African American	VERY LOW 0%	BLUE 0%	VERY HIGH 28.9%	GREEN 7.5%	NPL 11.4 DFS	NPC 0.5 DFS	NPL 6.7 DFS	NPC -5.8 DFS		
Filipino	NPL	NPC	NPL	NPC	NPL	NPC	NPL	NPC		
American Indian		NPC		NPC						
Two or More Races	NPL	NPC	NPL	NPC						
Pacific Islander	NPL		NPL		NPL		NPL			
Foster	NPL		NPL							
Homeless	NPL	NPC 0%	NPL	NPC 13.3%	NPL		NPL			

*No performance level (NPL) given for groups of less than 30 students. Status rates are not given for groups of less than 11 students.

**No performance color (NPC) given for groups of less than 30 students.

Many areas of the RSA Dashboard have no performance color (“NPC”), or no performance level (“NPL”) due to the small size of the student group tested. Object 3 above shows RSA’s status for both the 2022 and 2023 Dashboard indicators for all students and all numerically significant student groups.

Object 4 below shows the Status and Change information from the 2022 and 2023 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 and chronic absenteeism rate indicators is the desired outcomes are low suspension and low chronic absenteeism rates, which means a low percent in the current year and a decline from the prior year rate. At RSA, both suspension and chronic absenteeism rates maintained or decreased for all students and for almost all numerically significant student groups, only White increased in chronic absenteeism.

Object 4: 2023 California School Dashboard Student Status and Change Report for RSA

	Suspension Rate	Chronic Absenteeism	English Language Arts	Mathematics	English Learner Progress
All	Maintained 0%	Declined 22.4%	Declined 15.3 points	Declined 5.5 points	Declined 20.2%
EL	Maintained 0%	Declined 19.8%	Declined 2.5 points	Increased 5.3 points	
SED	Maintained 0%	Declined 20.6%	Declined 9.4 points	Declined 2.1 points	
SWD	Maintained 0%	Declined 24.2%	Declined 6.5 points	NPC Declined 15 points	
Asian	NPC Maintained 0%	NPC Declined 10.5%	NPC	NPC	
Hispanic/ Latino	Maintained 0%	Declined 24%	Declined 14.3 points	Declined 2.4 points	
White	NPC Maintained 0%	NPC Increased 5.6%	NPC	NPC	
African American			NPC Declined 7.8 points	NPC Declined 1.2 points	
Homeless	NPC Maintained 0%	NPC	NPC	NPC	

**No performance color (NPC) given for groups of less than 30 students. Status rates are not given for groups of less than 11 students. Suspension Rate and Chronic Absenteeism are reverse metrics, therefore increasing in score is not desired.*

Objects 5 and 6, below, show data comparing the Dashboard indicators for all students and by student group for RSA and the State in 2021-22 and 2022-23. On the 2021-22 Dashboard, RSA outperforms the State in both ELA and Math for all students and all numerically significant student groups. RSA did not outperform the State on the ELPI but was only 0.5% from matching the State. On the 2022-23 Dashboard, RSA outperforms the State in in ELA for all the numerically significant student groups, but not for All students. In Math, RSA outperforms the State in Math for All students and all numerically significant student groups. RSA declined in its ELPI performance and did not outperform the State on that measure. Notably, RSA students outperform the State in multiple areas on both the 2021 and 2022 dashboards in both ELA and Math, causing RSA to be in the middle performance category.

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Object 5: 2022 California School Dashboard Student Group Data for RSA and the State

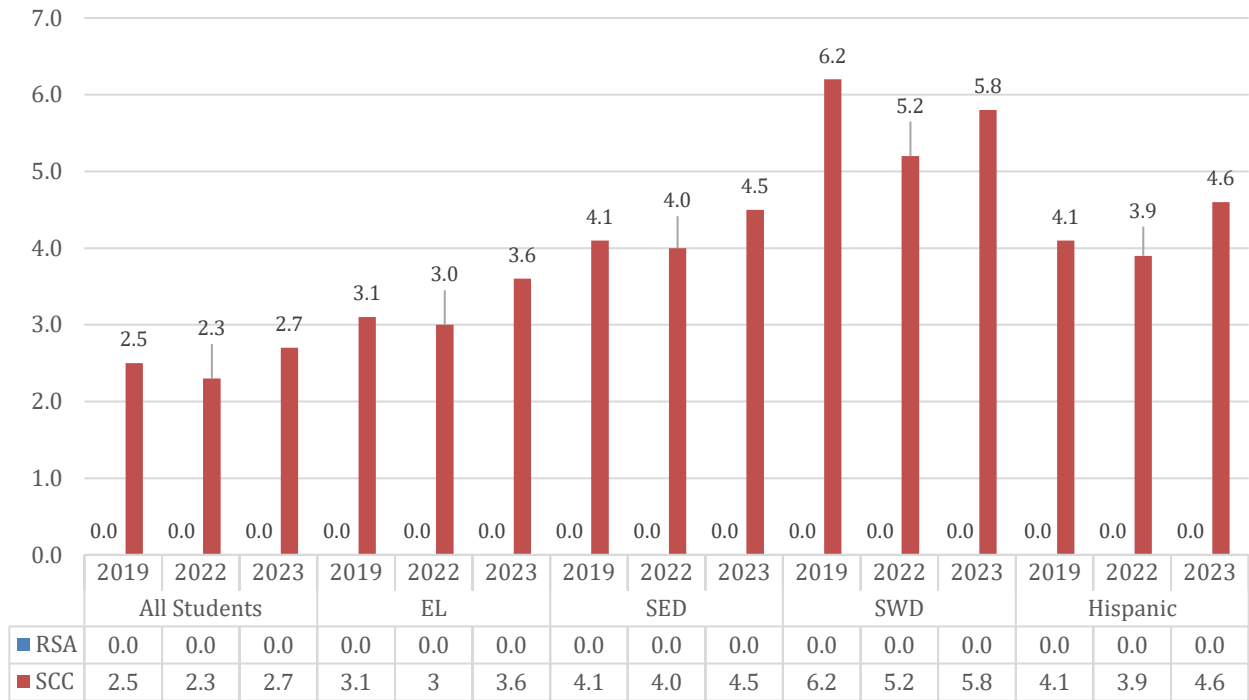
	Suspension Rate		Chronic Absenteeism		English Language Arts		Mathematics		English Learner Progress	
	RSA	State	RSA	State	RSA	State	RSA	State	RSA	State
All	VERY LOW 0%	MEDIUM 3.1%	VERY HIGH 37.7%	VERY HIGH 30%	MEDIUM 0.8 DFS	LOW -12.2 DFS	MEDIUM -12.3 DFS	LOW -51.7 DFS	MEDIUM 51.2%	MEDIUM 51.7%
EL	VERY LOW 0%	MEDIUM 3.2%	VERY HIGH 34.3%	VERY HIGH 33.6%	LOW -21.2 DFS	LOW -61.2 DFS	LOW -27.6 DFS	LOW -92 DFS		
SED	VERY LOW 0%	MEDIUM 4%	VERY HIGH 35.4%	VERY HIGH 37.4%	LOW -5.9 DFS	LOW -41.4 DFS	MEDIUM -15 DFS	LOW -84 DFS		
SWD	VERY LOW 0%	HIGH 5.4%	VERY HIGH 39.4%	VERY HIGH 39.6%	VERY LOW -76.3 DFS	VERY LOW -97.3 DFS	NPL -85.2 DFS	VERY LOW -130 DFS		
Hispanic/ Latino	VERY LOW 0%	MEDIUM 3.3%	VERY HIGH 28.9%	VERY HIGH 35.8%	LOW -8.4 DFS	LOW -38.6 DFS	MEDIUM -24.2 DFS	LOW -83.4 DFS		

Object 6: 2023 California School Dashboard Student Group Data for RSA and the State

	Suspension Rate		Chronic Absenteeism		English Language Arts		Mathematics		English Learner Progress	
	RSA	State	RSA	State	RSA	State	RSA	State	RSA	State
All	BLUE 0%	ORANGE 3.5%	YELLOW 15.2%	YELLOW 24.3%	ORANGE -14.5 DFS	ORANGE -13.6 DFS	YELLOW -17.8 DFS	ORANGE -49.1 DFS	RED 31%	YELLOW 48.7%
EL	BLUE 0%	ORANGE 3.7%	YELLOW 15.5%	YELLOW 26.3%	ORANGE -23.8 DFS	ORANGE -67.7 DFS	GREEN -22.3 DFS	ORANGE -93.4 DFS		
SED	BLUE 0%	ORANGE 4.5%	YELLOW 14.8%	YELLOW 29.9%	ORANGE -15.3 DFS	ORANGE -42.6 DFS	YELLOW -17.1 DFS	YELLOW -80.8 DFS		
SWD	BLUE 0%	ORANGE 5.9%	YELLOW 15.2%	YELLOW 33.1%	RED -82.8 DFS	RED -96.3 DFS	NPC -100.1 DFS	ORANGE -127.3 DFS		
Hispanic / Latino	BLUE 0%	ORANGE 3.8%	YELLOW 15.6%	YELLOW 28.4%	ORANGE -22.6 DFS	ORANGE -40.2 DFS	ORANGE -26.6 DFS	ORANGE -80.8 DFS		

Object 7, below, shows data comparing the suspension rate indicator by student group for RSA and Santa Clara County (SCC) in 2018-19, 2021-22, and 2022-23. 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. As noted above, a distinguishing feature of the suspension measure is the desired outcome is a low suspension rate, which means a low percentage in the current year and a decline from the prior year rate. While SCC showed mixed results for all students and for each student group year over year, RSA maintained 0% suspensions for all students and each targeted student group from 2018-19 to 2022-23.

Object 7: Comparison of RSA and SCC Suspension Rate



Object 8, below, displays Dashboard data comparing the chronic absenteeism rate indicator by student group for RSA and SCC in 2018-19, 2021-22, and 2022-23. In 2018-19, RSA’s chronic absenteeism rate was comparable to SCC for All Students and numerically significant student groups. After COVID, RSA’s chronic absenteeism rate increased significantly for All Students and across all numerically significant student groups, outpacing SCC for 2021-22 for All Students and all numerically significant student populations. For 2022-23, the chronic absenteeism rate at RSA declined for All Students and across all numerically significant groups, bringing it back in line with its pre-COVID rates, thereby outperforming SCC.

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Object 8: Comparison of RSA and SCC Chronic Absenteeism Rate



Data retrieved from: www6.cde.ca.gov/californiamodel/

CAASPP Data

The tables below reflect the CAASPP data (<https://caaspp-elpac.cde.ca.gov/>) verified by SCCOE staff while determining RSA’s schoolwide student performance and progress relative to the State, Santa Clara County (SCC), and schools with the largest student populations enrolled at RSA. Due to COVID-19, all statewide testing for 2019-20 was cancelled. Further, RSA submitted its Renewal Petition at the end of the 2023-24 school year, prior to the testing results for 2023-24 being available, however, on October 10, 2024, the State of California released the 2023-24 CAASPP data. The tables below constitute the most recent academic data available for review.

Object 9: Percentage of ALL STUDENTS at or Above Standard on CAASPP in ELA and Math at RSA, SCC, and Statewide for 2022-23

2022-23 CAASPP (ELA)			
Grade	RSA	SCC	State
3	24.71	54.96	42.96
4	47.37	56.82	43.73
5	63.16	60.36	46.69
All	42.66	59.48	46.66

2022-23 CAASPP (Math)			
Grade	RSA	SCC	State
3	45.24	58.40	45.11
4	44.74	56.62	40.79
5	44.64	50.57	33.38
All	44.91	51.42	34.62

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

Object 9a: Percentage of ALL STUDENTS At or Above Standard on CAASPP in ELA and Math at RSA, SCC, and Statewide for 2023-24

2023-24 CAASPP (ELA)			
Grade	RSA	SCC	State
3	31.94	53.69	42.80
4	30.77	55.72	43.90
5	50.77	59.55	47.37
All	37.21	59.17	47.04

2023-24 CAASPP (Math)			
Grade	RSA	SCC	State
3	31.51	58.79	45.63
4	43.02	56.25	41.20
5	39.39	51.08	35.02
All	38.22	52.09	35.54

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

Objects 9 and 9a, above, reflect the 2022-23 and 2023-24 CAASPP results in English Language Arts (ELA) and Math for RSA, SCC, and the State. In ELA, RSA is outperformed overall by both SCC and the State. In Math, RSA outperforms the State but is outperformed by SCC.

Object 10: Four-Year Trend of the Percentage for ALL STUDENTS at or Above Standard on CAASPP ELA and Math at RSA, SCC, and Statewide

Four-Year Trend CAASPP (ELA)				
	20-21	21-22	22-23	23-24
RSA	NA	56.68	42.66	37.21
SCC	68.67	60.63	59.48	59.17
State	49.01	47.06	46.66	47.04

Four-Year Trend CAASPP (Math)				
	20-21	21-22	22-23	23-24
RSA	NA	44.19	44.91	38.22
SCC	61.10	51.39	51.42	52.10
State	33.76	33.38	34.62	35.54

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

* RSA did not administer the CAASPP in 2020-21, in accordance with the flexibility granted by the CDE during that school year.

Object 10, above, reflects schoolwide student achievement in ELA and Math across the last four years of CAASPP for RSA, SCC, and the State. In ELA, RSA outperforms the State in 2021-22, declines in 2022-23, and declines again in 2023-24, resulting in the State outperforming RSA. For all three years, Santa Clara County outperforms RSA on the ELA CAASPP. In Math, RSA outperforms the State in all three years, but is outperformed by Santa Clara County. It should be noted that State and SCC scores include grades 6, 7, 8, and 11, negating one-to-one comparisons.

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Object 11: Four-Year Trend of the Percentage of Numerically Significant Student Groups at or Above Standard on CAASPP in ELA and Math for RSA Grades 3-5

ELA				
	20-21	21-22	22-23	23-24
ALL	NA	56.68	42.66	37.21
SWD	NA	40.91	20.00	20.00
Hispanic/Latino	NA	53.01	39.46	35.20
SED	NA	54.65	42.54	33.13
EL	NA	40.34	25.86	20.83

Math				
	20-21	21-22	22-23	23-24
ALL	NA	44.19	44.91	38.22
SWD	NA	28.57	20.83	12.90
Hispanic/Latino	NA	39.01	40.98	34.21
SED	NA	42.11	44.69	32.35
EL	NA	30.25	32.17	24.22

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

* RSA did not administer the CAASPP in 2020-21, in accordance with the flexibility granted by the CDE during that school year.

