SCUSD CONCERNS	SASV RESPONSE
[Note: All concerns are copied directly from the District's analysis. All items identified by the District are included.]	
A. Petitioners are demonstrably unlikely to successfully implement the proposed program. (Ed. Code, § 47605(b)(2).)	The answers provided by the petitioners clearly show that the district staff fails to prove how and why the petitioners are 'unlikely to successfully implement the proposed program'. The district fails to understand the petition, is misrepresenting the petition by selectively quoting out of context, and is ignoring explanations, documentation, and assurances provided in the petition. Moreover, the district ignores the fact that the petitioners are experienced school administrators, faculty and staff that have been successfully operating charter schools for years.
1. Lack of Realistic and Sound Financial and Operating Plan	The petitioner's financial and operational plans are based on currently operational and successful charter models.
REVENUE	
Lack of Supporting Documentation:	
The assumptions on the Budget are minimal and make it extremely difficult to analyze the information. A typical budget/multi-year projection includes much more extensive supporting documentation and descriptions of the notes and assumptions that were relied upon to create the projections. Here, SASC [*sic*] has provided a brief "Explanation" page which appears to merely be a simple recap of information, without any meaningful documentation.	California Education Code Section 47605 requires a charter school petition to contain only "a proposed first-year operational budget, including startup costs, and cashflow and financial projections for the first three years of operation." SASV has included three-year budget and cash flow projections as well as a plan for start-up costs in its petition. The District never requested any greater detail than what is required by Ed Code, nor have they provided any guidelines and/or expectations for additional documentation. The Petitioners have a strong track record of successful charter school operations, including budget management.
State Aid:	

State apportionment revenue based on student attendance represents a material portion of total revenues. While the Budget model identifies grade levels and a projected average daily attendance of 556, it does not provide the amount per pupil used to calculate State Aid or Property Taxes. Therefore, there is no method to verify the revenue assumptions for State Aid, Education Protection Account (EPA) or In lieu Property Tax other than simply dividing the revenue number listed by the ADA. While this may result in a mathematical calculation, no information is listed for comparison.	SASV has used FCMAT's budget calculator for ADA calculations as a standard practice. The Petitioners have provided a budget and cash flow projections, which are easily understandable for anyone with experience with charter school budgets. The Petitioners have a strong track record of successful charter school operations, including budget management.
Further, it is assumed SASV would be funded by the State LCFF. However, there is no mention of the LCFF calculation, nor is there any mention of having used the LCFF model calculator which is used by school districts and charter schools throughout the State.	SASV has included three-year budget and cash flow projections as well as a plan for start-up costs in its petition. The district staff states that "the LCFF model calculator is used by school districts and charter schools throughout the State" and wants the petitioners to state the obvious. The FCMAT calculator includes LCFF calculations. The Petitioners have a strong track record of successful charter school operations, including budget management.
In addition . . . the per pupil revenue based upon a projection of 556 students is not supported by adequate detail as to how the charter school will achieve its projected enrollment. For example, attendance rate is an area that significantly affects the revenues and expenditures of charter schools. Detailed budget notes that clearly describe assumptions on revenue estimates, including, but not limited to, the basis for average daily attendance estimates and staffing levels as required by Title 5 of the California Code of Regulations, section 11967.5.1 (c)(3)(B) were not presented within the SASV's budget notes or budget assumptions that would support the charter school's anticipated enrollment.	California Code 11967.6 covers "review and approval of charter school petitions by the State Board of Education" and is not applicable to the district's review. The budget does cover enrollment projections and ADA estimates. The charter petition explains the recruitment process. The petitioners have submitted over 250 signatures for the charter and over 400 signatures for a Prop 39 request. These signatures provide sufficient evidence to support the targeted enrollment numbers. The Petitioners have a strong track record of successful charter school operations, including enrollment and budget management.
Federal Funding:	

The Budget model provides no information on how Federal or Other State Revenue funding is calculated. Therefore, there is no method to determine the accuracy or reasonableness of this projected revenue.	Not a required element and therefore not applicable. The budget, however, covers Federal and other State revenue estimates based on Magnolia's current revenues. The Petitioners have a strong track record of successful charter school operations, including budget management.
Other Local Funding:	
A total of $100,000 is listed as Revenue from "Fundraiser/Donations". However, once again, o [*sic*] information is provided to indicate how this revenue will actually be generated. Moreover, this line item comprises a significant portion of the proposed start-up revenue. However, donations and fundraising amounts are speculative at best. The timing of receipt of revenues is a critical factor for educational organizations. Management of cash flow is extremely critical for the charter school. There is no indication in the Budget or Petition that these funds are in-hand and available for immediate use upon opening the proposed school.	Not a required element and therefore not applicable. Together with the budget and cashflow statements, however, a statement explaining fundraising and loans for startup costs has been submitted. The petition states that the majority of the petitioners are current Magnolia Science Academy parents and staff. Magnolia parents have historically raised over $100,000 a year and therefore the numbers provided are not speculative but based on documented facts. The funds do not have to be in-hand at the time of the submission of the petition; the petition provides for a plan. The Petitioners have a strong track record of successful charter school operations, including budget management.
EXPENDITURES	
Salaries and Employee Benefits:	
34 full-time employees (FTE) are listed for Certificated FTE's. However, no breakdown is provided concerning how many of these FTE's are teachers, administrators or support personnel. Using the estimated enrollment divided by 34 FTE's results in an enrollment to FTE ratio of 17.21. There is simply inadequate information to determine whether the proposed FTE budget is sufficient to support the educational program.	This level of detail is not required in a charter petition. The budget states that there are 34 certified FTE and 3 classified FTE. The petition explains the number of administrators and their job descriptions. The projected amounts are reasonable based on comparisons with other local charter schools. The Petitioners have a strong track record of successful charter school operations,

	including budget management.
The total Certificated Salary budget of $1,878,875 divided by 34 FTE's results in an average salary of $55,261. However, no salary schedule, or scatter-gram, is provided to verify the accuracy of this Budget.	This level of detail is not required in a charter petition. The projected amounts are reasonable based on comparisons with other local charter schools. The Petitioners have a strong track record of successful charter school operations, including budget management.
3 FTE's are listed for Classified FTE's. Again, there is no breakdown provided concerning how many FTE's are in which classified position(s).	This level of detail is not required in a charter petition. The projected staffing is reasonable based on comparisons with other local charter schools. The Petitioners have a strong track record of successful charter school operations, including budget management.
The total Classified Salary budget of $158,100 divided by 3 FTE's results in an average salary of $52,700. Again, there is no salary schedule, or scatter-gram provided to verify the accuracy of this budget.	This level of detail is not required in a charter petition. The projected amounts are reasonable based on comparisons with other local charter schools. The Petitioners have a strong track record of successful charter school operations, including budget management.
While the common categories of Employee Benefits are listed on the Budget model, there are no percentages or rates provided. In addition, there is no indication as to how the percentages/rates were applied to the various categories of FTE's – teachers, administrator, classified, etc.	This level of detail is not required in a charter petition. The budget provides for reasonable expenses for employee benefits. The projected staffing is reasonable based on comparisons with other local charter schools. The Petitioners have a strong track record of successful charter school operations, including budget management.

