

**STAFF ANALYSIS, RECOMMENDATIONS, AND PROPOSED FINDINGS OF FACT REGARDING REVIEW OF  
VOICES COLLEGE-BOUND LANGUAGE ACADEMY AT MORGAN HILL CHARTER SCHOOL RENEWAL PETITION**

JANUARY 21, 2026, posted JANUARY 6, 2026

\* \* \* \* \*

Voices College-Bound Language Academy at Morgan Hill Charter School (VMH) seeks approval of the renewal of its Santa Clara County independent, direct funded, district appeal charter school serving students in grades TK-8. VMH was initially approved on appeal from Morgan Hill Unified School District (MHUSD) in November 2014, for a three-year term to serve grades K-8 and opened in August of 2015. VMH was renewed in 2017. VMH was materially revised in 2022 to temporarily relocate to three locations due to termination of lease and waiting for permanent structure to be completed. VMH's current term expires June 30, 2026, as its term was extended by operation of law by two years in 2021 and an additional year in 2023. VMH has requested renewal for a term of five years from July 2026 through June 2031, due to its designation by the California Department of Education (CDE) as a school in the middle performing category. VMH, located within the MHUSD boundaries, currently serves approximately 400 students.

**PROCEDURAL STATUS**

The Charter Schools Department of the Santa Clara County Office of Education (County Office of Education or SCCOE) received a renewal charter petition (Renewal Petition or Charter) from VMH on October 24, 2025. VMH is operated and governed by Voices College-Bound Language Academies (VCBLA).<sup>1</sup> *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, VMH 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 (SCCBOE or County Board of Education<sup>2</sup>), the new term of the Charter would begin on July 1, 2026, and run through and including June 30, 2031. Renewals of district appeal charters are governed by the standards and criteria set forth in EC Sections 47605, 47607 and 47607.2.

On November 5, 2025, the SCCBOE held a public hearing on the VMH Renewal Petition in accordance with the requirement to do so within 60 days of receipt of submission of the Renewal Petition. On November 12, 2025, SCCOE Staff conducted a renewal site visit and held renewal interviews with VMH parents, students, staff, board members, and representatives of VCBLA leadership as the charter management organization or network.

---

<sup>1</sup> Throughout this document, Voices College-Bound Language Academies may be referred to for purposes of convenience as "VCBLA," "CMO," or "Network," but the Voices College-Bound Language Academy at Morgan Hill charter school and Voices College-Bound Language Academies may be referred to collectively, separately, or interchangeably as "VMH" or "Charter School" or "school."

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

Pursuant to *EC* Sections 47607, 47607.2 and 47605, the County Board of Education has 90 days from receipt of the renewal application to act, which may be extended by an additional 30 days by mutual agreement. SCCBOE will hold the decision hearing January 21, 2026, to act on the VMH request for renewal.

In accordance with Board Policy 0420.4, SCCOE, VMH, and VCBLA, developed a Memorandum of Understanding in 2018 (2018 MOU) which was amended in 2022 via an addendum (2022 Addendum) when VMH submitted a request for material revision. By their terms, this 2018 MOU and 2022 Addendum “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 2018 MOU and 2022 Addendum govern 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 and entry into a replacement or supplementing MOU and/or addendum. By their terms, the 2018 MOU and 2022 Addendum are incorporated into the Renewal Petition by reference, therefore, their terms supplement the Renewal Petition submitted by VMH 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 2018 MOU and 2022 Addendum are referenced in this analysis, and they continue 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 2018 MOU and 2022 Addendum may need to be incorporated therein or the 2018 MOU and 2022 Addendum remain in effect.

SCCOE has provided and VMH has approved and executed an updated memorandum of understanding (2025 MOU) that is consistent with changes to law since entering into the 2018 MOU and 2022 Addendum and reflects SCCOE’s current best practices.