Object 11, above, reflects the CAASPP results for numerically significant student groups at RSA over the last four years. RSA did not administer the CAASPP in 2020-21, under flexibility granted by CDE due to COVID. In ELA, the data shows a decrease in the percentages of All Students and all numerically significant student groups performing at or above standard over the three years post-COVID. In Math, from 2021-22 to 2022-23, the data shows an increase in the percentage of students at or above standard for all numerically significant student groups except SWD. From 2022-23 to 2023-24, however, the percentage of student at or standard declines for All Students and all numerically significant student groups.

Object 12: Comparison of the Percentage of Students at or Above Standard on 2023 CAASPP ELA Results for RSA, SCC, and Comparison Schools Near RSA

2022-23 CAASPP (ELA)						
Group	RSA	SCC	Galarza	Shirakawa	Washington	State
ALL	42.66	59.48	19.33	46.60	20.11	46.66
SED	42.54	35.65	18.18	38.78	20.99	35.27
Hispanic/Latino	39.46	65.56	15.70	31.60	20.11	36.08
EL	25.86	29.20	4.69	15.60	11.48	10.87
SWD	20.00	20.50	4.76	14.58	6.06	15.75

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

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Object 12a: Comparison of the Percentage of Students At or Above Standard on 2024 CAASPP ELA Results for RSA, SCC, and Schools Near RSA

2023-24 CAASPP (ELA)						
Group	RSA	SCC	Galarza	Shirakawa	Washington	State
ALL	37.21	59.17	16.22	46.07	16.98	47.04
SED	33.13	37.87	14.52	40.80	17.91	36.81
Hispanic/ Latino	35.20	32.42	15.75	31.53	17.42	36.78
EL	20.83	12.80	12.07	12.03	8.33	10.29
SWD	20.00	19.35	9.52	10.64	9.68	15.83

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

Object 13: Comparison of the Percentage of Students At or Above Standard on 2023 CAASPP Math Results for RSA, SCC, and Comparison Schools Near RSA

2022-23 CAASPP (Math)						
Group	RSA	SCC	Galarza	Shirakawa	Washington	State
ALL	44.91	51.42	7.64	36.02	22.91	34.62
SED	44.69	25.47	6.35	28.96	24.07	22.91
Hispanic/ Latino	40.98	41.56	3.15	20.00	22.41	22.69
EL	32.17	30.58	0.00	11.59	17.21	9.93
SWD	20.83	18.24	4.76	10.42	6.06	12.26

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

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Object 13a: Comparison of the Percentage of Students At or Above Standard on 2024 CAASPP Math Results for RSA, SCC, and Schools Near RSA

2023-24 CAASPP (Math)						
Group	RSA	SCC	Galarza	Shirakawa	Washington	State
ALL	38.22	52.10	11.46	36.52	14.29	35.54
SED	32.35	28.73	11.11	29.80	15.94	24.97
Hispanic/ Latino	34.21	15.43	10.37	19.44	14.63	23.73
EL	24.22	21.34	9.09	13.01	10.26	10.25
SWD	12.90	17.68	0.00	12.24	0.00	12.54

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

Objects 12, 12a, 13, and 13a above, reflect the 2022-23 and the 2023-24 CAASPP data as compared to the State, SCC, and the schools RSA students would otherwise have attended or schools in close physical proximity to RSA: Galarza, Shirakawa, and Washington Elementary. Overall, SCC’s ELA scores outperform both RSA and the comparison schools in 2022-23 and 2023-24 for most numerically significant student groups. SCC and Shirakawa outperform RSA in ELA in both years for All Students and in 2022-23 for students who are SED. RSA outperforms all comparison schools, the State and SCC in ELA for students who are Hispanic/Latino in 2023-24. In Math, All Students in SCC outperform All Students at RSA, but RSA outperforms SCC and all comparison schools for students who are SED, Hispanic/Latino, ELs, or SWD in both 2022-23 and 2023-24.

ELPI/ELPAC Data

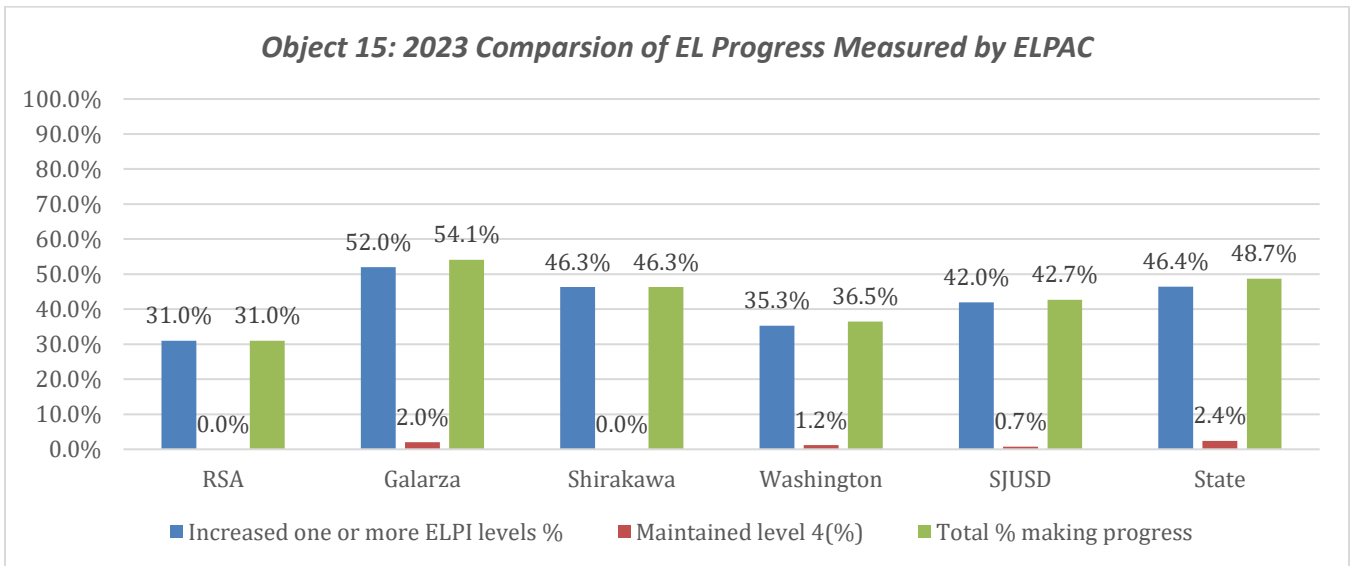
Objects 14 and 15, below (from <https://caaspp-elpac.cde.ca.gov/>), reflect the 2022-23 English Learner Proficiency Indicator (ELPI) data as evidenced on English Language Proficiency Assessment of California (ELPAC) data. This is a comparison of RSA, the State, SJUSD, and to the SJUSD schools RSA students would otherwise have attended: Galarza, Shirakawa, and Washington Elementary. ELPI is not calculated at the Countywide level. Thus, for comparison, SJUSD, where RSA is located, has been included in the analysis below. Of the comparison schools, RSA was outperformed by SJUSD, the State, and all the comparison schools in every category.

Object 14: 2023 Comparison of EL Progress Measured by ELPAC

	RSA	Galarza	Shirakawa	Washington	SJUSD*	State
Increased one or more ELPI levels	31.0%	52.0%	46.3%	35.3%	42.0%	46.4%
Maintained level 4	0.0%	2.0%	0.0%	1.2%	0.7%	2.4%
Total % making progress	31.0%	54.1%	46.3%	36.5%	42.7%	48.7%
Performance Level	Red	Green	Green	Red	Orange	Yellow
Number of Students	200	196	190	85	3,935	829,209

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

*ELPI is not calculated at the County level. For comparison SJUSD, where RSA is located, has been included.



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

*ELPI is not calculated at the County level. For comparison SJUSD, where RSA is located, has been included.

Verified Data

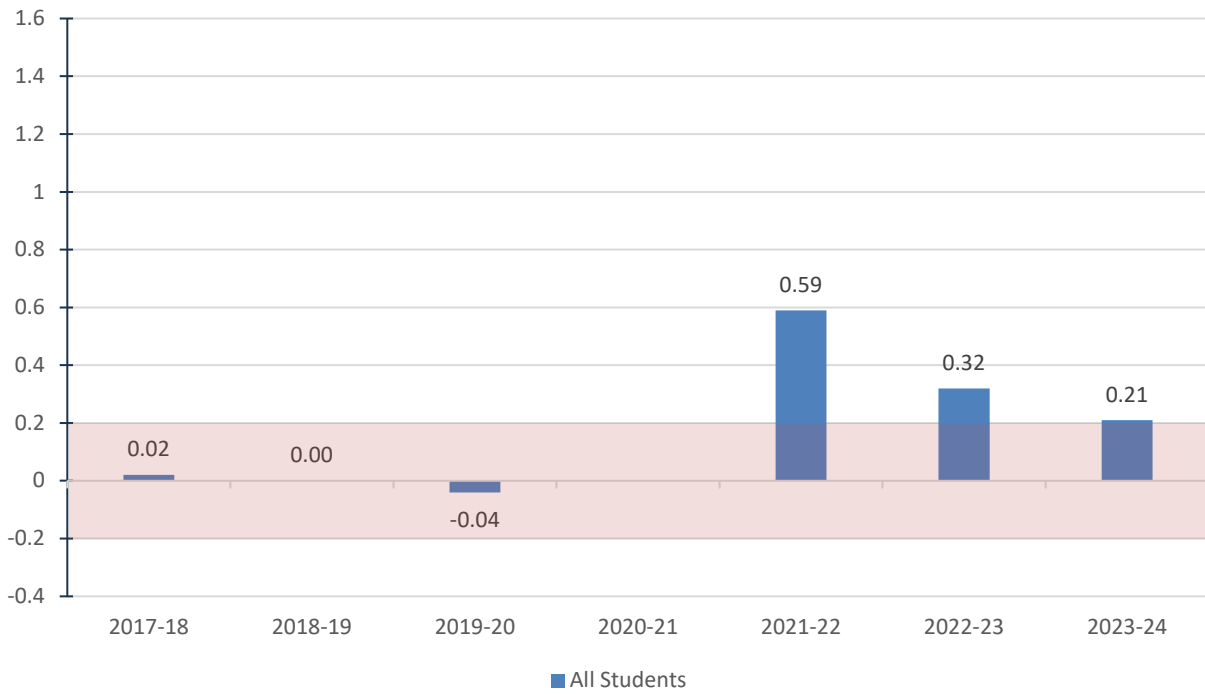
Pursuant to EC Section 47607.2(b), schools in the middle performance category are to provide additional sources of verified data to provide clear and convincing evidence to support renewal, including that the school achieved measurable increases in academic achievement, defined by at least one year’s progress for each year in school. The verified data come from a list of valid and reliable assessments and measures adopted by the State Board of Education. RSA provided data from the Northwest Evaluation Association’s (NWEA) Measures of Academic Progress (MAP) assessments to show academic growth by its students. Guidance from NWEA states schools and other educational partners can use the Conditional Growth Index (CGI) to measure the growth of groups of students, and average CGI scores within the -0.2 and 0.2 range are considered to have met growth targets for one year.

In Object 16 and Object 17 below, the CGI for each year of the charter term has been tracked for all students each year. The pink bar highlights the range for “one year’s growth,” which is -0.2 to 0.2. In both ELA and Math, all students at RSA made at least one year’s growth in each school year. No data was available in 2020-21 due to COVID. In both Objects, the schoolwide average for CGI meets or exceeds NWEA’s “one year’s growth” threshold for each year the assessment was administered.

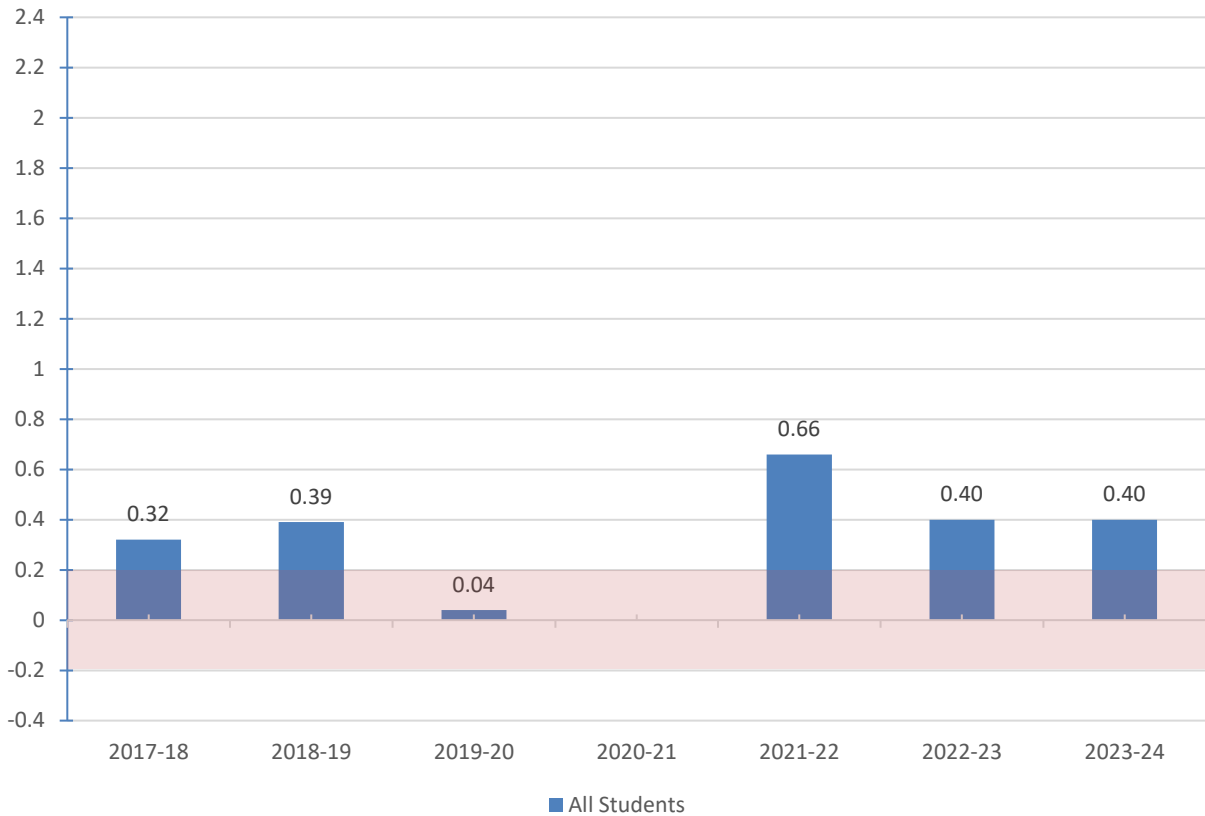
Considering RSA’s performance information, including the Dashboard and clear and convincing evidence demonstrated by verified data that RSA achieved measurable increases in academic achievement, SCCOE Staff does not recommend denial of RSA on the basis of the performance criterion. Giving greater weight to performance on measurements of academic performance, Staff does not find that RSA failed to make sufficient progress towards standards that benefit its students or that closure of RSA is in the best interests of pupils.