The Health and Welfare Benefits budget totals $240,500. However, there is no plan or rate information provided. Therefore, there is no method to determine the reasonableness of this amount.	This level of detail is not required in a charter petition. The projected amounts are reasonable based on comparisons with other local charter schools. The Petitioners have a strong track record of successful charter school operations, including budget management.
Based on Title 5 of the California Code of Regulations, section 11967.5.1(c)(3)(B), the Budget notes and assumptions wholly fails describe assumptions for anticipated costs of employee salaries or benefits.	The code referred to applies to the state board of education and does not apply. The Petitioners have a strong track record of successful charter school operations, including budget management.
Books and Supplies:	
The Books and Supplies budget totals $347,015 for year 1 and decreases substantially in years 2 and 3. This year 1 allocation equates to approximately $593 per student based on the stated enrollment of 585. However, no detail is provided to determine how this budget was derived. The type and number of textbooks and reference materials to be purchased is not defined. No budget notes or assumptions are written within the charter Petition to support, define and substantiate the expenditures for books and supplies. The allocated funds also appear inadequate particularly in light of the student population to be served, including grades 6-12 which require substantially higher textbook expenditures.	This level of detail is not required in a charter petition. The projected amounts are reasonable based on comparisons with other local charter schools. Moreover, the move to online textbooks and curriculum by such providers as Edmentum, Redbird Learning, and CK-12 has greatly reduced the cost of providing student instructional materials for schools and districts that have the flexibility to utilize new and innovative approaches to instructional materials. The Petitioners have a strong track record of successful charter school operations, including budget management.
Nor does the Budget identify the types of equipment the charter school intends to purchase, and whether that equipment meets the demands of the proposed educational program.	This level of detail is not required in a charter petition. The projected amounts are reasonable based on comparisons with other local charter schools. Moreover, the petitioners have applied for Prop 39 facilities from SCUSD.

	According to Prop. 39 school districts must provide charter school students with facilities that are "reasonably equivalent" to those used by non-charter students within the district, and those facilities must be "similarly furnished and equipped." Thus, the District will be responsible for providing furniture and equipment for SASV at the same standard furniture and equipment is provided to District schools. The Petitioners have a strong track record of successful charter school operations, including budget and facilities management.
Without detailed supporting documentation identifying the costs associated with Books and Supplies, this analysis cannot determine if the estimated cost for books and supplies is reasonable.	This level of detail is not required in a charter petition. The projected amounts are reasonable based on comparisons with other local charter schools. The Petitioners have a strong track record of successful charter school operations, including budget management.
Services and Other Operating Expenditures:	
The Services & Other Operating Expenses budget totals $689,165. This equates to approximately $1,178 per student based on the stated enrollment of 585. However, no detail is provided to determine how this budget was derived and therefore there is no method to determine its reasonableness. In addition, no information was provided related to Insurance or Utilities budgeted amounts.	The submitted budget actually breaks down Services & Operating expenses to 7 parts, including Insurance, Operations & Housekeeping, Leases, Professional and Consulting Services, etc. with separate amounts for each area. The projected amounts are reasonable based on comparisons with other local charter schools. The Petitioners have a strong track record of successful charter school operations, including budget management.
The Petition does not provide a description of the manner for providing for administrative services and does not provide any criteria or process for selection of contractors. The	The referenced code applies to charter petitions reviewed by the state board of education, not review by the District.

charter Petition and supporting documents do not adequately comply with Title 5 of the California Code of Regulations, section 11967.5.1(c)(3)(A) and therefore present an unrealistic financial and operational plan.	The petition, however, addresses the mentioned administrative services under the Plan for Operations on pages 148-149. The Petitioners have a strong track record of successful charter school operations, including budget management.
B. The Petition fails to set forth reasonably comprehensive descriptions of many charter elements. (Ed. Code, § 47605(b)(5).)	All charter elements are explained in detail as required by Ed code.
1. Element 1 – Educational Program	
a. Community Need for Charter Schools	
The Petition quotes the governor's statement from 2005 ". . . increase the number of STEM graduates at all levels, especially among Hispanics ...". However, the Petition fails to state how it will achieve this goal.	The District's statement fails to understand the overall scope of SASV's program. The educational program for the school emphasizes additional coursework and opportunities for science, technology, engineering, and math. All graduates of the school will be STEM graduates. The Petitioners have a strong track record of running successful charter school educational programs with a STEM focus.
The Petition indicates SASV advanced programs in math, Engineering, Electives & Clubs are for high achieving students only and fails to explain how low achieving students can benefit or have the opportunity to participate in these programs.	The district statement is incorrect and fails to understand the overall scope of SASV's program. The educational program for the school sets high expectations for all students. Students at all levels will have expanded educational opportunities. The Petitioners have a strong track record of running successful charter school educational programs that set high expectations for and achieve strong academic performance from all students.
Many of the courses mentioned in the Petition are offered in District and other local charter school (sic). The Petition fails to describe how the SAVC courses differ from what is already offered to District students.	The district statement fails to understand the overall scope of SASV's program. While some courses may be the same as those offered at other schools, the overall educational program is not available to district students at district schools.