The complete Renewal Petition on which the SCCBOE is acting is attached to the agenda item in Board Docs and is also available for review at the following location: [2025 Voices Morgan Hill 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. *EC* Section 47607(b) specifies that charter renewals “are governed by the standards and criteria described in Section 47605, and shall include, but not be limited to, a reasonably comprehensive description of any new requirement of charter schools enacted into law after the charter was originally granted or last renewed.”

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

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

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

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

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 VMH as a “middle” performing charter school for purposes of this renewal request.

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 (note, the standards for renewal of middle performance tier charter schools were modified by operation of law effective January 1, 2026):

*The schoolwide and subgroup performance on the state and local indicators on the Dashboard, giving greater weight to measurements of academic performance.*

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, 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 does not serve all pupils who wish to attend.*

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

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

## **DETERMINATION CRITERIA FOR RENEWAL OF VMH**

As stated above, CDE has designated VMH as a school in the middle performance category for purposes of this renewal. In its Renewal Petition, VMH 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, VMH 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 VMH students would otherwise have attended. VMH states the data submitted on pages 7 through 21 of the Renewal Petition establishes VMH as a school in the middle performing category, meeting the criteria for charter renewal. Staff has not reproduced all the information provided by VMH in this Staff Analysis and Proposed Findings of Fact but incorporates it and the CAASPP data herein by this reference.

The SCCBOE requested from VMH additional data and information in response to questions asked during the November 5, 2025, public hearing on the Charter renewal. On December 18, 2025, VMH provided the information.

The data below represents key data provided by VMH and/or available for consideration of VMH’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 the lowest and Blue being the highest (see Object 1 below). A performance level, or color is not provided on the Dashboard when a student group has fewer than 30 students. However, the Status and Change data will be displayed. Further, when a student group has fewer than 11 students, the group does not receive a performance level (color), and the group’s Status and Change are not displayed to protect the anonymity of the students. This information is represented by using a grey color gauge with the words “No Performance Color.”

***Object 1: California Dashboard Performance Color Chart***



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

**Object 2: VMH Performance on 2025 California School Dashboard**

	2025 CALIFORNIA SCHOOL DASHBOARD									
	ELA		Math		ELPI		Chronic Absenteeism		Suspension	
	DFS	Level	DFS	Level	Rate	Level	Rate	Level	Rate	Level
All Students	-46.7	YELLOW	-49.6	YELLOW	57.5%	BLUE	25.8%	ORANGE	3.3%	YELLOW
Hispanic/Latino	-48.9	YELLOW	-52.4	YELLOW			25.7%	ORANGE	3.4%	YELLOW
English Learners (EL)	-59.9	YELLOW	-63.2	YELLOW	57.5%	BLUE	26.4%	YELLOW	4.2%	ORANGE
Long-Term EL (LTE)	-68.3	YELLOW	-105.0	ORANGE	73.8%	BLUE	40.0%	RED	11.1%	ORANGE
Students with Disabilities (SWD)	-109.3	NPC	-122.1	NPC			37.0%	ORANGE	8.7%	ORANGE
Socioeconomically Disadvantaged (SED)	-57.6	ORANGE	-58.5	YELLOW			27.8%	RED	4.3%	YELLOW

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

In 2024-25, VMH received a Distance from Standard (DFS) score of -46.7 in ELA and increased 8.8 points from the prior year, making the performance level for all students Yellow. VMH received a DFS score of -49.6 in Math and increased 22 points from the prior year, making the performance level for all students Yellow. VMH also increased 11.6 percentage points from the prior year and received Blue on the English Learner Progress Indicator (ELPI).