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Object 16: RSA NWEA MAP ELA CGI for All Students



Object 17: RSA NWEA MAP Math CGI for All Students



Renewal Site Visit

On October 8, 2024, CSD staff conducted a Renewal Site Visit to the RSA campus. CSD staff visited classrooms, met with site and network leadership, and conducted focus group interviews with educational partners, including current students, parents, and teachers. During the visit, CSD staff observed instructional practices and routines consistent with the academic model outlined in the petition.

Finances

Object 18, below, provides an eight-year historical financial summary for RSA from Fiscal Year (FY) 2016-17 through FY 2023-24. The financial data for FY 2023-24 is based on unaudited actuals, while data from prior years is supported by audited financial reports. Over these years, RSA has demonstrated a stable financial position by successfully meeting and exceeding the 4% reserve requirement in its 2017 MOU with the SCCOE.

RSA's total revenues have shown steady growth, increasing from \$6.2 million in 2016-17 to \$10.6 million in FY 2023-24. A significant increase in revenue in recent years is primarily due to various one-time funding, such as Elementary and Secondary School Emergency Relief (ESSER), Learning Loss Mitigation Funds (LLMF), and other state and federal funds received by charter schools to address the challenges presented by the COVID-19 pandemic. RSA utilized these one-time funds to meet increased operational costs, sustain continuity of education, maintain safe learning environments, and address both immediate and long-term impacts of the pandemic on students, staff, and school operations.

In line with revenue growth, total expenses have also shown an upward trend, increasing from \$6.0 million in 2016-17 to approximately \$9.8 million by 2023-24. While RSA's expenses have generally aligned with revenue growth, RSA experienced slight deficit spending in FY 2017-18 and 2022-23 in the amount of [-\$34,773] and [-\$106,326], respectively. Despite two years of slight deficit spending, RSA has maintained an average fund balance percentage of approximately 34% over the review period.

As of June 30, 2023, RSA reported an audited reserve balance of \$2,638,409, representing 27% of total expenses. The Independent Auditor's Report for the Year Ending June 30, 2023, issued an Unmodified Opinion on RSA's financial statement and its State and Federal compliance. Additionally, the audit identified no deficiencies or material weaknesses in internal controls over financial statements and compliance for fiscal year 2022-23. However, RSA had an audit finding in transitional kindergarten (TK) class enrollment for not maintaining an average class size of no more than 24 pupils and/or not maintaining a student-to-adult ratio of 12:1. This audit finding resulted in a penalty of \$22,672. This is not a repeat finding. During the SCCOE FY 2023-24 annual fiscal meeting with the Rocketship fiscal and compliance leadership team, they expressed that this audit finding is due to challenges with staffing TK classroom(s) to maintain the required adult-to-pupil ratio. The team also expressed that they anticipate remediating this audit finding for FY 2023-24. RSA has consistently fulfilled its obligations to submit all fiscal reports required by law and SCCOE in a timely manner.

The Charter Schools Department Fiscal Staff is not aware of any significant financial concerns for RSA.

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RSA Charter School

		Object 19: RSA Historical Financial Summary ¹							
		2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
[A]	Total Revenues	6,232,871	6,117,356	6,774,726	6,766,969	6,900,210	8,693,305	9,832,541	10,603,315
[B]	Total Expenses	6,003,412	6,152,129	6,647,575	6,755,336	6,622,924	8,544,023	9,938,867	9,833,932
[C] = [A - B]	Net Income (Loss)	229,459	(34,773)	127,151	11,633	277,286	149,282	(106,326)	769,383
[D]	Beginning Fund Balance	1,984,697	2,214,156	2,179,383	2,306,534	2,318,167	2,595,453	2,744,735	2,638,409
[E]	Adjustment to Beg. Fund Balance	-	-	-	-	-	-	-	-
[F] = [(C+D) + E]	Total Net Assets, End of Year	\$ 2,214,156	\$ 2,179,383	\$ 2,306,534	\$ 2,318,167	\$ 2,595,453	\$ 2,744,735	\$ 2,638,409	\$ 3,407,792
[G] = [F/B]	Fund Balance %	37%	35%	35%	34%	39%	32%	27%	35%

1. Source of Data: Audited Financial Reports for FY 2016-17 - 2022-23. FY 2023-24 is based on Unaudited Actuals.

Demographic Data

In accordance with EC Section 47607(d)(1)(B) and (C), SCCOE requested, received from CDE, and reviewed aggregate data reflecting pupil enrollment patterns and test score patterns at RSA, as well as other demographic data from CDE through the CDE website.

In Objects 19 and 20, a comparison of the average Distance from Standard (DFS) academic assessment scores is made between students who left RSA and DFS for the students remaining at RSA. Object 19 reviews the average DFS for students who left after Census Day, and Object 20 reviews the data for the students who left RSA at the end of the year and could have returned for the following school year but did not. This does not include students who would age out of the school. Based on the aggregate data from CDE, it appears students who leave RSA have not been counseled out based on lower academic performance, as the average DFS in academic assessments for students leaving and/or not returning to RSA are higher than or comparable to the students remaining at RSA. Further, the student enrollment numbers for the students who left RSA are for all grades, whereas the students tested includes grades 3-5 only. There was no statewide testing for 2019-20, therefore DFS is not available.

Object 19: Comparison of Average DFS for Students Who Left RSA After Census Day and RSA DFS

Academic Year	Subject	Enrolled Beginning of Year but Not Enrolled Conclusion	Cumulative Enrollment	Percent Enrolled Beginning Not Enrolled Conclusion	Number of Students Tested who left RSA	DFS Average for Students who left RSA	DFS Average for Students Remaining at RSA
2016-17	ELA	109	576	18.92	43	-30.19	-33.2
2016-17	Math	109	576	18.92	43	32.00	-1.7
2017-18	ELA	68	561	12.12	24	0.71	-13.1
2017-18	Math	68	561	12.12	24	42.75	-10.8
2018-19	ELA	67	551	12.16	20	-28.15	19.3
2018-19	Math	67	551	12.16	20	29.65	22.8
2019-20	ELA	33	521	6.33	5	17.60	*
2019-20	Math	33	521	6.33	5	56.00	*
2022-23	ELA	49	534	9.18	9	-58.00	-14.5
2022-23	Math	49	534	9.18	9	-41.44	-17.8

Object 20: Comparison of Average DFS for Students Attended RSA for at Least 90 days and Did Not Return the Following Year and RSA DFS

Academic Year	Subject	Enrolled for 90 days in Prior Year but Not on Census Day of Current Year	Prior Year Cumulative Enrollment	Percent Enrolled for 90 days Prior Year but Not on Census Day	Number of Students Tested who left RSA	DFS Average for Students who left RSA	DFS Average for Students Remaining at RSA
2016-17	ELA	127	588	21.60	56	-25.79	-33.2
2016-17	Math	127	588	21.60	55	9.93	-1.7
2017-18	ELA	119	576	20.66	54	-17.04	-13.1
2017-18	Math	119	576	20.66	52	25.56	-10.8
2018-19	ELA	76	561	13.55	28	32.68	19.3
2018-19	Math	76	561	13.55	28	28.25	22.8
2019-20	ELA	78	551	14.16	24	41.46	*
2019-20	Math	78	551	14.16	24	45.38	*
2022-23	ELA	65	530	12.26	19	-7.32	-14.5
2022-23	Math	65	530	12.26	19	-5.79	-17.8

Objects 21 and 22 show the cumulative enrollment data for RSA from 2016-17 to 2022-23; the total enrollment data for RSA from 2016-17 to 2023-24; and the enrollment stability data for RSA from 2016-17 to 2022-23. Cumulative enrollment data for 2023-24 was not available as it is still being formulated by CDE. Cumulative enrollment consists of the total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), regardless of whether the student is enrolled multiple times within a school or district.

Object 21: Cumulative Enrollment for RSA from 2016-17 to 2022-23

	Cumulative Total Number of Students	Number of Hispanic or Latino	Number of Asian	Number of Filipino	Number of White	Number of African American	Number of Two or More Races	Number of Not Reported
2016-17	576	478	43	*	*	23	*	*
2017-18	561	487	30	*	*	27	*	*
2018-19	551	459	33	*	11	35	*	*
2019-20	521	448	17	*	*	33	*	*
2020-21	526	444	16	*	11	43	*	*
2021-22	530	441	18	*	14	46	*	*
2022-23	534	459	14	*	11	40	*	*

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

Data is suppressed for categories if the student population (cumulative students) is 10 or less.

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Object 22: Cumulative RSA Student Group Data from 2016-17 to 2022-23

	Cumulative Total Number of Students	Number of SED	Number of EL	Number of SWD	Number of Homeless
2016-17	576	478	308	35	*
2017-18	561	493	265	46	*
2018-19	551	470	265	52	*
2019-20	521	425	296	56	*
2020-21	526	435	295	63	*
2021-22	530	413	317	71	*
2022-23	534	426	322	80	17

* Data gathered from Dataquest: <https://data1.cde.ca.gov> Data is suppressed for categories if the student population (cumulative students) is 10 or less.

The total enrollment for a school is established on California Basic Educational Data System (CBEDS) day in early October. CBEDS is a moment in time snapshot of all the educational demographic data across California. Objects 23 and 24 below, show the total enrollment demographic and student group data for the number of students enrolled in each category across the charter term for RSA on CBEDS day.

Object 23: RSA Total Enrollment Demographic Data from 2016-17 to 2023-24

	Total Number of Students	Number of Hispanic or Latino	Number of Asian	Number of Filipino	Number of White	Number of African American	Number of Two or More Races	Number of Not Reported
2016-17	576	478	43	0	0	23	0	0
2017-18	513	443	30	3	6	24	2	1
2018-19	522	437	28	1	15	34	1	5
2019-20	509	438	17	1	10	32	1	9
2020-21	514	436	15	5	11	41	1	3
2021-22	516	431	17	7	12	45	2	0
2022-23	515	441	14	6	11	40	2	0
2023-24	526	453	8	6	13	42	3	0

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

Object 24: RSA Total Enrollment Student Group Data from 2016-17 to 2023-24

	Total Number of Students	Total Number of SED	Total Number of EL	Total Number of SWD
2016-17	576	478	308	35
2017-18	513	455	247	37
2018-19	522	444	208	42
2019-20	509	409	274	43
2020-21	514	425	286	55
2021-22	516	398	308	53
2022-23	515	402	308	60
2023-24	526	398	323	67

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

RSA Charter School

Objects 25 and 26 show the Stability Rate data for RSA from 2017-18 to 2022-23. The Stability Rate is defined as the percentage of California public school students enrolled during the academic year (July 1 – June 30) who completed a "full year" of learning in one school. The Stability Rate data below shows what percentage of students stayed at RSA throughout each school year. RSA’s stability percentage is on average 93.4%. The stability rates averaged across student groups from 2017-18 through 2022-23 equivalent to the overall average: EL is approximately 94%, SED is approximately 93.9%, and SWD is approximately 96.5%.

Object 25: RSA Enrollment Demographic Stability Percentage Data from 2017-18 to 2022-23

	Total Number of Students	% Total	% Hispanic or Latino	% Asian	% Filipino	% White	% African American	% Two or More Races	% Not Reported
2017-18	495	88.2	88.1	93.3	*	*	85.2	*	*
2018-19	493	89.5	90.4	84.8	*	100	88.6	*	*
2019-20	500	96.0	96.0	100	*	*	93.9	*	*
2020-21	507	96.4	96.6	93.8	*	100	95.3	*	*
2021-22	504	95.1	95.7	88.9	*	85.7	93.5	*	*
2022-23	507	94.9	95.0	85.7	100	100	97.5	66.7	*

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

*To protect student privacy, data are suppressed population size within a selected student population (eligible cumulative enrollment) is 10 or less.

Object 26: RSA Student Group Stability Percentage Data from 2017-18 to 2022-23

	Total Number of Students	Stability Percentage SED	Stability Percentage EL	Stability Percentage SWD
2017-18	495	89.0	89.1	93.5
2018-19	493	90.0	89.1	98.1
2019-20	500	96.2	96.6	98.2
2020-21	507	96.6	97.3	100.0
2021-22	504	96.4	96.5	94.4
2022-23	507	95.3	95.3	95.0

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

REVIEW OF THE CHARTER PETITION

SCCOE Staff reviewed the Renewal Petition using the criteria established in California *EC* Sections 47605.6(c), 47607, and 47607.2, consistent with County Board Policy 0420.4(c), and found the following:

1. Sound Education Program

Rocketship Alma Academy, as part of the broader Rocketship Public Schools network, follows a consistent educational model based on three foundational pillars: (1) personalized learning, (2) talent development, and (3) parent empowerment. These pillars serve as the foundation for RSA’s program, which aims to unlock the potential of every student by tailoring the learning experience to meet individual needs, fostering growth among educators, and engaging parents as advocates for their children’s education.

RSA provides instruction through a blended learning model. Students rotate between four distinct content blocks: Humanities, STEM (science, technology, engineering, and mathematics), Learning Lab, and Enrichment. This block schedule allows teachers to specialize in specific content areas, increasing instructional quality through collaboration and focus. The curriculum is aligned with the Common Core State Standards (CCSS) and Next Generation Science Standards (NGSS) and integrates social-emotional learning alongside academic content. Teachers lead a combination of whole-group, small-group, and individualized instruction to ensure that students receive targeted support based on their academic needs.

Each Rocketship school adopts four core values (persistence, empathy, responsibility, and respect), with a unique fifth value selected by the school. RSA's additional value is "Service," emphasizing service as a means to improve the school and larger community. Social-emotional learning (SEL) is integrated through the Positive Behavior Interventions and Supports (PBIS) framework and The Shortest Distance SEL curriculum, helping students articulate and manage their emotions effectively. RSA further strengthens the school-home connection through tools like Parent Square. Parent engagement remains a cornerstone of RSA's model, with teachers visiting every student's home at the start of the school year to build strong relationships.

Finally, RSA affirms its commitment to serving a predominantly socio-economically disadvantaged student population, with a significant percentage of English learners and students requiring special education services. The school actively seeks to close the achievement gap for students who often enter below grade level, utilizing personalized, data-informed instruction and a community-centered approach to education. By participating in initiatives like the California Community Schools Partnership Program, RSA ensures students and families receive the support they need, from academic interventions to mental health and social services. RSA's Learning Lab and Online Learning Platforms (OLPs) are central to its personalized learning model, offering tailored academic support outside the traditional classroom setting. The Learning Lab provides students with opportunities for small-group instruction, enrichment, and intervention. During this time, students can engage with hands-on activities, independent reading, or targeted skills practice. The Lab is staffed by Individualized Learning Specialists (ILSs), who help monitor and facilitate learning interventions, often with the support of online learning programs.