	The Petitioners have a strong track record of running successful charter school educational programs with a STEM focus.
The Petition fails to adequately describe SASV's comprehensive – multi faceted education for minority and socio-economically disadvantaged population.	SASV presents a comprehensive and multi-faceted educational program. On pages 28-37 of the petition, the petitioners explain the instructional design of the school, including services for socioeconomically disadvantaged student populations. The Petitioners have a strong track record of running successful charter school educational programs that meet the needs of all students, including both minority students and those who are socio-economically disadvantaged.
According to its website, Get Ready for Life (GRFL) and College Membership and Leadership Program (CMLP) are programs that belong to Magnolia Science Academy. The Petition fails to explain how SASV will be able to provide and use these programs. In addition, the Petition fails to identify the programs SASV will implement for the elementary level students?	The District's information is incorrect. Both Get Ready for Life and College Membership and Leadership Program are developed by the Accord Institute for Educational Research. Neither "belongs" to Magnolia Science Academy. Any school may purchase these programs, but they are not available at any district school. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
No comparison information is provided for the proposed elementary program. For example, the Petition includes a table for secondary schools in close proximity but there is no such table for elementary schools.	SASV presents a comprehensive and multi-facted K-12 educational program. The Elementary Curriculum and Materials are explained in the petition. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
b. Student Population Served	
The Petition indicates the proposed charter school will open with enrollment of 585	The district statement fails to understand the overall scope of SASV's program.

students. However, as discussed in greater depth below, the Petition heavily favors high-achieving students and therefore does not promote a program intended to support the enrollment of a student population that reflects the demographic diversity of the corresponding district community. For example, without explanation the Petition assumes that low income and socio-economically disadvantaged families are low achieving students. Moreover, according to the Petition, only two (2) programs will be offered to low-achieving students: "free after-school tutoring and home visit programs." However, the school will "appeal to high-achieving students" with eight (8) Advanced Studies Programs? There is no explanation in the Petition for the assumption that low-achieving students from low income and socio economically disadvantaged families will not qualifying to participate in the Advanced Studies Programs?	As described in the petition, the school is open to all interested students. As a public school, SASV cannot set admission requirements other than a preference for in-district students as a district charter. While the district appears to assume that "that low income and socio-economically disadvantaged families are low achieving students," the SASV petition make no such assumptions. It is unclear how the district came up with the idea that those eight programs are only meant for high-achieving students because the petition does not make any such assumptions. The District's arguments, therefore, are speculations without merit. A word search of the petition shows that *low-achieving students* are mentioned 23 times, and *socio-economically disadvantaged* occurs 19 times, while *high-achieving students* are mentioned only 4 times in the entire petition. Assessments to identify low-achieving students and programs for both low-achieving students and economically-disadvantaged students are explained in length in the petition. The educational program for the school sets high expectations for all students. Students at all levels will have expanded educational opportunities. Moreover, the District fails to acknowledge that many of its own schools and programs of choice do not reflect the "demographic diversity of the corresponding district community." The Petitioners have a strong track record of running successful charter school educational programs that meet the needs of all students, including both low-achieving students and those who are socio-economically disadvantaged.
c. Goals and Philosophy	
Bullet three of the Petition states there will be "a supportive and caring environment with	The District's statement fails to acknowledge the District's own class sizes.

small class sizes" but on page 14 of the Petition, last paragraph it states that there will be approximately 30 students per class. By state standards, 30 students per class does not constitute a small class size.	A class size of 30 for middle and high school is much smaller than average District middle and high school classes. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
The Blended Learning section states "...after enrollment all students are assessed for placement into the right program..." However the Petition does not describe the process used to assess each student or the types of programs referenced.	This level of detail is not required in a charter petition. The petition, however, does note on numerous occasions that NWEA's MAP tests and other forms of assessments will be used to assess students. Examples can be seen on pages 28, 29, 30, 46, 47, 75, 78, 81, and 98. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
The Petition states there will be three different tracks per grade level, but does not describe what the tracks consist of and how differentiations will be made.	This level of detail is not required in a charter petition. On pages 18 and 19 of the petition, however, the petitioners explain tracks and levels in detail. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
The Petition states that students will be divided into three groups in each classroom and that teachers will deliver instructions by group on a rotation model, requiring students to work 2/3 of their day independently on assignments, quizzes, and homework. Students will take pretests before chapters and units in order in order to be allowed to skip contents in order to progress faster. The Petition does not state how these students are grouped or how students obtain the instruction they need by only having instruction from a teacher 1/3 of their day. Moreover, the 1/3 of their day model for actual instruction by a teacher leaves open the question of how the needs of students in Special Education students and EL students	This level of detail is not required in a charter petition. Contrary to the District's speculations and assumptions, the petition **does not** state anywhere that students will work independently ⅔ of the day. The rotation model is commonly used in classrooms for different purposes, especially to meet the different needs of students and clearly the reviewer does not understand the practice. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.

who will require more individualized instruction will be met.	
The Petition does not identify who monitors the students when students are receiving online intervention programs.	The District's information is incorrect. On page 18 of the petition, the Petitioners clearly state that that students are monitored by an instructor. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
The Petition also fails to establish how students have access to elective classes, clubs, and fun courses if they are in intervention programs or how Gifted, Special Education, and EL students will be selected for teams and clubs.	This level of detail is not required in a charter petition. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
The Petition state [*sic*] that SASV is considering using PLATO as the online curriculum for all subject areas. However, only 9 courses are identified as written for Common Core. The Petition does not include a determination that PLATO meets the curricular requirements of Common Core.	This level of detail is not required in a charter petition. As a California public school, the educational program will be in compliance with required state standards, including Common Core standards. PLATO courses are common core aligned and A-G approved. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
The Petition does not include any information regarding the Petitioners ability to serve students in grades K-5.	The district's statement fails to recognize the K-5 program information included in the petition. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
The actions proposed to accomplish the goals for the Charter's LCAP are not specific in terms of desired results and how to measure them. The actions do not contain specific timelines for completion.	While the Petitioners have provided a proposed LCAP for the first year of school operations, the district's statement fails to understand that LCAP plans are REQUIRED by law to be made in consultation with all stakeholders at the school. It would be a violation of the LCAP process to specify desired results prior to the establishment of

	the school community. SASV will develop its desired results and action plans in consultation with its school community as required by law. Moreover, desired results cannot be defined until SASV has data from students and school operations. The desired results begin with the current level of the school and set targets for growth. A school that is not yet operational has no baseline from which to set targets. The Petitioners have a strong track record of running successful charter school educational programs, including developing legally compliant LCAPs.
There is no mention of NGSS, ELD or ISTE Standards. The STEM curriculum is not evident. For example, the Petition does not state how the STEM program into the curriculum across grade levels.	This level of detail is not required in a charter petition. As a California public school, the educational program will be in compliance with required state standards, including NGSS and ELD standards as adopted by the state. While the ISTE standards are excellent benchmarks for science and technology education, they are NOT state required standards, nor have any ISTE standards been adopted by the District. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
In Table 3 – Charter School annual Goals & Action to Achieve Annual Goals there are no goals or priorities for the Special Education students or their families.	This level of detail is not required in a charter petition. Moreover, the full LCAP cannot be adopted until the school is operational and input from all stakeholders is gathered. The Petitioners have a strong track record of running successful charter school educational programs, including providing services for Special Education students.
The LCAP Goals on pages 20-27 do not include metrics to evaluate their implementation as required by the CDE LCAP Template for public and Charter Schools.	This level of detail is not required in a charter petition. Moreover, the full LCAP cannot be adopted