**SPACE INTENTIONALLY LEFT BLANK**

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

	Suspension Rate		Chronic Absenteeism		English Language Arts		Mathematics		English Learner Progress	
	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025
<b>All</b>	RED 4.4%	YELLOW 3.3%	YELLOW 26.9%	ORANGE 26.9%	YELLOW - 55.5 DFS	YELLOW -46.7 DFS	YELLOW -71.5 DFS	YELLOW -49.6 DFS	ORANGE 55.5%	BLUE 57.5%
<b>EL</b>	RED 4.1%	ORANGE 4.2%	YELLOW 29.4%	YELLOW 26.4%	RED -70.1 DFS	YELLOW -65.4 DFS	ORANGE -87.2 DFS	YELLOW -63.2 DFS	ORANGE 55.5%	BLUE 57.5%
<b>LTEls</b>	NPC	ORANGE 11.1%	RED 36.1%	RED 40%	NPC -92.9 DFS	YELLOW -68.3 DFS	NPC 115.1 DFS	ORANGE -105.0 DFS	NPC 53.3%	BLUE 73.8%
<b>SED</b>	RED 4.8%	YELLOW 4.3%	YELLOW 27.8%	RED 27.8%	ORANGE -56.1 DFS	ORANGE- 57.6 DFS	ORANGE -74.8 DFS	YELLOW -58.5 DFS		
<b>SWD</b>	RED 9.4%	ORANGE 8.7%	ORANGE 40.6%	ORANGE 37%	NPC -115.2 DFS	NPC -122.1 DFS	NPC -158.6 DFS	NPC -122.1 DFS		
<b>Asian</b>	NPC	NPC	NPC	NPC	NPC	NPC	NPC	NPC		
<b>Hispanic/ Latino</b>	RED 4.6%	YELLOW 3.4%	YELLOW 26.8%	ORANGE 25.7%	ORANGE -56.8 DFS	YELLOW -48.9 DFS	ORANGE -71.6 DFS	YELLOW -52.4 DFS		
<b>White</b>	NPC	NPC	NPC	NPC	NPC	NPC	NPC	NPC		
<b>African American</b>	NPC	NPC	NPC	NPC	NPC	NPC	NPC	NPC		
<b>Filipino</b>	NPC	NPC	NPC	NPC	NPC	NPC	NPC	NPC		
<b>Homeless</b>	NPC	NPC	NPC	NPC	NPC	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.  
Data retrieved from: <https://caschooldashboard.org>

Many areas of the VMH Dashboard have no performance color (“NPC”) due to the small size of the student group. Object 3 above shows VMH’s status for both the 2024 and 2025 Dashboard indicators for all students and all numerically significant student groups.

Object 4 below shows the Status and Change information from the 2024 and 2025 Dashboard indicators. For most of the Dashboard measures, the desired outcome is a high number or percent in the current year as well as an increase from the prior year. A distinguishing feature of the suspension and chronic absenteeism measures is the desired outcome for low suspension and chronic absenteeism rates, which means a low percent in the current year and a decline from the prior year rate. At VMH, both suspensions and chronic absenteeism rates maintained or decreased for all students and for most numerically significant student groups, except for a 3.9% increase chronic absenteeism for Long Term English Learners (LTEls).

**Object 4: 2025 California School Dashboard Student Status and Change Report for VMH**

	Suspension Rate	Chronic Absenteeism	English Language Arts	Mathematics	English Learner Progress
All	Declined 1.1%	Declined 1.1%	Increased 8.8 points	Increased 22.0 points	Increased 11.6%
EL	Maintained 0.1%	Declined 3.0%	Increased 4.7 points	Increased 24.0 points	Increased 11.6%
LTELs	Declined 2.4%	Increased 3.9%	Increased 24.6 points	Increased 10.2 points	Increased 20.5%
SED	Declined 0.6%	Maintained 0%	Maintained -1.5 points	Increased 16.3 points	
SWD	Declined 0.7%	Declined 3.7%	NPC Increased 5.9 points	NPC Increased 36.5 points	
Asian	NPC	NPC	NPC	NPC	
Hispanic/Latino	Declined 1.1%	Declined 1.1%	Increased 7.9 points	Increased 19.3 points	
African American	NPC	NPC	NPC	NPC	
Filipino	NPC	NPC	NPC	NPC	
White	NPC	NPC	NPC	NPC	
Homeless	NPC	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.*