Students Performing Below Grade Level:

RSA serves a significant portion of students who enter the school performing below grade level and are considered "at promise students." The school's educational program is designed with personalized learning pathways that address the unique needs of these students. The instructional model uses real-time data from assessments to guide interventions and instructional adjustments. Teachers and ILSs provide targeted small-group instruction and differentiated learning activities to address gaps in foundational skills. Data from assessments such as Dynamic Indicators of Basic Early Literacy Skills (DIBELS) and bi-monthly standards-based tests help inform these interventions, ensuring that students receive the support they need to progress toward grade-level mastery.

To ensure that students performing below grade level are consistently monitored, RSA employs a tiered approach to instruction. Through the Multi-Tiered Systems of Support (MTSS) framework, at-risk students receive tiered interventions, starting with core classroom instruction and progressing to more intensive support if needed. This model includes not only academic tutoring but also enrichment opportunities to build confidence and engagement in learning. Personalized learning platforms also play a role in helping students reinforce foundational skills through adaptive, individualized lessons, further allowing them to

bridge learning gaps. The school emphasizes proactive intervention to prevent further academic delays, striving to move students toward grade-level proficiency through structured remediation.

The Charter includes a discussion of Extended Learning Time for RSA students. RSA affirms that it will meet the or exceed the minimum state requirements for annual instructional minutes. This section specifies that RSA reserves “the right to adjust students’ instructional minutes in each subject and learning space based on students’ personalized learning needs.” As a condition of approval RBM’s 2017 Renewal and RBM’s 2017 MOU – which were processed prior to RSA’s most recent charter renewal – RBM was required to add language specifying “No such adjustments shall result in Brilliant Minds meeting the minimum number of instructional minutes from instruction by any individual other than a credentialed teacher.” When RPS submitted RSA’s request for renewal in 2017, the corresponding language had been updated and included in the RSA 2017 renewal petition, so it was not necessary for this to be a condition of approval of RSA’s most recent renewal. This provision of the Renewal Petition has been modified to specify that “instructional minutes” are defined as “minutes spent under the immediate supervision and control of a certificated employee ((Education Code Section 47612.5()),” and omitting the prior language about instruction by certificated teachers. As such, all instructional minutes as described in the Renewal Petition, even if “adjusted” as described therein, are, by definition, under the immediate supervision of a properly credentialed employee, so the additional assurance language required at the time of the last renewal is not necessary.

Special Education:

RSA's special education program is grounded in the principles of inclusion and tailored support for students with exceptional needs. As a member of the El Dorado County Charter SELPA, RSA operates as an independent Local Educational Agency (LEA) for special education. This affiliation enables the school to receive state and federal funding directly and to ensure compliance with all applicable laws, including the Individuals with Disabilities Education Improvement Act (IDEA). RSA states it is committed to providing a free and appropriate public education to all students, regardless of disability, and to working collaboratively with the SELPA to meet these obligations. RSA also states it is committed to, and has plans and staffing to enable, compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act.

Staffing at RSA includes a team of special education professionals, including special education teachers, paraprofessionals, and education specialists. These staff members participate in ongoing training through RPS, the county, or the SELPA to ensure they are equipped to meet the diverse needs of students. RSA also employs or contracts with itinerant staff such as speech therapists, occupational therapists, and behavioral therapists to provide necessary related services as indicated in students' Individualized Education Programs (IEPs).

RSA's approach to inclusion involves both push-in and pull-out support strategies. Push-in support allows special education staff to work alongside general education teachers in the classroom, providing targeted assistance to students with special needs. Pull-out support is available for students requiring more intensive, small-group instruction to make academic progress. This support can focus on accessing grade-level content or addressing foundational skill gaps. Related services, including speech therapy, counseling, and occupational therapy, are provided based on the specific needs outlined in each student's IEP.

IEP teams at RSA include special education teachers, general education teachers, parents, RPS representatives (if necessary), SELPA representatives (if necessary), and other relevant professionals. These teams work with parents and guardians to ensure their participation, providing interpreters and

alternative meeting methods, as necessary. IEPs are reviewed annually to assess their effectiveness and are reassessed every three years as part of a comprehensive reevaluation. RSA ensures all accommodations, modifications, and services outlined in the IEPs are implemented by qualified personnel and progress is communicated to parents.

Object 27: 2023-24 Special Education Enrollment by Program Setting for RSA and Comparison Schools and County and State

	Rocketship Alma Academy	Ernesto Galarza Elementary	Shirakawa (George Sr.) Elementary	Washington Elementary	County	State
Special Education Enrollment	67	44	62	64	29,459	836,846
Regular Class 80% or More of the Day	97.0%	65.9%	61.3%	48.4%	56.8%	59.1%
Regular Class 40-79% of the Day	0.0%	15.9%	4.8%	10.9%	17.5%	15.2%
Regular Class 39% or Less of the Day	1.5%	6.8%	16.1%	32.8%	17.3%	17.1%
Separate School & Other Settings	0.0%	0.0%	0.0%	0.0%	2.6%	2.5%
Preschool Setting	1.5%	11.4%	17.7%	7.8%	5.8%	6.1%
Missing/Unknown	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

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

English Learners (EL):

RSA integrates English Language Development (ELD) standards into its instructional program, ensuring both integrated and designated support for English Learners (ELs). The school uses data-driven strategies to monitor the progress of ELs, employing assessments like the state-mandated English Language Proficiency Assessment of California (ELPAC) and ongoing classroom evaluations. This helps identify specific linguistic gaps, allowing teachers to design targeted interventions and adjust instruction to meet individual language development needs. Teachers employ explicit vocabulary instruction and ensure that ELs engage with content through scaffolded academic language strategies.

Additionally, RSA supports English Learners by integrating ELD with content learning, particularly in literacy and STEM subjects. Teachers are trained to differentiate instruction by incorporating strategies such as visual supports, modeling language use, and fostering collaborative learning environments where ELs practice academic discussions. ELs are also exposed to diverse reading materials that build both language proficiency and content knowledge, contributing to their holistic academic development.

Designated instruction is a protected time during the school day when teachers use English Language Development (ELD) standards to help English Learners (ELs) develop the language skills necessary for academic success. This instruction is integrated with content learning and focuses on developing discourse practices, grammar, and vocabulary. Teachers group students based on their language development stage (expanding, emerging, bridging) to target specific needs and accelerate their progress in English. There is a strong emphasis on oral language development, alongside reading and writing tasks. For example, teachers may guide students through analyzing language in texts, learning academic vocabulary, and engaging in discussions or debates to reinforce language comprehension and use.

Educational Leadership

The Principal and Assistant Principals are the educational and instructional leaders at RSA, in addition to being responsible for teacher supervision, evaluation, and providing input and approval of each faculty and staff member's Goals. In the 2017-2025 RSA Charter, administrators are required to possess valid teaching credentials. Notably, however, this requirement has been removed from the employee qualifications in the Renewal Petition. Staff notes that RSA revised the qualifications for the positions of Principal and Assistant Principal by eliminating the requirement that these positions require a valid teaching credential. The sample job descriptions for the Principal and the Assistant Principals included in the Renewal Petition also specify that the positions only require "2+ years of teaching experience in an urban city classroom and realizing significant gains," consistent with the elimination of the credential requirement in Element F of the Charter. The proposed elimination of this significant professional qualification for the positions of Principal and Assistant Principal constitutes a request for material revision to the Charter as employee qualifications are a required charter element, and this proposed change has a potentially substantial effect on the quality of the educational program and teaching at RSA, impacting the overall soundness and implementation of the program. (EC 47605.6(c)(1), (2), and (5)(F).) The SCCBOE may act on the material revision request separately from its action on the request for renewal.

The job duties assigned to these administrative positions are consistent with the need for at least a valid teaching credential, if not an administrative credential. This is particularly true in light of the mandate that all charter schoolteachers now hold the California Commission on Teacher Credentialing certificate, permit, or other document required for the teacher's certificated assignment. RSA's Principal and Assistant Principals should also meet this requirement applicable to the teachers they train, supervise, and evaluate. As such, there is a greater need for a teaching credential, and CSD Staff finds specifically a California teaching credential, for these leadership positions now than at the time of approval of the current charter. The lack of a California teaching credential for a person holding one of these positions could negatively impact the quality of educational services provided to RSA students, and requiring teaching credentials is consistent with the County Board of Education's expressed expectations for charter schools under its oversight in order to help ensure a sound educational program. Additionally, if RSA administrators "cover" classes for teachers when a substitute is not available, they are required to hold a California teaching credential, or at least a substitute credential. This proposed material revision to the Renewal Petition may result in a situation in which the Principal or Assistant Principals would be unable to cover classrooms when needed.

In considering RSA's request for material revision to the employment qualifications for these two academic leadership positions, it is instructive to review the specific descriptions of the job duties for the positions, as specified in the Renewal Petition.

The Charter specifies the following regarding the role of the Principal (emphasis added):

The Principal is the instructional, cultural, managerial, and community leader of the Charter School. The Principal sets the vision for the Charter School and **ensures that the Charter School is a high-achieving college preparatory environment where all students finish the fifth grade at or above grade level. Additionally, the Principal directly manages, supports, and develops the Assistant Principal and the Office Manager. The Principal may serve as the manager and coach of all educators, which includes conducting observation cycles, modeling lessons, and providing support and resources aimed at increasing teacher effectiveness and leadership.** The Principal is also

responsible for engaging and empowering parents to become lifelong advocates for their children's education.

The Charter specifies the following role for the Assistant Principals (emphasis added):

RSA will have at least two Assistant Principals, focused full-time on the implementation of RSA's academic systems and mentoring teachers to improve their effectiveness.

Reporting directly to the Principal, the Assistant Principal plays a critical role in driving academic achievement for students. The Assistant Principal ensures academic excellence by working closely with the Principal to lead and implement the instructional vision for the Charter School. The Assistant Principal leads two primary streams of work: teacher coaching and professional development ("PD"). The Assistant Principal directly coaches a number of educators, which includes conducting observation cycles, modeling lessons, co-planning lessons, real-time coaching, and providing support and resources aimed at increasing teacher effectiveness and leadership. The Assistant Principal also leads the design and implementation of group teacher professional development and collaborative planning time. This individual provides staff with the appropriate resources and support to ensure that each Rocketship school's Rocketeers realize over a year's worth of progress annually.

As evidenced by the educational and academic leadership, modeling, coaching, planning, and related duties of these positions, at minimum these educational leadership positions should require valid teaching credentials, if not administrative credentials. Rocketship provided no explanation or justification in the Renewal Petition for this proposed substantial reduction in the qualifications for these educational leadership positions. These revisions are inconsistent with the duties of the positions, and undermine the soundness of the educational program, undermine the ability to implement the educational program as the persons holding the positions responsible for leadership and management of such implementation would not be required to be properly qualified, and do not constitute a reasonably comprehensive description of the Employee Qualifications element of the Renewal Petition as the proposed qualifications for the positions are inconsistent with the job duties.

In its response to the RSSP recommendations, RPS specified:

At the outset, we wish to clarify an important point: the Element E revisions in question in the Staff Report as they relate to the employment qualifications for the Principal and Assistant Principal in the RSSP renewal petition were made to accurately reflect the legal framework under which RSSP operates. Specifically, as a charter school, RSSP is not legally obligated to require the Principal or Assistant Principal to have any particular credential. Notwithstanding that framework, at this time we would like to make clear that we agree with the practice of having our Principal and Assistant Principal hold a valid teaching credential. Moreover, we would like to highlight that all principals and assistant principals at RSED-operated charter schools hold the credential. Therefore, we are prepared to work with SCCOE to update our petition, without the need to pursue a material revision to the charter, to clarify that the Principal and Assistant Principal positions must be held by an individual with a teaching credential.

Staff notes that it does not agree with RPS's framing of this issue as "accurately reflecting the legal framework" under which its schools operate since charter school administrators are not legally required

to hold any particular credential. The Charter Schools Act specifically requires that this element of each charter set forth a reasonably comprehensive description of the qualifications for employment by the particular charter school. Thus, it is incumbent on RPS to specify in each charter the qualifications for employment in each position, including the positions of Principal and Assistant Principal, not that it eliminate appropriate qualifications from the positions on the basis that a particular qualification is not legally required. In any event, it appears that, given its agreement that a teaching credential is an appropriate qualification for these positions, RPS is indicating that it is not interested in pursuing the material revision included in the Renewal Petition to delete the teaching credential requirement for these positions, which Staff acknowledges and appreciates.

SCCOE Staff recommends the SCCBOE deny these material revisions to the RSA charter and maintain the minimum requirement for the positions of Principal and Assistant Principals requiring a valid teaching credential. Moreover, Staff recommends that the SCCBOE require that these positions include a California teaching credential as a minimum qualification and that a valid administrative credential is preferred as requirements necessary for the sound operation of RSA as a countywide charter school.

The Charter Schools Department Staff concluded the RSA Renewal Petition provides sufficient information to substantiate the required elements for a sound educational program, apart from the credential requirements for the Principal and Assistant Principal positions. As such, Staff recommends denying the material revisions to the Renewal Petition and requiring the Principal and Assistant Principals' employment qualifications to be updated to include valid California teaching credentials and to specify valid administrative credentials are preferred for these positions.

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

Staff found facts demonstrating the Petitioners are likely to successfully implement the program only if RSA resolves the identified requirements, concerns, and conditions through the MOU or an addendum to the MOU, as described more fully throughout this Staff Analysis and Findings of Fact and if the SCCBOE denies the request for material revisions to eliminate the requirement that the Principal and Assistant Principal employment qualifications include, at minimum, a valid teaching credential and instead require a California teaching credential for those positions, because eliminating that requirement would negatively impact program implementation, as described in greater detail above and incorporated herein by this reference.

3. Affirmation of each of the conditions required by statute

SCCOE Staff found the Renewal Petition contains the required affirmations. While the Affirmations section at the beginning of the Charter does not specify that the notice prepared by the California Department of Education per *EC 47605.6(e)(4)(D)* will be posted on the website, that affirmation is part of the reasonably comprehensive description later in the Renewal Petition and Staff confirms the notice is posted on RSA's website.

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 Petition to include a description, but, rather, the description in a countywide charter petition must 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 addendum process. Further, while SCCOE may, in this Staff Analysis, 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 or an addendum to the MOU, this does not mean other areas may not need additional correction to be included in the MOU or in an addendum to the MOU. Further, Staff's determination that an element is reasonably comprehensive may be premised on noted issues being remediated through the MOU and addendum process.

The Charter Schools Department Staff found, as detailed below, that additional specificity and requirements governing RSA's educational program, governance and operations, including its compliance with the required charter elements, will need to be addressed through the MOU and/or an addendum among RSA and the SCCOE.