	until the school is operational and input from all stakeholders is gathered. The Petitioners have a strong track record of running successful charter school educational programs, including using metrics to evaluate performance.
What is SASV's instructional support for EL students since the newly adopted ELD standards are not mentioned in the Petition. [*sic*]	As a California public school, the educational program will be in compliance with required state standards, including ELD standards. On pages 75-79 of the Petition, the Petitioners explain the EL program. The Petitioners have a strong track record of running successful charter school educational programs, including providing services for English Language Learners.
The Petition has no mention of a plan or strategies on how SASV will implement CCSS for academic content and establish local performance standards for the various subjects.	This level of detail is not required in a charter petition. As a California public school, however, the educational program will be in compliance with required state standards, including Common Core standards, and **the Petition DOES include plans for common core implementation**. The Petitioners have a strong track record of running successful charter school educational programs that meet or exceed state standards.
There is no mention of assessments for Science or History.	This level of detail is not required in a charter petition. As a California public school, SASV will comply with all required state assessments. School-level assessments will be developed by the staff. The Petitioners have a strong track record of running successful charter school educational programs that meet or exceed state standards.
The Petition does not state the criteria for classifying or reclassifying EL students in accordance to the State guidelines.	This level of detail is not required in a charter petition. As a California public school, SASV will administer the CELDT and will reclassify students based on State guidelines. EL

	assessments and reclassification are explained on page 78 of the Petition. The Petitioners have a strong track record of running successful charter school educational programs, including providing services for English Language Learners.
d. Instructional Design	
Blended learning is stated as "research-based, proven educational program, has been shaped by highly successful STEM focused charter schools." However, the Petition does not provide any examples of these schools on which SASV's blended learning approach will be modeled.	This level of detail is not required in a charter petition. The Petitioners have a strong track record of running successful charter school educational programs, including the implementation of blended learning initiatives.
The Petition is inconsistent as to differentiated learning. For example, this section of the Petition implies that differentiated instruction is insufficient in meeting the wide range of academic abilities in the classroom, yet in earlier text in the Petition describes a mode of differentiated instruction (3 groups).	The District's response indicates that the reviewer(s) failed to understand blended learning, and the comments are mere speculation. This level of detail is not required in a charter petition, and the District did not request additional and/or clarifying information from the Petitioners. The Petitioners have a strong track record of running successful charter school educational programs, including the implementation of blended learning initiatives.
Online learning appears to be presented as intervention or supplemental/enrichment, yet in a previous section in the Petition appeared to be part of the core teaching practice.	As the Petition makes clear, blended learning will be used for both core classes and enrichment. The Petitioners have a strong track record of running successful charter school educational programs, including the implementation of blended learning initiatives.
The Petition is not clear if teachers will be monitoring student placement in and out of "remedial support" and how does the online support "differentiate" for the individual needs of each student?	This level of detail is not required in a charter petition. In the Petition, however, the Petitioners explain that instructors will monitor student progress. The Petitioners have a strong track record of

	running successful charter school educational programs, including the implementation of blended learning initiatives.
The Petition does not clarify how Flexible Time and Learning Environment apply to benefit a student who doesn't have access to online programs while away from school.	This level of detail is not required in a charter petition. In the Petition, however, the Petitioners state that the online programs are accessible at home. The Petitioners have a strong track record of running successful charter school educational programs, including the implementation of blended learning initiatives.
The Petition does not state how data from the NWEA MAP assessment drive instruction in Engineering, Technology, and STEM more holistically.	This level of detail is not required in a charter petition. The Petitioners have a strong track record of running successful charter school educational programs, including using data to drive instruction.
The Petition does not state how students in targeted intervention classes are offered electives.	This level of detail is not required in a charter petition. The Petitioners have a strong track record of running successful charter school educational programs, including providing support for struggling students.
The Petition does not state how CAHSEE Prep classes for all 10th graders fit into their schedules and next steps if a student does not pass the exam.	This level of detail is not required in a charter petition. The Petitioners have a strong track record of running successful charter school educational programs, including ensuring that high school students meet or exceed state requirements.
The Petition states that "SASV teachers have visited students in their homes to enhance Learning" and "More than 150 visits to student homes have been conducted by the SASV staff in the first two years of the school. SASV staff uses an "Activity Module" in its school information system ..." Given that there are no students enrolled in SASV, it is unclear how SASV has accomplished this as it does not have a charter at this time.	While the District has identified a verb tense error in the petition, this statement is not applicable to the soundness of the educational program. The Petitioners should have stated: "More than 150 visits to student homes **will be** conducted by the SASV staff in the first two years of the school. SASV staff **will use**

	an "Activity Module" in its school information system ..." Moreover the petitioners are current Magnolia staff and parents who regularly conduct parent visits. The Petitioners have a strong track record of running successful charter school educational programs, including building strong connections between home and school.
SASV states that the AP classes that will be offered will be taught with college textbooks in which students will be taking college exams and give college credits. The Petition does not provide information regarding the Accreditation of SASV to teach these courses. Nor does the budget account for the costs of college textbooks.	This level of detail is not required in a charter petition. The projected amounts are reasonable based on comparisons with other local charter schools and the extensive experience of the petitioners. Moreover, the move to online textbooks and curriculum by such providers as Edmentum, Redbird Learning, and CK-12 has greatly reduced the cost of providing student instructional materials for schools and districts that have the flexibility to utilize new and innovative approaches to instructional materials. Students who take AP courses will be offered the opportunity to take AP exams. Students who successfully pass AP exams may be able to earn college credit depending on both their score and their college. Teaching AP courses does not require any special accreditation or credential. The Petitioners have a strong track record of running successful charter school educational programs, including providing AP classes and ensuring that all students can be successful in these courses.
Pg. 37 SASV list [*sic*] that students enrolled in their various Math courses fulfill the UC math course B Requirement but isn't this actually C Requirement?	While the District has identified a typographical error in the petition, this statement is not applicable to the soundness of the educational program. For courses from Algebra 1 and beyond for students in 7th grade and up, the math courses at SASV will fulfill the UC a-g "c"