*Data retrieved from: <https://caschooldashboard.org>*

Objects 5 and 6 below show data comparing the Dashboard indicators for all students and by student group for VMH and the State on the 2024 (2023-24) and 2025 (2024-25) Dashboards. On the 2024 (2023-24) Dashboard, VMH outperforms the State in ELA for LTELs; in Math for EL, LTELs, SED, and Hispanic populations; and on the ELPI for all indicators (as indicated by the content data in Bold). On the 2025 (2024-25) Dashboard, VMH outperforms the State in ELA with the LTELs group; in Math for EL, SED, and Hispanic populations; and on the ELPI for all indicators (as indicated by the content data in Bold). Notably, VMH students outperform the State in multiple areas on both the 2024 and 2025 Dashboards in multiple indicators, causing VMH to be in the middle performance category.

**SPACE LEFT INTENTIONALLY BLANK**

**Object 5: 2024 California School Dashboard Student Group Data for VMH and the State**

	Suspension Rate		Chronic Absenteeism		English Language Arts		Mathematics		English Learner Progress	
	VMH	State	VMH	State	VMH	State	VMH	State	VMH	State
<b>All</b>	RED 4.4%	GREEN 3.2%	YELLOW 26.9%	YELLOW 18.6%	ORANGE -55.5 DFS	ORANGE -13.2 DFS	ORANGE -71.5 DFS	ORANGE -47.6 DFS	ORANGE 55.5%	ORANGE 45.7%
<b>EL</b>	RED 4.1%	GREEN 3.4%	YELLOW 29.4%	YELLOW 20.1%	RED -70.1 DFS	ORANGE -67.6 DFS	ORANGE -87.2 DFS	ORANGE -93.4 DFS	ORANGE 55.5%	ORANGE 45.7%
<b>LTELs</b>	RED 13.5%	ORANGE 8.1%	RED 36.1%	YELLOW 23.9%	NPC -92.9 DFS	RED -109.6 DFS	NPC -115.1 DFS	RED -163.5 DFS	NPC 53.3%	ORANGE 45.8%
<b>SED</b>	RED 4.8%	GREEN 4%	YELLOW 27.8%	YELLOW 23.4%	ORANGE -56.1 DFS	ORANGE -40.9 DFS	ORANGE -74.8 DFS	ORANGE -78.2 DFS		
<b>SWD</b>	RED 9.4%	YELLOW 5.4%	ORANGE 40.6%	YELLOW 26.3%	NPC -115.2 DFS	RED -95.6 DFS	NPC -158.6 DFS	RED -124.3 DFS		
<b>Hispanic/Latino</b>	RED 4.6%	GREEN 3.4%	YELLOW 26.8%	YELLOW 21.7%	ORANGE -56.8 DFS	ORANGE -39.3 DFS	ORANGE -71.6 DFS	ORANGE -79.2 DFS		

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

**Object 6: 2025 California School Dashboard Student Group Data for VMH and the State**

	Suspension Rate		Chronic Absenteeism		English Language Arts		Mathematics		English Learner Progress	
	VMH	State	VMH	State	VMH	State	VMH	State	VMH	State
All	YELLOW 3.3%	GREEN 2.9%	ORANGE 25.8%	YELLOW 17.1%	YELLOW -46.7 DFS	YELLOW -8.1 DFS	YELLOW -49.6 DFS	YELLOW -42.4 DFS	BLUE 57.5%	YELLOW 46.4
EL	ORANGE 4.2%	YELLOW 3.2%	YELLOW 26.4%	YELLOW 18.1%	YELLOW -65.4 DFS	YELLOW -59.9 DFS	YELLOW -63.2 DFS	YELLOW -86.1 DFS		
LTEls	ORANGE 11.1%	YELLOW 7.0%	RED 40.0%	ORANGE 22.5%	YELLOW -68.3 DFS	ORANGE -104.5 DFS	YELLOW -49.6 DFS	YELLOW -42.4 DFS		
SED	YELLOW 4.3%	GREEN 3.6%	RED 27.8%	ORANGE 21.7%	ORANGE -57.6 DFS	YELLOW -35.3 DFS	YELLOW -58.5 DFS	YELLOW -72.9 DFS		
SWD	ORANGE 8.7%	YELLOW 5.0%	ORANGE 37.0%	ORANGE 24.9%	NPC -109.3 DFS	ORANGE -89.4 DFS	NPC -122.1 DFS	ORANGE -120.7 DFS		
Hispanic/ Latino	ORANGE 3.4%	GREEN 3.0%	ORANGE 25.7%	ORANGE 20.1%	YELLOW -48.9 DFS	YELLOW -33.7 DFS	YELLOW -52.4 DFS	YELLOW -73.6 DFS		