In preparing the Renewal Petition, RSA appears to have overlooked some updates. For example, failing to fully update the petition to designate the County as the authorizer. This Staff Analysis will not detail each of these omissions and concerns, but SCCOE Staff recommends the SCCBOE require RSA to address these oversights and omissions because this is necessary for the sound operation of RSA as a countywide charter school.

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

The instructional approach at RSA is heavily data-driven, with continuous assessments guiding instructional planning and interventions. RSA's Program Team collaborates with analytics and school staff to develop curriculum maps, analyze student data, and refine instructional strategies as needed. The focus is on fostering critical thinking, problem-solving, and meta-cognitive skills across subject areas, ensuring students can apply their knowledge in novel situations. RSA also emphasizes the development of writing skills and mathematical reasoning.

RSA's core curriculum is designed to align with California's Common Core State Standards (CCSS) for English/Language Arts (ELA) and Mathematics, as well as the Next Generation Science Standards (NGSS) for science and state standards for History-Social Science. In ELA, the curriculum focuses on building literacy skills across reading, writing, speaking, and listening. The school uses an integrated approach, combining phonics, reading comprehension, and writing instruction to develop students' critical thinking and communication skills. A heavy emphasis is placed on reading both literature and informational texts, ensuring students can analyze, synthesize, and respond to complex material. Writing instruction follows a structured process, teaching students to articulate ideas across various genres, including narrative, informative, and argumentative texts.

Mathematics instruction at RSA is centered on building conceptual understanding through problem-solving and application of mathematical practices. The program emphasizes the eight Mathematical Practice Standards and uses the Eureka Math curriculum to guide daily lessons. Students engage in fluency activities, collaborative problem-solving, and independent practice, with regular assessments guiding instruction. Science and Social Science are taught in an integrated format, where science content is embedded into STEM blocks, and social science topics are included within ELA lessons. This approach ensures that students are consistently exposed to cross-curricular content.

Online Learning Platforms further individualize instruction by providing adaptive lessons that adjust based on a student's progress. Programs like Lexia Core 5, ST Math, and Reflex allow students to work at their own pace, practicing skills where they need the most help. These platforms also generate data that teachers and school leaders use to personalize instruction further, creating a seamless feedback loop that supports both in-class and independent learning. This technology ensures that students receive continuous, personalized instruction that adapts to their evolving needs.

The Charter Schools Department Staff concluded the RSA Renewal Petition provides sufficient information to substantiate the required elements for a sound educational program, only with the denial of the material revision to the Principal and Assistant Principals' employment qualifications and a requirement for these positions of a California teaching credential, with a valid administrative credential preferred, given their central roles in educational and academic leadership, planning, and implementation of the educational program, as discussed more fully above.

B. Element Two: Measurable Student Outcomes

RSA's student outcomes are tied to both state and school-specific priorities, with a focus on academic achievement, student safety, attendance, and campus climate. Key outcomes include meeting or exceeding CAASPP standards in English Language Arts, mathematics, and science, as well as goals for student growth in reading and English Language proficiency. 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. Some outcomes, such as CAASPP performance and growth metrics in reading, are associated with specific years and must be updated annually to reflect new targets.

RSA's Renewal Petition affirms that these outcomes cover a broad range of student skills, from academic performance to social-emotional well-being. In the Renewal Petition, RSA commits to continually updating its goals and performance expectations to reflect the evolving needs of students and state requirements.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description.

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

To measure the student outcomes listed in Element B, RSA utilizes several standardized assessments. These include the CAASPP for English Language Arts, Mathematics, and Science, the Smarter Balanced Assessments, and the California Standards Test for Science for fifth graders. English Learners are assessed annually through the English Language Proficiency Assessments for California (ELPAC). Additionally, RSA administers the DIBELS assessments three times per year for K-5 students to measure literacy development, and the NWEA MAP interim assessments are used three times annually to track student progress in both reading and math.

In addition to these standardized tools, RSA uses various internal assessments developed by Rocketship Public Schools. These include formative assessments for daily learning, such as teacher observations, lesson exit tickets, and writing checklists. The school also implements unit-based

assessments in core subjects like mathematics and science to evaluate student understanding and progress. Interim assessments are used throughout the year to gauge students' mastery of content and prepare them for end-of-year summative evaluations.

Assessment data is integral to driving instruction at RSA. Teachers frequently analyze individual and class-level performance to identify patterns, areas of strength, and students in need of additional support. Data dashboards help streamline this process by providing real-time insights, allowing teachers and school leaders to make informed decisions that enhance student achievement. This data is shared with educational partners, including parents, through progress reports and conferences, and with chartering authority and other relevant entities through formal reports.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description.

D. Element Four: Location

The RSA Renewal Petition states Rocketship Alma will be located at 198 West Alma Avenue in San Jose, California. The facility was originally built for RSA's specific program and has been updated and maintained through RSA's occupancy.

E. Element Five: Governance Structure

The Rocketship Alma Academy charter school is operated and governed by Rocketship Education doing business as Rocketship Public Schools, a tax-exempt 501(c)(3) California nonprofit public benefit corporation. The RSA Renewal Petition states the RPS Board will consist of at least three (3) members and no more than twenty-five (25), including parent members. The Charter recognizes the chartering authorities' rights to appoint a representative to the Board. The RSA Renewal Petition shows that RSED/RPS currently has twenty-one (21) seats on its Board. RSA provided the board member names and qualifications as required. The description of the Governance Structure is also specifically supplemented by a number of provisions of the 2017 MOU.

The Bylaws specify that any representative of a chartering authority pursuant to the Charter Schools Act "shall serve only in the authorizer's discretion," but also include the contradictory statement that such representatives "shall be reviewed by the Nominating Committee and all other approval protocols followed by other nominated members of the Rocketship Board." This is inconsistent with both the provisions of *EC* Section 47604(c) and the explicit requirements of the 2017 MOU, which specify that the SCCBOE or its designee, at its discretion, shall appoint the SCCBOE representative and that such representative shall serve solely at the SCCBOE's discretion. The Nominations Committee process in the Bylaws provides for the Nominating Committee to identify and nominate potential candidates for the RSED/RPS Board and the Board votes on such appointments. Such a process by which the RSED/RPS Board may vote to approve or deny the SCCBOE representative is thus inconsistent with the sole discretion of the SCCBOE or its designee to appoint the representative. Additionally, the Bylaws provide that the RSED/RPS Board may remove any director, with or without cause, by majority vote, without exempting any SCCBOE representative from that process. Again, that is contrary to the specific requirement that any SCCBOE representative shall serve at the SCCBOE or designee's sole discretion and would fundamentally undermine the chartering authority's ability to designate a representative as it

deems appropriate, as provided in the Charter Schools Act. These provisions of the Bylaws are also inconsistent with addenda to other memoranda of understanding among SCCOE and RPS that require that the Bylaws must specify that “no limitations or qualification for service on the RPS Board applicable to other members shall apply to any such SCCBOE representative, who will be selected in the SCCBOE or designee’s sole discretion.” As such, the Bylaws must be revised to exclude any SCCBOE representative pursuant to EC Section 47604(c) from any rules, requirements, or procedures for selection, appointment, or removal from the RSED/RPS Board and affirm that all such determinations are within the SCCBOE or designee’s sole discretion.

In its response relative to the RSSP recommendations, RPS asserted that it could address the concerns relative to the selection, appointment, or removal of a representative to the RSED/RPS Board in an MOU. RPS specified, “There should not be a need to amend the Bylaws to include for this [sic]. The reasoning behind this is that nonprofit corporate governance law and standards reserve certain rights of the Board of Directors. Amending By-laws is no light issue, and it is something that is done infrequently and at the Board’s discretion.” SCCOE Staff disagrees with RPS’s assertions on this point. The corporation is bound to comply with law, including the Charter Schools Act, its various charters and MOUs, and is also bound to comply with the terms of its Bylaws. As detailed above, the current Bylaws are in direct conflict with the rights of chartering authorities to appoint representatives and the provisions of the SCCBOE-approved RPS charters and MOUs, including the 2017 MOU, which is incorporated into the current RSA charter and Renewal Petition. RPS may not agree through the MOU to violate the provisions of its Bylaws and continue to maintain those Bylaws without updating them to be consistent with its other legal obligations. As such, the Bylaws must be revised.

The Renewal Provision also specifies that the RPS Board has created a California Committee, comprised of parents and civic and business leaders, that serves as an advisory board to the Board of Directors. This California Committee provides advice and counsel to the California Executive Director and input to the Board of Directors on topics such as plans and strategies for local growth, model improvement, and operational plans, and builds partnerships to enhance the quality and sustainability of RPS schools.

The Renewal Petition specifies RSA shall comply with the Brown Act, the Political Reform Act of 1974, and *Government Code* Section 1090 et seq., and provide annual training on these topics. No interested persons may serve on the board.

The Renewal Petition states the Board will comply with all federal, state, and local laws applicable to independent public charter schools and has adopted a Conflict of Interest (COI) Code (included in the appendix section) that has been approved by the County Board of Supervisors. The COI Code was approved on March 31, 2022.

In accordance with the Political Reform Act and the Conflict of Interest (COI) Code, all directors and senior RSED/RPS and RSA staff are required to file a “Form 700” annually disclosing specified interests. During the charter term, SCCOE staff have reviewed the Forms 700 filed on behalf of RSED/RPS reporters and found that directors or staff have identified reportable interests as required.

RSA has both a School Site Council and an English Learner Advisory Committee that encourage parents to advocate and participate in their children’s education.

Consistent with the requirements of the 2017 MOU, the Bylaws provide that written notice of any proposed revisions to the RSED/RPS Articles of Incorporation or Bylaws shall be submitted to the County Superintendent at least three weeks prior to the RSED/RPS Board's consideration of the revision(s). If the County Superintendent or designee considers the proposed revision(s) to be a material revision to RSED/RPS's governance structure or a charter authorized by the County Board, such revision(s) may not be adopted unless and until the revision(s) is first approved through the material revision process.

RSED/RPS adopted revised Bylaws at its April 18, 2023, meeting. These revisions were undertaken without compliance with this prior notice requirement, so it is necessary for RPS to come into compliance with this requirement of the charter/2017 MOU and its Bylaws by providing notice now of the specific revisions that were made in 2023. If the County Superintendent determines that the revisions constituted a material revision to the governance structure or charter, RPS will need to take action to reverse those revisions and/or seek approval of a material revision to comport with its desired Bylaws revisions.

The Charter provides for the RSED/RPS Board to delegate the implementation of its duties (other than those specifically excluded from such delegation authority) to employees or other responsible parties. The Board currently oversees operations, with day-to-day authority delegated to the Chief Executive Officer. It must be made clear through the MOU or an addendum thereto that the Board may not delegate the authority to close Rocketship Alma Academy charter school, as that must be a decision of the Board. The Principal is the senior authority at the school site, but final management authority is with the CEO and ultimate overall organizational authority retained by the Board.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description with the clarification regarding closure and only if the Bylaws are revised, as described above, to exclude any SCCBOE representative pursuant to *EC 47604(c)* from any rules, requirements, or procedures for or involvement by the Nominating Committee or RSED/RPS Board in the selection, appointment, or removal from the RSED/RPS Board and to affirm that such appointment, service, and removal is within the sole discretion of the SCCBOE or designee and if RSA comes into compliance with its obligations relative to Bylaws revisions.

F. Element Six: Employee Qualifications

RSA states it recruits qualified personnel for all administrative, instructional, instructional support, and non-instructional support capacities. RSA further asserts the staff recruited believe in the instructional philosophy outlined in its vision statement. In accordance with *EC Section 47605.6(b)(5)(f)*, RSA shall be nonsectarian in its employment practices and all other operations. RSA shall not discriminate against any individual (employee or student) on the basis of the characteristics listed in *EC Section 220* (actual or perceived disability, gender, gender identity, gender expression, nationality, race or ethnicity, religion, sexual orientation, or any other characteristic 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).

Staff notes that RSA proposed material revisions to this element of the Renewal Petition by revising the qualifications for the positions of Principal and Assistant Principal by eliminating the requirement that these positions require a valid teaching credential. SCCOE Staff believes that

this change would negatively impact the school's educational program and soundness, is inconsistent with best practices particularly in light of the changes to the law to require all charter school teachers to hold credentials and eliminating the "flexibility" afforded to some charter school teachers, is inconsistent with the job duties of these positions, specifically including the educational and instructional leadership duties, and inconsistent with the requirements necessary for the sound operation of a countywide charter school. Possession of at least a California teaching credential is necessary even to allow those administrators to cover classrooms or teach classes as needs arise. The job duties assigned to the RSA Principal and Assistant Principal – including but not limited to supervision, one-on-one coaching, and evaluation of teachers, and the Principal's role as the instructional leader of the school and the Assistant Principals' full-time focus on "the implementation of RSA's academic systems and mentoring teacher to improve their effectiveness" – are consistent with the need for at least a valid California teaching credential, if not an administrative credential. SCCOE Staff recommends that the SCCBOE deny the requested material revisions to these employment qualifications and instead require the minimum qualifications for the positions of Principal and Assistant Principal include a valid California teaching credential and specify that an administrative credential is preferred.

RSA continues to work with SCCOE Human Resources to make sure that the teaching staff meet all the legal requirements for them to perform as teachers. RPS has an experienced teacher as its network program director and two specialists who are supporting the special education staff at the site and across the network to monitor all special education needs.

As part of the annual review process, SCCOE Staff will determine whether all RSA Staff meet the current credentialing requirements.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description only if the SCCBOE denies the material revision to the charter and requires that the minimum qualifications for the Principal and Assistant Principals include a valid California teaching credential and specify that an administrative credential is preferred for these positions.

G. Element Seven: Health and Safety

The Renewal Petition specifies that Rocketship maintains and regularly reviews and updates Board-approved policies and procedures to ensure the health and safety of students and staff. RSA 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 *EC* Section 47605.6(b)(5)(g), *EC* Section 44691, and all other legal requirements, and RSA states it is committed to providing a safe, compliant working environment. RSA submitted its 2023-24 Comprehensive School Safety Plan and declared RSA will review and update the plan by March 1 of every year and that the plan shall include the required safety topics. The Renewal Petition specifies that its Employee Handbook, School Safety Plan, and Student/Parent Handbook are all reviewed, updated, and presented to the RPS Board annually for approval in order to ensure ongoing compliance with state and federal laws and regulations. RSA 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.