	requirement in mathematics. The Petitioners have a strong track record of running successful charter school educational programs, including ensuring that students meet a-g requirements.
The Petition does not contain the criteria used by SASV to identify gifted and highly gifted students. Moreover, SASV states in the application that A+ (Advanced STEM) is for gifted/highly gifted students. The Petition fails to state why this program is only available for the gifted and highly gifted students.	This level of detail is not required in a charter petition. In the Petition, however, the Petitioners state on numerous occasions that NWEA MAP tests are used to identify student levels and needs. Moreover, the District does not identify gifted and talented students nor does it offer any programs targeted for gifted and talented students. Gifted and talented students currently receive NO special services in the District. The Petitioners have a strong track record of running successful charter school educational programs, including providing support for gifted and talented students.
e. Curriculum	
The section on Elementary Curriculum discusses instructional practices, strategies and approaches but there is no connection to curriculum. The Petition does not include a defined map for the different curricular areas for elementary programs. In addition, there is no mention of Designated or Integrated English Language Development, [*sic*]	This level of detail is not required in a charter petition. The Petitioners have a strong track record of running successful charter school educational programs for students in grades K-12.
The entire curriculum section raises numerous unanswered questions, including ○ What is SASVs [*sic*] intervention in the Middle School curriculum?	This level of detail is not required in a charter petition. In the Petition, however, the Petitioners provide detailed explanation about the planned Intervention programs. The Petitioners have a strong track record of running successful charter school educational programs for middle school students, including providing support for struggling students.
○ How is Engineering integrated into course	This level of detail is not required in a

curricula?	charter petition. Moreover, the District did not request additional and/or clarifying information from the Petitioners. The Petitioners have a strong track record of running successful charter school educational programs, including integrating Engineering into K-12 curriculum.
○ What about SMPs, of which procedural skills are a subset? Why is this not a part of the Middle School Math Curriculum? Again it appears under the Middle School Math Curriculum that only the gifted and highly gifted students will be able to participate in after school programs.	This level of detail is not required in a charter petition. The petition offers a variety of after school programs to meet the needs of a diverse student population. The Petitioners have a strong track record of running successful charter school educational programs, including providing excellent education in K-12 math for students of all skills, abilities, and aptitudes.
○ How are Science Middle School courses in grades 6-8 (Earth, Life, Chemistry/Physics) different than the current sequence and how will they support STEM education?	This level of detail is not required in a charter petition. As a California public school, the educational program will be in compliance with required state standards, including Common Core standards and, when adopted, the Next Generation Science Standards. The middle school science sequence outlined in the petition mirrors the typical middle school sequence in California, but the SASV curriculum will emphasize interconnections between other STEM fields. The Petitioners have a strong track record of running successful charter school educational programs, including integrating STEM into K-12 curriculum.
○ Middle School English Language Arts first three paragraphs are copied exactly from the Elementary English Language Arts are not appropriate for Middle School.	Here again, the District's response is incorrect. The first three paragraphs in each section, while similar, are **NOT** "copied exactly." They are **NOT** identical. The reason the two sections are similar, however, is that that these are general statements about instructional design that are entirely appropriate for both elementary and middle school students.

	Indeed, the District fails to identify any specific reason WHY such design elements as "literature-based with fluency practice in reading and writing," "conventions of writing," and "integrated into all content areas" cannot be appropriate for both elementary and middle school students. The Petitioners have a strong track record of running successful charter school educational programs, including providing high quality English Language Arts curriculum.
○ In Early Intervention SASV will use the Dedicated Time Intervention Model. What exactly is this model and how will it be used at SASV?	This level of detail is not required in a charter petition. On page 46 of the Petition, however, the Petitioners provide a general outline of this intervention model. Moreover, the District did not request additional and/or clarifying information from the Petitioners. The Petitioners have a strong track record of running successful charter school educational programs, including providing successful intervention programs to struggling students.
○ What is the curriculum SASV has in place for intervention? What is the systematic way of identifying students that need intervention will SASV using? [*sic*]	This level of detail is not required in a charter petition. The petition explains assessments to identify students and intervention programs in detail. The Petitioners have a strong track record of running successful charter school educational programs, including providing successful intervention programs to struggling students.
○ SASV states that Physical Education/Health for grades 6-8 are courses offered as electives. The Petition does not state how its program will meet the state requirements for all students? [*sic*]	This level of detail is not required in a charter petition. As a California public school, the educational program will be in compliance with required state standards. The petitioners have a demonstrated track record of providing high-quality educational

	programs for students.
○ "Advanced" Diploma is equal to SCUSD high school diploma in the number of credits earned. SASV's "Standard" Diploma is below the SCUSD criteria and therefore the students are not expected to have the same base that SCUSD students are required to meet. Why are students being awarded "Advanced" or "Honor" Diplomas when students at the other SCUSD high schools who achieve the amount of credits taking the same kinds of classes are awarded regular diplomas?	This level of detail is not required in a charter petition. As long as SASV's diplomas fulfill state requirements, the petitioners are entitled to provide special school-specific designations to these diplomas. The comment has no bearing on the soundness of SASV's educational program. The petitioners have a demonstrated track record of providing high-quality educational programs for students.
f. Meeting the Needs of All Students	
The Petition is inconsistent in that I-Ready and Study Island are listed as materials for remedial instruction in Math; however, other materials are listed in previous sections.	This level of detail is not required in a charter petition. The petitioners identify a number of possible instructional materials for remediation. SASV staff will be able to select the most appropriate instructional materials for the students. The Petitioners have a strong track record of running successful charter school educational programs, including providing successful intervention programs to struggling students.
There are no textbooks or materials for non-Core classes listed.	This level of detail is not required in a charter petition. SASV staff will be able to select the most appropriate instructional materials for the students. The Petitioners have a strong track record of running successful charter school educational programs, including selecting high quality materials for non-core classes.
The needs related to CCSS, NGSS, STEM, ELD, Special Ed and CTE are not reflected as indicators for professional development needs. The Petition does not state the types of professional development SASV be provide [*sic*] and how it plans to assess the needs of the staff at SASV.	This level of detail is not required in a charter petition. Moreover, until staff is hired, it is impossible to identify the professional development needs of the staff. In order for professional development to be most useful to the staff,

	it must be targeted to the specific needs of the staff. Numerous options for professional development are explained on pages 71-74 of the Petition. Specific decisions on which options will be selected will be made once the staff is selected. The petitioners have a strong track record in identifying professional development needs and providing professional development for staff members.
The petition does not outline nor provide descriptions of how teacher leaders will be developed, share and distribute leadership models that will include teacher leaders. [*sic*]	This level of detail is not required in a charter petition. The petition, however, does mention leadership roles for faculty and delegation through grade level chairs, department chairs, etc. The petitioners have a strong track record in providing opportunities for teacher leadership.
2. Element 2 – Measurable Student Outcomes	
The EL Master Plan is not included in the Petition documents.	The District is incorrect. The EL Master Plan is included on pages 75 through 79. The Petitioners have a strong track record of running successful charter school educational programs, including providing services for English Language Learners.
The CELDT is the state-mandated assessment for all identified EL students in grades TK-12. It is unclear why SASV will first apply NWEA (Northwest Evaluation Association) to initially identify EL students and then use CELDT.	This level of detail is not required in a charter petition. As a California public school, SASV will administer the CELDT and will reclassify students based on State guidelines. The NWEA assessment will provide SASV an additional measure for monitoring EL student progress. NWEA MAP tests can be administered three times a year and will monitor student progress as well as proficiency. The petitioners have a strong track record in educating English language learners and ensuring ELL students make annual progress to English proficiency.