Data retrieved from: <https://caschooldashboard.org>

**CAASPP Data**

The tables below reflect the CAASPP data (<https://caaspp-elpac.cde.ca.gov/>) verified by SCCOE staff while determining VMH's schoolwide student performance and progress relative to the district and schools with the largest student populations enrolled at VMH. The tables below constitute the most recent academic data available for review.



**Object 7: Percentage of ALL STUDENTS At or Above Standard on CAASPP in ELA and Math at VMH, MHUSD, and Statewide for 2023-24**

2023-24 CAASPP (ELA)			
Grade	VMH	MHUSD	State
3	6.26	39.51	42.80
4	21.05	41.93	43.90
5	31.03	47.11	47.37
6	36.84	43.28	45.82
7	34.38	42.01	47.20
8	52.17	47.54	45.96
All	29.17	44.98	47.04

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

2023-24 CAASPP (Math)			
Grade	VMH	MHUSD	State
3	22.58	44.57	45.63
4	18.42	41.59	41.20
5	21.43	34.54	35.02
6	10.26	29.32	34.32
7	21.21	33.46	33.83
8	30.44	27.50	31.56
All	19.79	34.34	35.54

**Object 7a: Percentage of ALL STUDENTS At or Above Standard on CAASPP in ELA and Math at VMH, MHUSD, and Statewide for 2024-25**

2024-25 CAASPP (ELA)			
Grade	VMH	MHUSD	State
3	30.44	37.42	44.21
4	30.44	44.19	45.70
5	39.13	46.67	48.80
6	24.13	39.71	48.06
7	38.64	49.64	49.65
8	37.50	47.03	47.84
All	33.74	47.11	48.82

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

2024-25 CAASPP (Math)			
Grade	VMH	MHUSD	State
3	45.65	40.46	46.30
4	36.95	42.50	42.25
5	34.04	31.49	36.03
6	17.24	29.88	36.60
7	22.73	36.94	36.08
8	18.75	35.83	33.94
All	30.74	35.55	37.30

Objects 7 and 7a, above, reflect the 2023-24 and 2024-25 CAASPP results in English Language Arts (ELA) and Math for VMH, MHUSD, and the State. In both ELA and Math, VMH is outperformed by MHUSD and the State for both years.

**Object 8: Four-Year Trend of the Percentage for ALL STUDENTS At or Above Standard on CAASPP ELA and Math at VMH, MHUSD, and Statewide**

Four-Year Trend CAASPP (ELA)				
	21-22	22-23	23-24	24-25
VMH	32.53	31.53	29.17	33.74
MHUSD	46.69	43.07	44.98	47.11
State	47.06	46.66	47.04	48.82

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

Four-Year Trend CAASPP (Math)				
	21-22	22-23	23-24	24-25
VMH	25.00	28.80	19.79	30.74
MHUSD	33.14	32.24	34.34	35.55
State	33.38	34.62	35.54	37.30

Object 8, above, reflects schoolwide student achievement in ELA and Math across the last four years of CAASPP for VMH, MHUSD, and the State. In looking at the trends, VMH scores show declines from 2021-22 through 2023-

24, but increase in 2024-25 for both ELA and Math. However, when compared to the State and MHUSD scores, both exceed VMH's for the four comparable years. However, as both the State and MHUSD scores include grade 11, it prevents one-to-one comparisons unless looking at each grade level individually, which also show that the State and MHUSD outperformed VMH in all grades for both ELA and Math for 2024-25 and all grades for both ELA and Math, except 8<sup>th</sup> in ELA for 2023-24.