The referenced Board-approved policies and procedures were not readily located by CSD staff on the Rocketship website, including, but not limited to, the required Title IX Policy and Grievance Procedure, the Uniform Complaint Procedures, or any other complaint policies and procedures or

other health and safety policies and procedures. While the handbooks included in the appendices refer to some such procedures – such as the mandatory Title IX Policy and Grievance Procedure – those policies are not set forth in full in the handbooks. In order for many of the required policies and procedures to be appropriate, effective, and comply with law, they must be readily available to students, parents, staff, chartering authorities, and the public. As such, CSD staff recommends that RSA be required to make these policies and procedures readily locatable on its website to the County Superintendent or designee’s satisfaction. Staff appreciates that in its response to the RSSP recommendations, RPS provided direction on where to locate some of these items on the website and specified that it is willing to work on this in consultation with CSD Staff. The identified location does not include copies of each of the actual policies and procedures, and Staff continues to believe that this is an area that can be improved upon and looks forward to working with RSA on this issue.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description only if RSA is required to ensure through the MOU/addendum that its policies and procedures, including but not limited to its full complaint policies and procedures, can be readily located on its website. The Charter Schools Department Staff notes the 2024 MOU provided to RSA includes supplemental information on compliance with additional health and safety requirements.

H. Element Eight: Racial, Ethnic, English Learner, and Special Education Balance

On July 1, 2020, AB 1505 took effect, updating Element H 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 SCCBOE. RSA’s Renewal Petition has been updated to reflect this updated requirement.

Object 28, below, demonstrates that RSA's student race/ethnic group distribution is not reflective of the surrounding County (SCC) and the schools that RSA students would otherwise attend. The Hispanic or Latino population at RSA is 86.1%, larger than the 40.5% at SCC, while the Asian population is much lower at RSA (1.5%) compared to SCC (30.8%). RSA looks more like Galarza than the other comparison schools.

Object 29, below, highlights differences in student group populations between RSA and SCC. Notably, RSA has a significantly higher percentage of ELs at 61.4% compared to 22.6% in SCC but is comparable to other comparison schools. RSA’s population SWDs is comparable to SCC and the other comparison schools. The SED population at RSA, at 75.7%, is higher than SCC's 38.1, although Galarza and Washington have higher populations (80.2% and 85.5%, respectively).

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Object 28: Comparison of 2023-24 Demographic Data Among RSA, SCC, and Schools RSA Students Would Otherwise Have Attended

	Hispanic or Latino	Asian	Filipino	White	African American	Two or More Races
RSA	86.1%	1.5%	1.1%	2.5%	8.0%	0.6%
SCC	40.5%	30.8%	3.6%	15.7%	1.7%	5.9%
Galarza	84.5%	4.3%	0.9%	3.7%	2.5%	4.0%
Shirakawa	51.6%	32.4%	3.5%	4.8%	2.7%	3.7%
Washington	96.8%	0.6%	0.0%	0.6%	0.9%	0.9%

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

Object 29: Comparison of 2023-24 Student Group Data Among RSA, SCC, and Schools RSA Students Would Otherwise Have Attended

	Total Number of Students	SED	EL	SWD
RSA	526	75.7%	61.4%	12.7%
SCC	234,027	38.1%	22.7%	12.1%
Galarza	323	80.2%	44.3%	12.7%
Shirakawa	519	65.1%	43.4%	9.8%
Washington	344	85.5%	75.3%	18.6%

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

RSA’s recruitment plan outlines broad strategies to attract a student population reflective of the County. The plan includes both outreach and admissions practices designed to ensure diversity in racial, ethnic, and special student populations. Recruitment materials are printed in multiple languages to accommodate the linguistic diversity of the community, and partnerships are formed with local organizations that serve diverse populations. A key focus of RSA’s recruitment is on person-to-person engagement, including holding focus groups with parents and community organizations, cultivating relationships with local community members, and employing staff from the local area to lead recruitment efforts.

While the plan includes outreach strategies such as distributing promotional materials, conducting community events at various times, and using data-driven research to inform recruitment efforts, it is a generic template used across Rocketship schools. Staff previously noted that there are no specific strategies targeting the unique needs of RSA as a specific countywide charter school. The plan does not specifically set forth localized, targeted recruitment efforts tailored to the demographics and specific challenges of the county in which RSA is located. In its RSSP response, RPS explained that it disagrees because the actions specify that they relate to the “local community” (the phrase used in the Renewal Petition is “community”) and indicated that as each charter is specific to a school, it follows that the reference specifically means that charter school’s community and that the plan is meant to be highly localized to the specific school. Staff appreciates this clarification, and notes that for RSA as a countywide charter school, the focus of this charter element – thus the “RSA community” for these purposes – is the entire community within the County Board’s territorial jurisdiction.

Object 30: RSA Demographic Data from 2016-17 to 2023-24

	Total Number of Students	Hispanic or Latino %	Asian %	Filipino %	White %	African American %	Two or More Races %
2016-17	576	83.0%	7.5%	0.0%	0.0%	4.0%	0.0%
2017-18	513	86.4%	5.8%	0.6%	1.2%	4.7%	0.4%
2018-19	522	83.7%	5.4%	0.2%	2.9%	6.5%	0.2%
2019-20	509	86.1%	3.3%	0.2%	2.0%	6.3%	0.2%
2020-21	514	84.8%	2.9%	1.0%	2.1%	8.0%	0.2%
2021-22	516	83.5%	3.3%	1.4%	2.3%	8.7%	0.4%
2022-23	515	85.6%	2.7%	1.2%	2.1%	7.8%	0.4%
2023-24	526	86.1%	1.5%	1.1%	2.5%	8.0%	0.6%

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

Object 31: RSA Student Group Data from 2016-17 to 2023-24

	Total Number of Students	Percentage of SED	Percentage of EL	Percentage of SWD
2016-17	576	83.0%	53.5%	6.1%
2017-18	513	88.7%	48.1%	7.2%
2018-19	522	85.1%	39.8%	8.0%
2019-20	509	80.4%	53.8%	8.4%
2020-21	514	82.7%	55.6%	10.7%
2021-22	516	77.1%	59.7%	10.3%
2022-23	515	78.1%	59.8%	11.7%
2023-24	526	75.7%	61.4%	12.7%

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

Object 30, above, shows that RSA’s racial and ethnic demographic composition has remained stable from 2016-17 to 2023-24, with the Hispanic or Latino population consistently representing the majority of students. The Hispanic or Latino percentage has ranged from 83.0% to 86.4%, with the most recent year (2023-24) showing 86.1%. The Asian population has steadily declined from 7.5% in 2016-17 to 1.5% in 2023-24. Other racial groups, such as Filipino, White, and African American, remain low in representation, although the African American population has seen a slight increase, peaking at 8.7% in 2021-22 and maintaining 8.0% in 2023-24. The Two or More Races category has also remained small, never exceeding 0.6%.

Object 31, above, shows a steady rise in the EL population at RSA, increasing from 53.5% in 2016-17 to 61.4% in 2023-24. Similarly, the SWD population has grown from 6.1% to 12.7% over the same period. The SED population has slightly decreased over the years, from a high of 88.7% in 2017-18 to 75.7% in 2023-24. This data reflects RSA's commitment to serving a high-need student population, particularly English Learners and students with disabilities. This aligns with Rocketship’s mission to provide equitable access to high-quality education, supporting transformative outcomes for students in low-income communities.

RSA needs to continue its work towards achieving the student balance provided for in this element of the Charter Schools Act, including efforts to increase recruitment and enrollment of students with disabilities, while continuing to implement its mission of catalyzing transformative change in low-income communities. This includes through revisions as necessary to its recruitment plans to make them more specific to the particular circumstances of RSA and the county community.

The Charter specifies that RSA will “analyze the success and/or weakness of its outreach initiatives” and “utilize the data from the programmatic audit to make any necessary revisions to the outreach initiatives in order to correct student population imbalances.” Consistent with SCCOE’s best practices and expectations for charter schools, and RSA’s explanation that the “plan is updated annually, based on contemporary information and data,” RSA’s commitment to conducting this analysis and update process at least annually taking account of the results of the most recent open enrollment process should be explicitly specified in the MOU/addendum.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description only if RSA commits through the MOU/addendum to the ongoing implementation, review, and revision of its plan to achieve the pupil balance provided for in the Charter Schools Act as described above.

I. Element Nine: Financial Audit

RSA states in the Renewal Petition that the audit will be conducted in accordance with *EC* Sections 47605.6(b)(5)(l) and 47605.6(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 Petition describes RSA financial audit procedures, which include how the independent auditor will be selected and retained, the qualifications the independent auditor needs to possess, the timing of the audit, how any deficiencies will be resolved, and how this will be communicated to the necessary outside parties. RSA has a finance committee that selects the independent auditor. CSD staff notes and appreciates that RSA incorporated additional provisions related to the audit procedures and SCCOE’s right to request or conduct an audit at any time from the 2017 MOU.

The Charter Schools Department Staff believes that this section includes a reasonably comprehensive description.

J. Element Ten: Student Suspension/Expulsion Procedures

RSA’s Renewal 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 25 to the Renewal Petition, which is attached and fully incorporated by reference into the Renewal Petition. As such, these are the causes for suspension and expulsion and the procedures to be followed by RSA and may not be substantively revised, except to comport with requirements of law or to track revisions to the causes and procedures applicable to non-charter California public schools, without a determination from the County Superintendent or designee whether the proposed revision(s) is a material revision to the Renewal Petition.

These policies and procedures are generally consistent with SCCOE’s usual practices and with the changes to this portion of the Charter Schools Act. However, there are some internal

inconsistencies and confusion in the procedures as described in the Handbook regarding the entity responsible for expulsion decisions and appeals. For example, there are some references to the Board making the decision, which has been delegated to the Academic Affairs Committee, and the discussion of appeal indicates that some expulsion decisions would inexplicably be made by a body other than the Academic Affairs Committee and also refers to the Executive Committee of the Board, which is not identified.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description, only if the above issues are clarified and corrected through the MOU/addendum process.

K. Element Eleven: *Employee Retirement Systems*

The RSA Renewal Petition states all certificated employees of RSA shall participate in the State Teachers Retirement System (STRS), and all other employees will participate in the federal social security system. The Renewal Petition also states that all full-time employees at RSA will be offered a 403(b) program with a 3% match from Rocketship Public Schools. Rocketship’s Human Resources team, in conjunction with the principal at RSA, ensures that appropriate arrangements for each employee have been made available.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description.

L. Element Twelve: *Dispute Resolution*

The Renewal Petition includes the dispute resolution language from the 2017 MOU, which is reasonably comprehensive, with the provisions regarding internal disputes that relate to violations of the Charter applying equally to violations of any MOU/addendum that is made a part of the Charter, including the 2017 MOU, 2024 MOU, and/or any MOU/addendum entered into pursuant to the SCCBOE’s action on the Renewal Petition. However, the provision entitled “Internal Disputes” as revised in the Renewal Petition is partly in conflict with the other provisions of this element. It incorrectly purports to require SCCOE to “refer all disputes not related to a possible violation of the charter or law to Rocketship,” which is inconsistent with the other language in this element and RSA cannot limit its chartering entity’s authority in this manner.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description with the correction through the MOU/addendum of the above-identified concern.

M. Element Thirteen: *Admissions Policies and Procedures*

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

With the changes to the Charter Schools Act since RSA’s most recent renewal, the actual policies and procedures for admission – including how RSA implements the admission preferences, conducts the admission public random drawing (lottery) procedures, adds students to the waitlist, and offers them admission from the waitlist – must also be included in the Renewal

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Petition. RSA has updated the Renewal Petition to include these items, though there are a few clarifications needed, as described below.

The Renewal Petition requests County Board approval of revised and additional admission preferences in cases in which there are more applicants than spaces at a particular grade level. RSA is seeking approval of the following preferences in the following order:

1. Siblings of students currently admitted to or attending RSA
2. Children of employees of RSA (not to exceed 10% of total enrollment)
3. Students who qualify for free or reduced price meals
4. Residents of Santa Clara County
5. Other California residents

The previously approved preferences that are currently in effect are:

- a. Siblings of currently enrolled students
- b. Children of employees of RSA (not to exceed 10% of total enrollment)
- c. Residents of Santa Clara County
- d. Other California Residents

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

Whether to approve any or all of the requested preferences, other than the preference for residents Santa Clara County, is within the discretion of the SCCBOE, per *EC* Section 47605.6(e)(2)(B). If the County Board does not approve all the preferences, RSA would be required to revise this provision of the Charter and its admission policies and procedures accordingly.

The Renewal Petition does not specify its reason(s) for seeking the revised preferences. However, in its response to the RSSP recommendations, RPS specified:

RSSP changed the admission preference for siblings to reflect state law, which changed since the last renewal; see Education Code Section 47605(e)(2)(B) [for a countywide charter, 47605.6(e)(2)(B)]. RSSP changed the preference for district residents simply to correctly identify the name of the district. Finally, the preference for students who qualify for free or reduced price meals was included with the intention of serving the most underserved student populations.

This explanation regarding the change to the sibling preference being revised “to reflect state law” is not accurate. The Charter Schools Act has always provided, and continues to provide, that the chartering authority must approve any voluntary/discretionary admissions preferences requested by the charter school. This provision of law has been modified to include additional requirements for the chartering authority’s approval of any such preferences, “including, but not limited to, siblings of pupils admitted or attending the charter school” Thus, the reference in the law to any sibling admissions preference is only by way of example of the types of preferences a particular charter school might seek to provide, but which is not mandatory for the charter school to request nor is the chartering authority required to grant such a preference. As such, the revision to provide admission preference to siblings of students who are admitted to RSA is a request for the SCCBOE to approve an additional preference, which is within the SCCBOE’s discretion.

Consistent with RPS’s explanation, above, the preference for students who qualify for free or reduced-price meals (FRPM) increases enrollment opportunities for historically underserved students, so CSD staff recommends approval of this preference.

RSA currently has as its first preference siblings of students who are currently enrolled at RSA. The Charter School is seeking to expand that preference to include not only students who are currently enrolled, but students whose siblings are admitted during the particular lottery. In other words, as currently authorized by SCCBOE, if a student who is attending RSA in 2024-25 has a sibling apply during the open enrollment process for admission for 2025-26, that student would be eligible for a sibling preference. As proposed in the Renewal Petition, that preference would continue to apply, but, additionally, if two siblings who do not attend RSA in 2024-25 both apply for admission for 2025-26, immediately upon one of those siblings receiving a place through the lottery, the other sibling would automatically be entitled to an admission preference even though neither of the siblings are current RSA students. The Renewal Petition does not, however, explain the specifics of how the admitted sibling preference would be implemented in practice, particularly if a sibling is drawn in the lottery after their sibling in a lower grade was placed on the waitlist rather than offered admission. The process for implementing the sibling preference – and ensuring that it is only a preference, not an exemption from the lottery, including if one sibling is admitted during the lottery and another sibling(s) is participating in the same lottery – must be clearly described in the MOU or an addendum thereto.

CSD staff recognizes the benefits of allowing families to enroll all of their children at the same school, so recommends that the SCCBOE approve the addition of the preference for siblings of students who are admitted to RSA.