Similarly, it is unclear why SASV will be relying on the MAP test as a measure of English Language Development proficiency.	This level of detail is not required in a charter petition. As a California public school, SASV will administer the CELDT and will reclassify students based on State guidelines. The NWEA assessment will provide SASV an additional measure for monitoring EL student progress. The petitioners have a strong track record in educating English language learners and ensuring ELL students make annual progress to English proficiency.
SEI and the Mainstream English Program according to Education Code are two separate programs. Two daily 50 minute blocks of time – one for ELD instruction and the other for students to be immersed in the regular ELA program should be provided. SASV's Petition is unclear on this issue.	This level of detail is not required in a charter petition. As a California public school, the educational program will be in compliance with state requirements for ELD instruction. The petitioners have a strong track record in educating English language learners and ensuring ELL students make annual progress to English proficiency.
The Petition is unclear about what SASV will do for students needing SDAIE strategies across content areas in grades 6-12.	This level of detail is not required in a charter petition. On pages 75-79 of the petition, however, the Petitioners have included details on SDAIE strategies they intend to use. The petitioners have a strong track record in providing ELD instruction.
The Petition appears to suggest charging fees for impermissible items.	The District's statement is vague and entirely incorrect. There are no fees for any school materials or for participation in any school activities mentioned in the petition. Tellingly, the District does not identify any specific fees appearing in the petition. As a California public school, SASV will fully comply with all state requirements to ensure a free public education for all SASV students. The petitioners have a strong track record in ensuring that all student receive a free public education.

The entire section 1.7.5 Students with Disabilities, Special Education Program Overview is completely out of compliance. Parents are permitted to request assessment at any time. There are very strict laws, deadlines and timelines that must be followed. There must be a very specific set of assessments and team that assesses the student. In the Petition is [*sic*] states "A 504 team made up of parents, tutors, and teachers are not qualified to do many of the assessments required." It also states "A 504 team may also consider the following information, tests and other evaluation materials that have been validated for the specific purpose for which they are used and are administered by trained personnel." A student that qualifies for Special Education does not have a 504 Plan they have an IEP – Individual Education Plan. This lack of understanding of the regulations governing special education calls SASV's expertise into question and suggests that it is not capable of providing required services and supports	The District's statement is entirely incorrect. Section 1.7.5 of the petition clearly describes the manner in which SASV will comply with all federal and state regulations regarding the education of students with disabilities. The District's response suggests that it is unfamiliar with federal laws that require public schools to assess students for special education upon receipt of a request from a parent or guardian. SASV, like all public schools, will be required to assess students for special education if parents make a written request. Federal law is unambiguous on this right of parents. The District's response claims to quote from the Petition, but the first claimed quotation does **NOT** appear in the Petition. It is unclear why the District fabricated this quotation. The second quotation is mostly accurate, and reflects best practices in providing education for students with special needs. If a student is tested for possible referral for special education services yet does not qualify for an IEP, a 504 team SHOULD consider the results of the testing in determining whether or not the student qualifies for a 504 plan. Indeed, the State of California's Northern Diagnostic Center states specifically that among the documents a 504 team should consider is "prior Section 504 or Special Education evaluations or services." http://www.dcn-cde.ca.gov/504/Units/UnitIII.htm The Petitioners have a strong track record in providing appropriate educational services to students with disabilities.
The Petition state that students are on campus until 6:00 p.m. each day engaged in tutoring, clubs, library labs, competitions etc., but does not describe who is supervising the students on Wednesday while the staff is all in meetings from 2:30- 3:30 p.m.	This level of detail is not required in a charter petition. As the Petition indicates, students will have a variety of afterschool enrichment and support options after the regular school day ends. All SASV after school activities will comply with state laws regarding

	supervision. The district quotes from 'a typical day' and short days are not a typical days on school campuses. The Petitioners have a strong track record in providing successful after school activities to students.
3. Element 4 – Governance	
a. Board Legal Compliance	
The Petition fails to include any substantive description of which laws the Board intends to observe and follow, such as Government Code section 1090, the Political Reform Act, and the California Public Records Act. As a result, the Petition fails to describe how the proposed charter school plans on ensuring compliance with laws that are not acknowledged.	The district's statement is incorrect Pages 5 and 6 in the petition provide for legal assurances. The Board of SASV will follow all applicable laws. The Petitioners have a strong track record of ensuring that Board operations are legally compliant.
Further, while the Petition promises compliance with the Brown Act, the Petition is inconsistent with the requirements of the Brown Act with regard to when and where the Board will hold meetings. These inconsistencies demonstrate a lack of understanding of the requirements of the Brown Act.	This level of detail is not required in a charter petition. Section 4.1 of the Petition clearly states that the SASV Board of Directors will comply with the Brown Act. This statement incorporates all aspects of the Brown Act, including those regulating time and place of meetings. The District fails to identify any specific way in which SASV will not comply with the requirements of the Brown Act. The petition cannot determine meeting times and place. The Petitioners have a strong track record in compliance with open meeting laws in multiple jurisdictions, including California.
SASV states that "Board of Directors shall consist of a minimum of three (3) and a maximum of twenty one (7) voting members". However, the Petition does not contain the maximum number – twenty one or seven voting members [*sic*]	The District has identified a typographical error in the Petition. The statement should read ""Board of Directors shall consist of a minimum of three (3) and a maximum of **<u>seven</u> (7) voting members." [Emphasis added.]** **This typographical error has no bearing on the sufficiency of SASV's proposed governance structure.**
In addition, What is the length of time the board will be seated, the Petition fails to	This level of detail is not required in a charter petition.