**Object 9: Four-Year Trend of the Percentage of Numerically Significant Student Groups At or Above Standard on CAASPP in ELA and Math for VMH Grades 3-8**

ELA					Math				
	21-22	22-23	23-24	24-25		21-22	22-23	23-24	24-25
ALL	32.53	35.76	33.08	31.04	ALL	25.00	31.41	27.27	28.10
SWD	11.54	23.53	15.79	9.68	SWD	7.70	11.76	0.00	3.23
Hispanic/ Latino	32.19	31.49	28.57	32.90	Hispanic/ Latino	25.00	28.73	19.58	30.34
SED	28.00	31.82	29.03	29.28	SED	23.57	27.48	18.18	25.96
EL	18.32	20.56	12.50	17.22	EL	12.31	11.11	7.14	19.74

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

Object 9, above, reflects the CAASPP results for numerically significant student groups at VMH over the last four years. In both ELA and Math, the data shows mixed results in the percentages of all students and all numerically significant student groups performing at or above standard over the four years.

**Object 10: Comparison of the Percentage of Students At or Above Standard on 2024 CAASPP ELA Results for VMH, MHUSD, State, and MHUSD Schools Near VMH**

2023-24 CAASPP (ELA)						
Group	VMH	MHUSD	Walsh	San Martin/ Gwinn	Barrett	State
ALL	29.17	44.98	16.22	26.16	26.74	47.04
SED	29.49	30.24	10.20	16.03	17.08	36.81
Hispanic/ Latino	28.57	22.86	9.45	15.03	16.13	32.96
EL	12.50	6.96	3.57	4.93	5.46	10.29
SWD	15.79	9.36	0.00	5.26	0.00	15.83

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

**SPACE LEFT INTENTIONALLY BLANK**

**Object 10a: Comparison of the Percentage of Students At or Above Standard on 2025 CAASPP ELA Results for VMH, MHUSD, State, and MHUSD Schools Near VMH**

2024-25 CAASPP (ELA)						
Group	VMH	MHUSD	Walsh	San Martin/ Gwinn	Barrett	State
ALL	33.74	47.11	21.34	26.75	27.11	48.82
SED	29.51	29.73	15.25	18.11	17.95	38.23
Hispanic/ Latino	29.28	24.86	13.00	17.98	12.36	55.04
EL	17.22	8.53	8.70	8.09	9.80	10.41
SWD	9.68	8.70	0.00	5.36	2.13	16.95

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

**Object 11: Comparison of the Percentage of Students At or Above Standard on 2024 CAASPP Math Results for VMH, MHUSD, State, and MHUSD Schools Near VMH**

2023-24 CAASPP (Math)						
Group	VMH	MHUSD	Walsh	San Martin/ Gwinn	Barrett	State
ALL	19.79	34.34	22.46	19.09	25.14	35.54
SED	18.71	21.54	17.57	9.88	18.70	24.98
Hispanic/ Latino	18.18	14.10	15.62	9.59	13.98	20.48
EL	7.14	7.42	14.12	4.73	7.27	10.25
SWD	0.00	8.18	3.03	5.26	4.35	12.54

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

**Object 11a: Comparison of the Percentage of Students At or Above Standard on 2025 CAASPP Math Results for VMH, MHUSD, State, and MHUSD Schools Near VMH**

2024-25 CAASPP (Math)						
Group	VMH	MHUSD	Walsh	San Martin/ Gwinn	Barrett	State
ALL	30.74	35.55	26.34	19.07	20.71	37.30
SED	26.23	18.75	19.84	9.75	12.82	26.19
Hispanic/ Latino	25.96	14.94	18.63	10.00	8.99	40.10
EL	19.74	6.25	12.68	3.57	7.27	11.01
SWD	3.23	6.90	3.57	1.79	2.13	13.10