The Renewal Petition specifies, “applications received after the application deadline will be held in abeyance for a subsequent lottery, if needed.” Clarification is needed regarding what occurs if a student applies after the open enrollment period when there is an open space(s) at the requested grade level.

The Renewal Petition also states that students “may also apply to RSSP after the open application period.” CSD acknowledges that this is likely a typographical error; however, the MOU should be updated to affirm that all conditions, affirmations, and descriptions in the petition are intended to exclusively pertain to Rocketship Alma Academy (RSA).

The Charter Schools Department Staff recommends that the SCCBOE approve the preferences as proposed by RSA. The Charter Schools Department Staff believes this section includes a reasonably comprehensive description only if, through the MOU and/or an addendum thereto, the public random drawing procedures are clarified, as described above.

N. Element Fourteen: Public School Attendance Alternatives

Santa Clara County resident students who choose not to attend RSA may attend other school district schools. The Renewal Petition says such students may also “pursue an intra- or inter-district transfer in accordance with existing County enrollment and transfer policies.” However, students who reside within Santa Clara County are generally subject to the attendance requirements and intra- or inter-district transfer policy requirements of their district of residence, not to SCCOE policies. Thus, this explanation must be corrected through the

MOU/addendum. Parents and guardians of each student enrolled in RSA will be informed their students have no right to admission to a particular school of any local education agency as a consequence of enrollment in RSA, except to the extent such a right is extended by the local education agency.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description with the corrections identified about through the MOU/addendum.

O. Element Fifteen: 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

RSA states in this element that no employees of the county office of education are required to work at the charter school. The discussion in this element provides that such employees have no automatic rights of return and only such rights as the county office of education may choose to provide, and that employment at Rocketship does not provide any rights of employment at any other entity, including in the case of closure of Rocketship.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description.

P. Element Sixteen: Closure Protocol

RSA outlines a process to be used if the charter school closes and CSD staff notes and appreciates that RSA incorporated directly into the Renewal Petition the closure protocol language from the 2017 MOU. (In doing so, RSA inadvertently included a few clerical errors that can be addressed through technical corrections in the MOU/addendum.)

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description.

Required Supplemental Information

CSD Staff reviewed the RSA Renewal Petition, which includes the budget narrative, projected budget, and cash flow for Fiscal Years (FY) 2024-25 through 2028-29. CSD Staff also reviewed supplemental documents and the public hearing information to assess and provide clarification on RSA'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 Petition for accuracy.

Enrollment & Average Daily Attendance (ADA)

Object 32, below, provides RSA's historical and projected enrollment and Average Daily Attendance (ADA) data. The historical enrollment data indicates RSA experienced minor fluctuations in overall enrollment between 2016-17 and 2022-23, with a notable decline in 2017-18 by 24 students (-4%) and 2019-20 by 13 students (-2%). However, enrollment showed a positive trend in 2023-24, increasing by 11 students, resulting in a total enrollment of 526 students.

RSA Charter School

Similarly, RSA’s ADA has followed the enrollment trends. ADA decreased slightly from 501.62 in 2016-17 to 460.44 in 2022-23. The largest drop occurred between 2020-21 (487.60) and 2021-22 (466.67), a decline of 20.93 ADA. Despite these declines, a slight recovery is evident in 2023-24, with ADA increased to 491.12. The ADA percentage, which measures the proportion of enrolled students attending daily, historically stayed consistent with slight variations, reaching a high of 95% in both 2017-18 and 2020-21. Over the years, RSA’s average ADA percentage was 93%.

Furthermore, Object 33 shows that RSA's Renewal Petition projects an enrollment increase from 526 in FY 2023-24 to 550 students in FY 2024-25, representing an increase of 24 students (+5%), with enrollment stabilizing at 550 students from 2024-25 onwards. RSA's conservative budget projects no further enrollment growth beyond this initial 5% increase, as demonstrated in Object 33. To address potential attrition, RSA intends to continuously fill vacated spots to maintain stable enrollment levels.

Overall, RSA’s enrollment and ADA projections in the Renewal Petition appear reasonable and are consistent with its historical enrollment trends.

Object 32: RSA Historical and Projected Enrollment and ADA ¹													
	Historical Data								Enrollment Projection				
	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29
Grades TK - 3	346	341	385	394	382	375	380	371	400	400	400	400	400
Grades 4-6	191	172	137	115	132	141	135	155	150	150	150	150	150
Grades 7-8	0	0	0	0	0	0	0	0	0	0	0	0	0
[A] Actual Enrollment	537	513	522	509	514	516	515	526					
[B] Projected Enrollment									550	550	550	550	550
[C] Year-Over-Year (YOY) Enrollment Change ²	(25)	(24)	9	(13)	5	2	(1)	11	24	0	0	0	0
[D] YOY Enrollment Change (%) ³	-4%	-4%	2%	-2%	1%	0%	0%	2%	5%	0%	0%	0%	0%
[E] YOY Enrollment Growth/Decline Rate ⁴		0%	6%	-4%	3%	-1%	-1%	2%	2%	-5%	0%	0%	0%
[F] ADA	501.62	489.38	484.48	475.25	487.60	466.67	460.44	491.12	511.50	511.50	511.50	511.50	511.50
[G] ADA % ⁵	93%	95%	93%	93%	95%	90%	89%	93%	93%	93%	93%	93%	93%

¹ Historical enrollment data is based on Census Day enrollment and historical ADA is based on Annual ADA.

FY 2023-24 ADA data is based on P-2. FY 2024-25 through 2028-29 is based on Renewal Petition Updated Projections.

² Current Year Enrollment minus Prior Year Enrollment

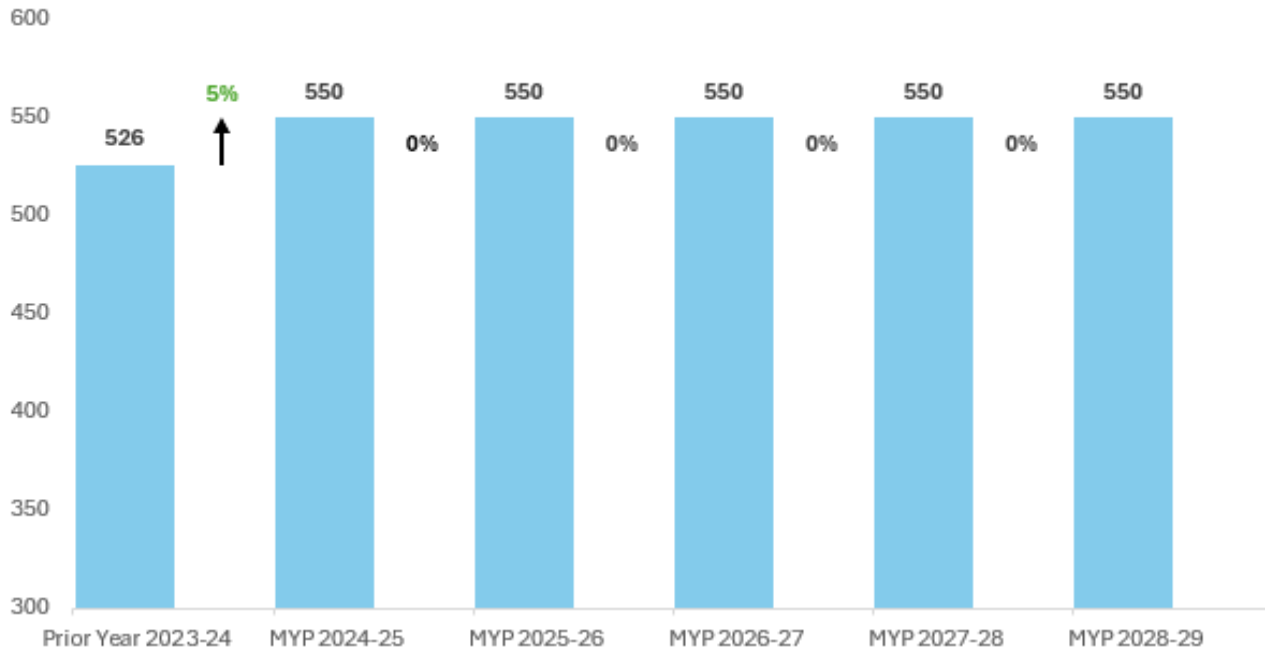
³ Row C/Prior Year Enrollment

⁴ Current Year Enrollment % Change - Prior Year Enrollment % Change (Row D)

⁵ Row F/Row A or Row B

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Object 33: RSA Renewal Petition Enrollment Projections



Revenues & Expenses

Object 34, below, presents financial projections for RSA over the next five fiscal years (FY 2024-25 through 2028-29). During this period, RSA anticipates generating a positive net income each year, starting with a projected net increase of \$26,013 in 2024-25 and gradually increasing to \$279,653 by 2028-29. This consistent growth will contribute to a steady increase in RSA's net assets.

RSA projects to maintain an average reserve percentage of 40% throughout its renewal term, which aligns with its historical average of 34%. During the Charter Renewal focus group meetings, the RPS team emphasized that these reserve projections are intended to serve as a financial buffer against unforeseen expenses or revenue shortfalls. This will also ensure that RSA can meet its financial obligations and comply with bond covenants, which require positive operating net income each year.

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RSA Charter School

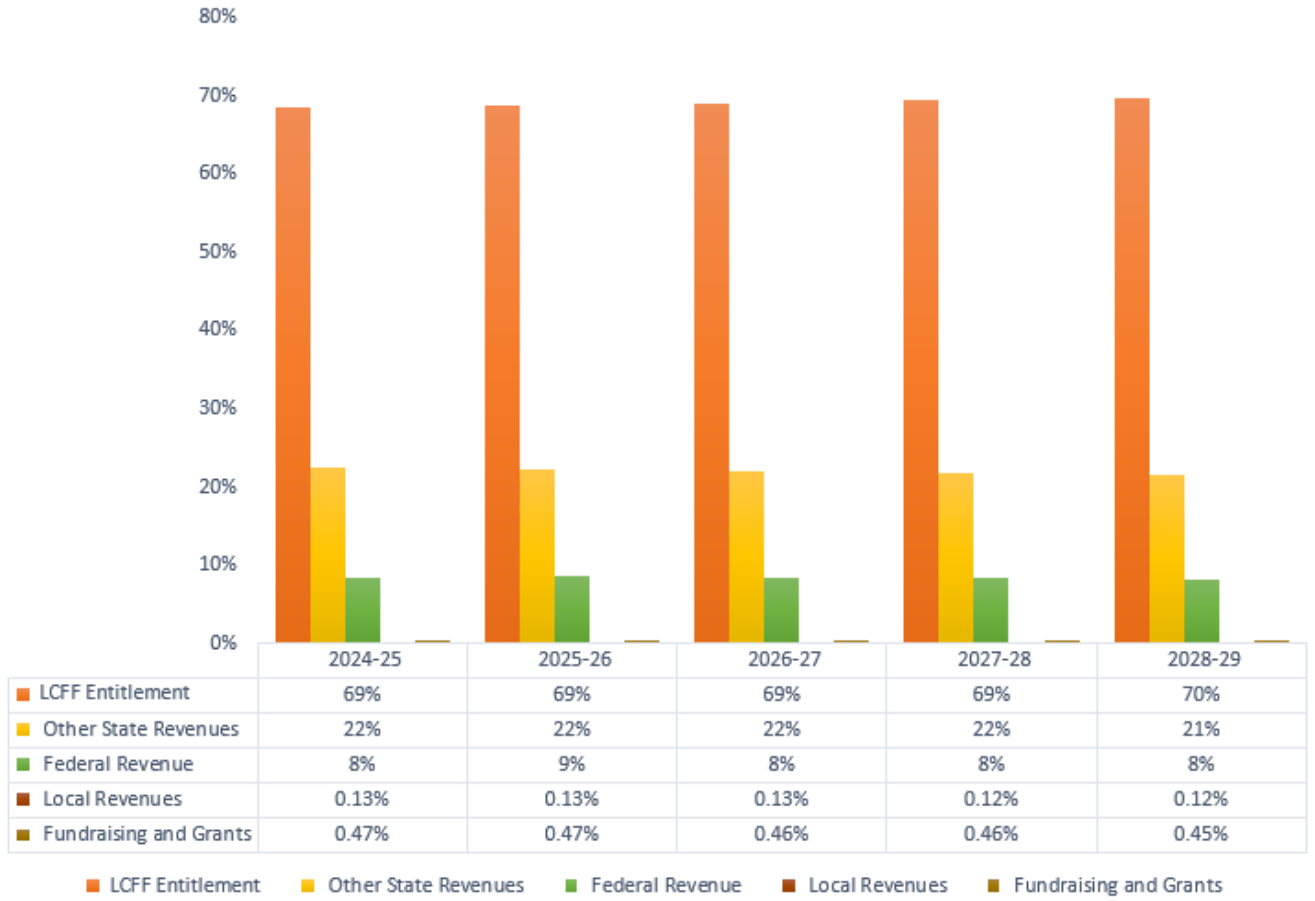
		Object 34: RSA Renewal Petition Multi-Year Projection Summary¹				
		2024-25	2025-26	2026-27	2027-28	2028-29
[A]	Total Revenues	9,306,162	9,415,311	9,512,402	9,610,949	9,710,974
[B]	Total Expenses	9,280,149	9,315,398	9,353,650	9,392,290	9,431,322
[C] = [A - B]	Net Income (Loss)	26,013	99,913	158,751	218,659	279,653
[D]	Beginning Fund Balance	3,407,792	3,433,805	3,533,718	3,692,469	3,911,128
[E]	Adj. to Beg. Fund Balance					
[F] = [(D+E) + C]	Total Net Assets, End of Year	\$3,433,805	\$3,533,718	\$3,692,469	\$3,911,128	\$4,190,781
[G] = [F/B]	Reserve Percentage	37%	38%	39%	42%	44%

¹Source: Renewal Petition Revenue & Expense projections.