address the following questions: ○ How does someone become a member of the Board of Directors? ○ Why does SASV not include Administrative personnel that will specifically serve EL, Special Education and students with a 504?	As explained elsewhere in the petition, the Dean of Academics at SASV will oversee all areas of academics, which includes services for EL students and those with disabilities. Services for such students will be provided by appropriately credentialed staff.
b. Local Governance and Administration	
The Petition fails to establish a local governance structure for SASV that enjoys sufficient autonomy to exercise independent judgment from the Magnolia Corporation. There are a variety of places throughout the Petition that highly suggest that the Petitioners remain connected to Magnolia.	The District's statement indicates that the District has not carefully reviewed the Petition. Contrary to the District's assumptions, SASV is **NOT connected to Magnolia Public Schools.** **The Magnolia Educational & Research Foundation which operates Magnolia Public Schools is a non-profit 501(c)(3) organization with a Board of Directors. The meetings of this Board comply with the Brown Act, and this Board has taken no action to support or oppose the SASV petition.** **It is common for individuals who have gained experience in charter school operations to eventually petition to start their own charter school. While some of the current petitioners currently work for Magnolia Public Schools, these individuals are now petitioning to start a new charter school precisely because they seek to have local autonomy from a larger charter management organization.** **The goal of increased local control as a reason for the SASV petition is specifically discussed on page 7.**
c. Parent Involvement	
Petitioners do not offer parents the opportunity to participate in the proposed charter school's operation, but rather expect their labors as an ostensible requirement to secure a student's enrollment in the proposed charter school. (At p.91).	The District's statement is entirely incorrect. The District's response claims to quote from the Petition, but purported statement does **NOT** appear in the Petition. It is unclear why the District fabricated this statement. There is **NO** statement on parent participation on page 91 of the Petition (this

	page covers core academic skills), and **NO** commitment of participation is required as condition of initial **OR** continued enrollment. Opportunities for parent involvement are mentioned many times in the Petition, but the Petition clearly states that parent volunteering "**<u>is not required</u>**." **(p. 106 - emphasis added.)** **Ironically, at least one District school appears to violate state law by requiring parents to volunteer. The website for this school clearly states "Besides contributing on your regular work day, Washington Open participation <u>requires</u> that each working parent work at least one additional hour per week usually by volunteering for classroom jobs and projects, or serving on committees and boards." (emphasis added)** https://woe-scusd-ca.schoolloop.com/parentboard.html The petitioners have a strong track record in ensuring that all student receive a free public education.
4. Element 5 – Employee Qualifications	
a. Descriptions Unrealistic	
The Petition's description of personnel is inconsistent with the proposed budget documents submitted with the Petition, and does not appear realistic or sustainable.	The District offers no specific detail on how it reached the conclusion that the personnel budget is unrealistic or unsustainable. The projected staffing and budget is reasonable and sustainable based on comparisons with other local charter schools. The Petitioners have a strong track record in charter school operations including ensuring that spending on personnel is in line with budget constraints.
The Petition fails to firmly identify how the proposed charter school will be staffed. The ability to determine the reasonableness of descriptions of positions requires a concrete staffing plan, which Petitioners do not provide.	The District's statement is entirely incorrect. It also contradicts statements elsewhere in its response where it refers to SASV's staffing plan. The Petition provides far more detail on staffing than is required. The projected budget provides details on the

	number of classified and certificated staff members SASV expects to hire, and the projected enrollment numbers at each grade level provide additional details. The Petitioners have a strong track record in charter school operations including ensuring staffing is in line with school needs.
The Petition fails in numerous instances to dispositively address issues that affect staffing decisions and, in turn, the Staff Team's ability to determine the reasonableness of descriptions of positions. Accordingly, it is unclear whether staff members will be paid to assume additional duties, or whether staff members will be required to take on additional duties not identified in their job descriptions. It is thus unclear whether the Petition sets forth reasonably comprehensive descriptions of positions.	The District's statement is entirely incorrect. The Petition provides detailed job descriptions for all staff members. These job descriptions are found on pages 109-117 of the petition, and they are very detailed. The District has no basis to speculate on whether or not staff members may be asked to perform additional duties let alone whether or not there might be additional pay for these unidentified "additional duties." The Petitioners have a strong track record in charter school operations including ensuring that spending on personnel is in line with budget constraints.
In fact, the Petition affirmatively leaves unclear aspects of work duties, which Petitioners apparently intend to fashion at some time in the future. Petitioners did not provide the Employee Handbook.	This level of detail is not required in a charter petition. Even so, the Petition provides detailed job descriptions for all staff members. These job descriptions are found on pages 109-117 of the petition, and they are very detailed. The District falsely claims that the Petition leaves "affirmatively leaves unclear aspects of work duties." There is no such statement in the Petition. The Petitioners have a strong track record in charter school operations including ensuring that staff members are clearly aware of their duties.
b. Compensation Structure	
The Petition places a substantial amount of responsibility on classroom teachers, but budgets only meager salaries for teachers (assuming a straight split of compensation for 34 credentialed FTE). The Petition makes other promises of longer school days without	While District staff may consider the salaries "meager," the projected amounts are reasonable based on comparisons with other local charter and private schools. The District also assumes that pay is the

more pay or benefits.	only criteria educators use in evaluating a job offer. With extensive experience in charter school operations, the petitioners know that many teachers actively choose to teach in charter schools for a variety of reasons. The Petitioners have a strong track record in charter school operations including ensuring that spending on personnel is in line with budget constraints.
c. Professional Development	
Similarly, the Petitioners propose professional development, without funding or adequately describing how and when it will be provided to such a busy and small group of teachers. It does not appear from the budget that there is funding sufficient for the trainings for 24 teachers, particularly given the absence of budget notes to explain the allocation of funding.	The District's statement is entirely incorrect. The proposed budget includes line items for both conferences and professional services; the latter could include on-site professional development. More specific detail on how these amounts will break down is not required. Moreover, the petitioners identify a number of possible professional development opportunities on pages 73-74 of the Petition. Other opportunities for staff development are included throughout the Petition. The Petition also identifies regularly available time for staff development: in-service days prior to the school year, weekly staff meeting time, and scheduled in-service days during the school year. In contrast, the District has no weekly time that can be dedicated to staff development. The level of detail is more than required in a charter petition, and more specific plans cannot be made until the staff is hired and the professional development needs can be assessed. The petitioners have a strong track record in identifying professional development needs and providing professional development for staff members.
d. Qualifications and Advancement	
The Petition in unclear as to whether Special Education teachers are required to have a	The District's statement is entirely incorrect.