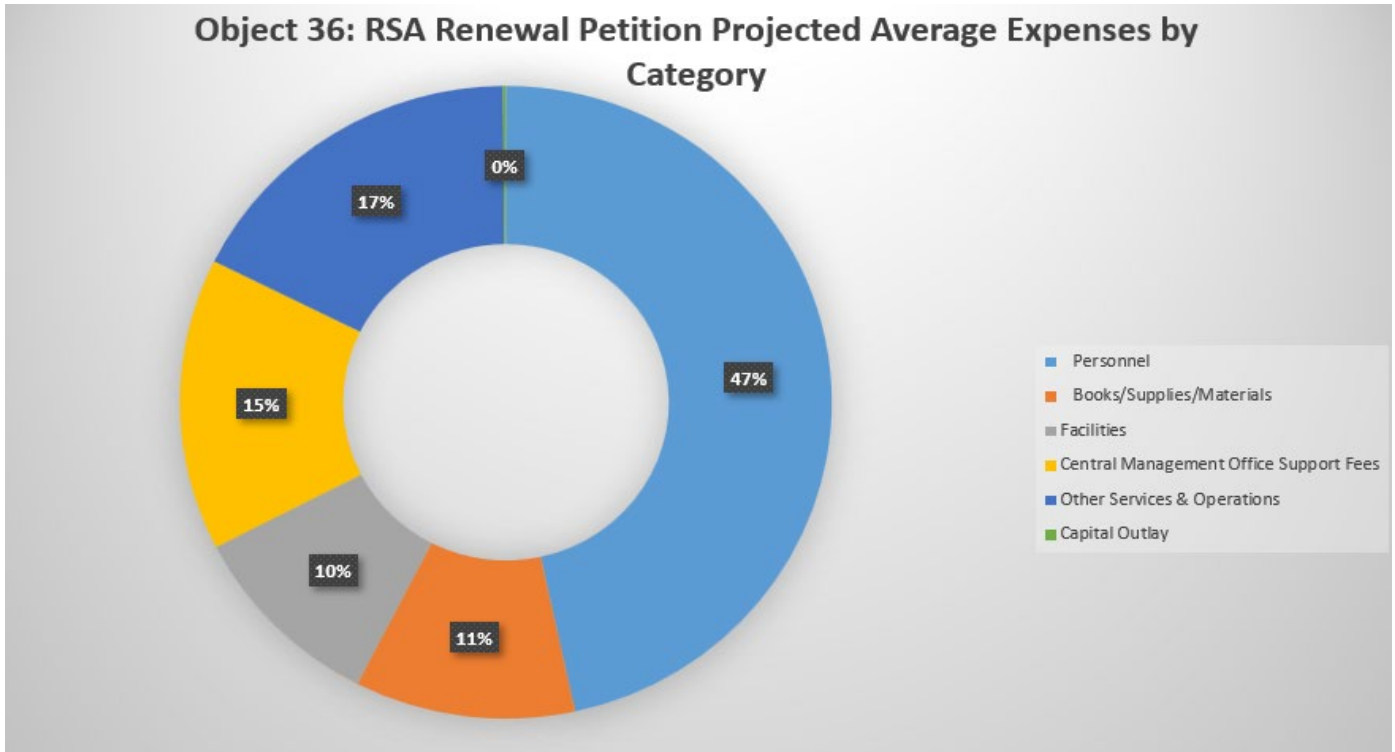
Object 35, below, shows the RSA Renewal Petition projected revenues by category, with primary funding anticipated from state and federal sources. RSA has taken a conservative approach by excluding one-time funding from budget revenues. The Local Control Funding Formula (LCFF) remains the largest revenue source. RSA projects an average of 69% of total revenue from LCFF entitlement, 22% from other state funding, and approximately 8% from federal revenue sources.

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Object 35: RSA Renewal Petition Projected Revenues by Category



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Object 36, above, exhibits RSA's projected average expenditure distribution over the next five years. RSA is projecting an average of 47% of the projected average expenditures in personnel costs; the remaining 53% include, but are not limited to, expenses for Central Management Office (CMO) Support fees, facilities fees, materials and supplies, and other services and operations. Specifically, 15% of average expenditures account for CMO support fees, 10% for facilities fees, 17% for other services & operations, and 11% for books, supplies, and other materials of total expenditures. These projections are consistent with RSA's historical expenditure patterns and appear reasonable based on past data.

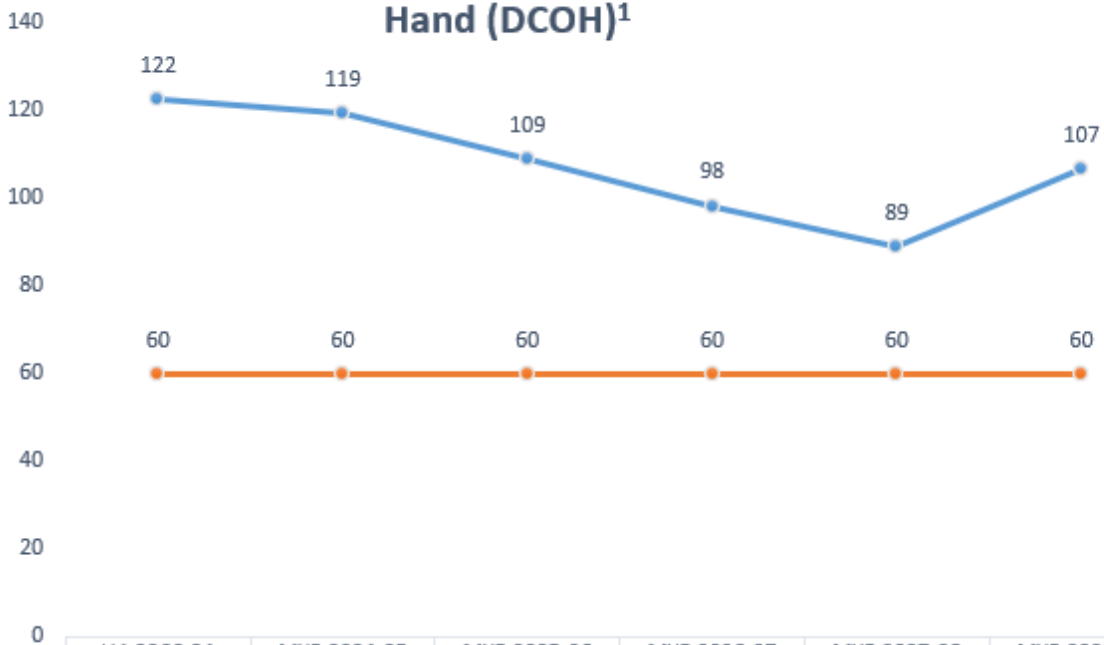
The SCCOE Staff finds that the multi-year budget projections presented in the Charter Renewal Petition include a reasonably comprehensive description of anticipated revenue and expenses and satisfactorily demonstrate RSA's ability to meet its financial obligations.

Cash Flow

During the staff review and analysis of RSA's Cash Flow Projections in the Multi-Year Projection (MYP) included in the renewal petition, it was noted that the beginning cash balance for July 2024, reported as \$2,387,000, was \$905,383 lower than the ending cash balance of \$3,292,383 reported in RSA's Unaudited Actuals for FY 2023-24, submitted on September 15, 2024. The \$2,387,000 beginning cash balance used in the renewal petition Cash flow projections was a preliminary cash balance for June 2024, prior to the fiscal year-end adjustments. Due to the FY 2023-24 (prior year) ending cash adjustment, cash flow projections in the renewal petition for all subsequent years were understated. To present more current data, staff recalculated the cash flow projections for the RSA renewal petition by inputting the updated beginning cash balance. Based on the current forecast, it appears that RSA can maintain a positive ending cash balance and sufficient cash reserves to meet all its financial obligations for the renewal term.

Object 37 below reflects RSA’s Days of Cash on Hand (DCOH) after adjustment to the July 2024 beginning balance. RSA’s DCOH is projected to exceed the best practice and SCCOE’s expectation benchmark of 60 days. However, RSA’s DCOH projections steadily decline from 122 days in FY 2023-24 to 89 days in FY 2027-28 before increasing to 107 days in FY 2028-29. As reflected in Object 38, historically, RSA’s DCOH has fluctuated between 88 days (FY 2018-19) and 44 days (FY 2021-22). Notably, RSA fell below the ideal threshold of 60 days in FY 2021-22 (44 days) and FY 2022-23 (55 days). Despite these fluctuations, RSA has maintained an average of 63 days of cash on hand. For the renewal term, the Renewal Petition projects an average DCOH of 108 days, which is above the required 60-day benchmark. The SCCOE staff recommends that RSA commit to maintaining and monitoring its cash reserves to consistently meet the best practice and SCCOE’s expectation of 60 days of cash on hand.

Object 37: RSA Renewal Petition (Adjusted) Days of Cash on Hand (DCOH)¹



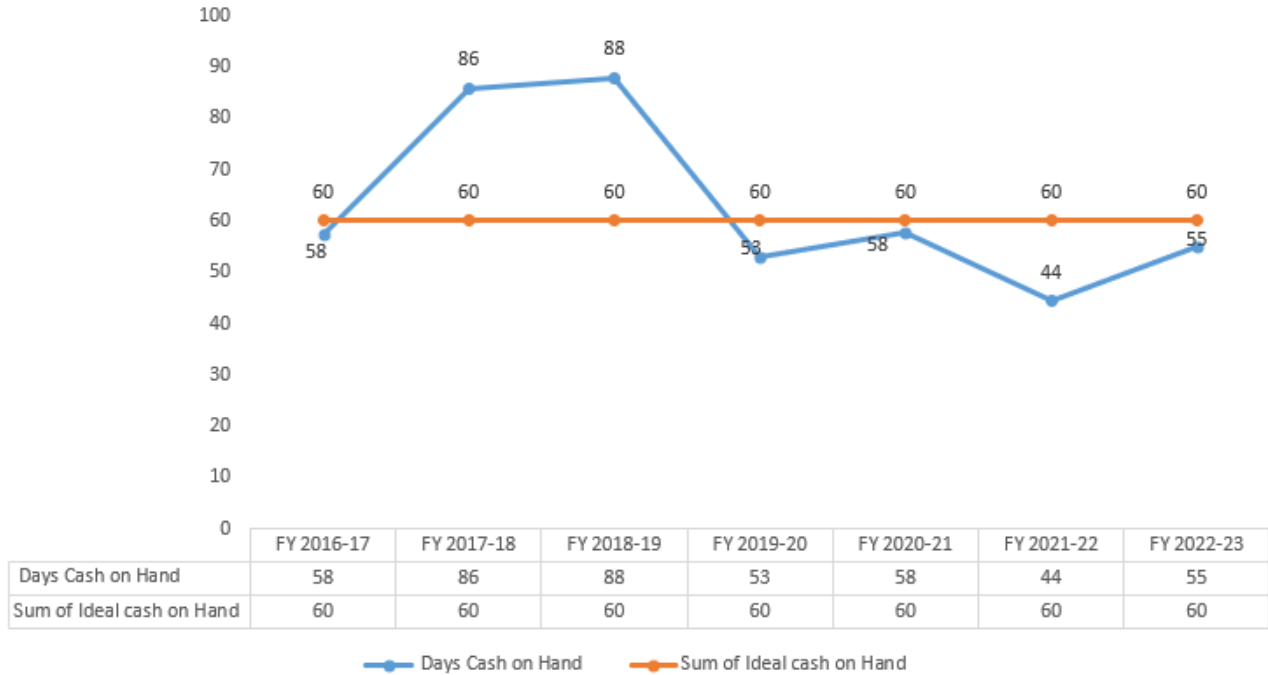
	UA 2023-24	MYP 2024-25	MYP 2025-26	MYP 2026-27	MYP 2027-28	MYP 2028-29
Days Cash on Hand	122	119	109	98	89	107
cash on Hand	60	60	60	60	60	60

— Days Cash on Hand — cash on Hand

¹Days of Cash On Hand: Cash and Cash Equivalents/ ((Total Expenditures-Depreciation)/365)

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Object 38: RSA Historical Days of Cash on Hand¹



¹Days of Cash On Hand: Cash and Cash Equivalents/ (Total Expenditures-Depreciation)/365

Potential Civil Liability Effects on the School and County Office

RSA is in compliance with its current MOU, including the insurance and indemnification, defense, and hold harmless provisions. This 2017 MOU will remain in effect unless and until a new MOU or addendum to the MOU replacing it in whole or part is entered into, which will address any new provisions as required by SCCOE’s risk management team. There is no reason to believe RSA will not continue to abide by SCCOE’s requirements and the agreed upon MOU and any addendum thereto. Staff recommends that the County Board require, as it is necessary for the sound operation of RSA as a countywide charter school, that RSA agree to comply with insurance, indemnification, defense, and hold harmless provisions as satisfactory to SCCOE’s risk management team, in its discretion.

5. Exclusive Public Employer

As required by the Charter Schools Act, the Charter specifies Rocketship Education doing business as Rocketship Public Schools 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

RSA currently serves TK-5. It is located within the boundaries of the SJUSD in a facility built for RSA’s specific needs, and RSA plans to remain at that location throughout the renewal term. RSA is located at 198 West Alma Avenue, San Jose, CA 95110.

RSA Charter School

The Charter Schools Department Staff found RSA is able to meet the requirements for grade levels served, facility location, and students served.

7. Any Other Criteria Set Forth in the Statute

Since RSA'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. RSA will need to comply with the changes to the law.

CONCLUSION

The Charter Schools Department Staff reviewed RSA's Renewal Petition, Dashboard performance, and verified data of measurable increases in academic achievement, consistent with RSA being designated as a middle performing school, utilizing the criteria for charter renewal set forth in *EC Sections 47605.6, 47607, and 47607.2*.

The SCCOE Staff recommends the SCCBOE conditionally approve the request for renewal of the Charter for a term of five years (July 1, 2025-June 30, 2030) on the condition and with the requirement imposed pursuant to *EC 47605.6(b)* necessary for the sound operation of RSA as a countywide charter school, that Rocketship Alma Academy Charter School, Rocketship Education doing business as Rocketship Public Schools, and SCCOE enter into an MOU and/or an addendum to an MOU on or before February 18, 2025, or such later deadline as may be agreed to by the County Superintendent or designee, that addresses to SCCOE's satisfaction each of Staff's concerns, including but not limited to those identified and reviewed in this Staff Analysis, whether or not specifically recommended as conditions and requirements for renewal, and as necessary to update and/or replace the terms of the 2017 MOU to be consistent with current law and/or SCCOE best practices and expectations, as well as any additional conditions or requirements identified by the SCCBOE, with the terms of such MOU/addendum to be to SCCOE's satisfaction, as consistent and necessary to RSA's sound operation as a countywide charter school.

Staff also recommends the SCCBOE deny the material revisions to the Renewal Petition seeking to remove the teaching credential requirement for the Principal and Assistant Principal positions.

Staff further recommends that the SCCBOE effectuate these actions by adopting the proposed resolution entitled: Board Resolution Conditionally Approving for a term of July 1, 2025, through June 30, 2030, the Charter Renewal for RSA Charter School with the Addition of Requirements Pursuant to Education Code Section 47605.6(b), and, Alternatively, Making Written Factual Findings Supporting Denial & Denying the RSA Charter School Charter Renewal if the Requirements and Conditions Are Not Met, and Separately Denying the Request for Material Revisions and Adopting Written Factual Findings of Denial.

Student Impact

The Charter School Department provides oversight and monitoring for 21 County Board of Education authorized charter schools. RSA was authorized in 2011 and currently serves approximately 540 students.