Special Education Credential? [*sic*]	The job description for Special Education Teacher clearly states that the teacher must hold a "California Commission on Teacher Credentialing certificate, permit or other documentation equivalent to what a special education teacher in other public schools would be required to hold." (p. 114) In addition, the District's statement reflects a faulty understanding of the Petition. The Petition clearly states that the "School will be designated as a public school of the Santa Clara USD for special education services." (p. 85) In this case, SCUSD will have the option to provide the special education teachers and staff for the school, and the District will have the responsibility to ensure that the personnel are appropriately credentialed. Should the school exercise its option to apply to any Special Education Local Plan Area (SELPA) in the state to operate as a local educational agency within the SELPA, the Petition is clear that it will comply with all regulations regarding the provision of services to special education students, including the requirements to hire appropriately credentialed staff. The petitioners have a strong track record in ensuring students with disabilities receive special education services as required by law.
The Petition is unclear as to who will be organizing, writing and holding the IEP meetings with staff and parents.	The District's statement is entirely incorrect. The job description for Special Education Teacher clearly states that the Special Education teacher will "work in conjunction with students, parents and other members of staff to develop IEPs." Developing IEPs includes organizing and writing IEPs and holding required meetings. Moreover, the District's statement reflects a faulty understanding of the Petition. The Petition clearly states that the "School will be designated as a public school of the Santa Clara USD for special education services." (p. 85) In this case, SCUSD will

	assume the responsibility for determining who will be organizing, writing and holding the IEP meetings with staff and parents. Should the school exercise its option to apply to any Special Education Local Plan Area (SELPA) in the state to operate as a local educational agency within the SELPA, the Petition is clear that it will comply with all regulations regarding preparing and monitoring IEPs. The petitioners have a strong track record in ensuring students with disabilities receive special education services as required by law.
The Petition is unclear as to SASV's hiring procedures for hiring Special Education aides.	This level of detail is not required in a charter petition. Even so, the District's statement reflects a faulty understanding of the Petition. The Petition clearly states that the "School will be designated as a public school of the Santa Clara USD for special education services." (p. 85) In this case, SCUSD will assume the responsibility for hiring special education aides. Should the school exercise its option to apply to any Special Education Local Plan Area (SELPA) in the state to operate as a local educational agency within the SELPA, the Petition is clear that it will comply with all regulations regarding hiring special education aides. The petitioners have a strong track record in ensuring students with disabilities receive special education services as required by law.
The Petition is unclear as to what type of training and ongoing training will be given to Special Education aides.	This level of detail is not required in a charter petition. The petitioners have a strong track record in ensuring all staff have the necessary training to perform their jobs.
The Petition is unclear as to why Special Education aides are restraining "disruptive or dangerous students".	The District is selectively quoting from the job description.

	The full sentence from the job description for Special Education Aide is: "Assist in student behavior management; this includes handling crisis situations and restraining disruptive or dangerous students as needed." (p. 116) This is a common element in job descriptions for special education aides because aides may be required to help prevent students from injuring themselves or others, but such interventions take place only in crisis situations.
The Petition is unclear as to what type of Behavioral Plan training SASV will have in place for its teachers and support staff.	This level of detail is not required in a charter petition. The petitioners have a strong track record in ensuring all staff have the necessary training to perform their jobs.
The Petition is unclear as to what type of evaluation procedures are in place to evaluate the Principal, Teachers and other Personnel staff.	This level of detail is not required in a charter petition. Teacher Evaluation, however, are explained on pg 73 of the petition. The petitioners have a strong track record in evaluating staff.
The Petition is unclear as to what SASV's timelines and evaluation forms are for the Administrative staff, teachers and classified personnel?	This level of detail is not required in a charter petition. Teacher Evaluation, however, are explained on pg 73 of the petition. The petitioners have a strong track record in evaluating staff.
The Petition is unclear as to performance pay what it is based on? [*sic*]	This level of detail is not required in a charter petition. The petitioners have a strong track record in evaluating staff.
The Petition is unclear as to how and when will SASV staff members earn performance pay in the form of bonuses.	This level of detail is not required in a charter petition. The petitioners have a strong track record in evaluating staff.
5. Element 7 – Racial and Ethnic Balance	

The recruitment efforts that will be used to achieve racial and ethnic balance are also vaguely described, if at all. The listed strategies are not defined with any particularity or reflection upon the District's racial and ethnic make-up or demography and do not identify outreach through means that will reach a diverse student population.	Means to achieve racial and ethnic balance are explained on page 125 of the petition. The petitioners have a strong track record in recruiting a diverse student body.
The Petition identifies inadequate outreach efforts.	The outreach efforts are xplained on pages 125-126. The petitioners have a strong track record in recruiting a diverse student body.
The Petition indicates that "bilingual translators" will be hired; however, there appears to be no budget for this expenditure.	This level of detail is not required in a charter petition. The proposed budget includes a line item for professional services. Translation services would fall under this line item. In addition, the school anticipates hiring bilingual and multilingual staff who will also be able to assist with translating. The petitioners have a strong track record in reaching out to and serving diverse communities.
6. Element 8 – Admission Requirements	
Admissions policy is confusing as it provides for a single weighted lottery but then identifies six categories of preferred admissions.	The petition explains enrollment and lottery procedures as required by the law. The petitioners have a strong track record in running charter school lotteries.
Petitioners are required to achieve racial and ethnic balance that reflects the District's community. However, the Petition sets out requirements that will result, in enrollment of student populations that Petitioners wish to attract, rather than the community as a whole.	The District offers no specific detail on how it reached the conclusion that SASV will NOT attract an enrollment that reflects the community as a whole.The petition does not set any requirements for enrollment. The petitioners have a strong track record in reaching out to and serving diverse communities.
7. Element 16 – Closure	
The Petition's closure procedures do not describe the process of ○ the return of any donated materials and property according to any conditions set	The procedures for charter school closure is explained on pages 144-145 of the petition.

when the donations were accepted; ○ the return of any grant and restricted categorical funds to their source according to the terms of the grant or state and federal law; ○ submission of final expenditure reports for any entitlement grants and the filing of Final Expenditure Reports and Final Performance Reports, as appropriate.	
8. Additional Provisions	
The Petition fails to adequately address several other factors required by the Charter Schools Act, including facilities. As noted above, Petitioners project an enrollment of 585 and ADA of 556. The Petitioners have not stated how they intend to house such a large population of students. Even assuming SASV could remain in the current Magnolia location, that facility is insufficient to house the number of projected students. Nor does the budget adequately provide for the costs fo [*sic*] housing such a large population.	The District's statement reflects a faulty understanding of charter school law. Under Prop 39, the District is required to provide the facilities required by the number of in-district students enrolled at SASV. If the number of students enrolled at SASV exceeds what can be housed at one location, the District can work with SASV to reach a facilities agreement that might split the school over two sites. In short, it is not the Petitioners' responsibility to provide a facilities plan. That responsibility falls to the District.