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

Objects 10, 10a, 11, and 11a above, reflect the 2023-24 and the 2024-25 CAASPP data as compared to the State, MHUSD and the MHUSD schools VMH students would otherwise have attended as well as schools in proximity to VMH: Walsh, San Martin/Gwinn, and Barrett. Overall, VMH's ELA and Math scores outperform the comparison

## VMH Charter School

schools in both 2023-24 and 2024-25 for all students and the numerically significant student groups (see the green highlights for schools and student groups which are outperformed by VMH). While VMH is outperformed in both ELA and Math for 2023-24 and 2024-25 (see the light red highlights) by the district and the State for all students and several student groups, VMH does outperform all comparison groups for EL in both ELA and Math for 2024-25.

### ELPI/ELPAC Data

Object 12 below (from <https://caaspp-elpac.cde.ca.gov/>), reflects the 2024-25 English Learner Proficiency Indicator (ELPI) data as evidenced on English Language Proficiency Assessment of California (ELPAC) data. This is compared across VMH, the State, MHUSD, and the schools in MHUSD that VMH students otherwise would have attended: Walsh, San Martin/Gwinn, and Barrett. VMH outperformed all comparison entities in all categories, except San Martin/Gwinn in the percentage of students who increased one or more ELPI levels (see the green highlights for entities outperformed by VMH and the light red highlights for entities that outperform VMH).

#### Object 12: 2025 Comparison of EL Progress Measured by ELPAC

	VMH	MHUSD	Walsh	San Martin/ Gwinn	Barrett	State
<i>Increased one or more ELPI levels</i>	48.1%	47.4%	33.9%	52.2%	35.1%	45.2%
<i>Maintained level 4</i>	9.4%	1.1%	0.0%	1.1%	0.0%	1.3%
<i>Total % making progress</i>	57.5%	48.5%	33.9%	53.4%	34.6%	46.4%
<i>Performance Level</i>	Blue	Green	Red	Green	Red	Yellow
<i>Number of Students</i>	181	977	121	189	78	777,537

Data retrieved from: <https://caschooldashboard.org>

### Renewal Site Visit

On November 7, CSD staff conducted a Renewal Site Visit to the VMH campus. CSD staff visited classrooms, met with site and network leadership, and conducted focus group interviews with educational partners such as current students, parents, VCBLA board members, and teachers. During the visit, CSD staff observed instructional practices and routines consistent with the academic model outlined in the petition.

### Finances

Object 13, below, provides an eight-year historical financial summary for VMH from Fiscal Year (FY) 2017-18 through FY 2024-25. The financial data for FY 2024-25 is based on unaudited actuals, while prior years are supported by audited financial reports. Over these years, VMH has demonstrated a stable financial position by successfully meeting and exceeding the 4% reserve requirement in its Memorandum of Understanding with the SCCOE.

VMH's total revenues increased steadily from \$2.4 million in FY 2017-18 to a high of \$6.1 million in FY 2021-22, reflecting both modest enrollment growth and the infusion of one-time state and federal COVID-19 relief funding, including Elementary and Secondary School Emergency Relief (ESSER), Learning Loss Mitigation Funds (LLMF). These one-time funds supported increased operational needs during the pandemic, including expanded staffing,

continuity of learning efforts, personal protective equipment, and facility modifications to maintain safe school environments. Revenues declined in FY 2022-23 and FY 2023-24 due to VMH operating across three different sites. However, revenues rebounded to \$6.4 million in FY 2024-25 following VMH's transition to its permanent facility.

Similarly, total expenses increased from \$2.2 million in FY 2017-18 to \$6.8 million in FY 2024-25, with larger increases beginning in FY 2021-22 as operational costs grew and pandemic-related support phased out. VMH generated operating surpluses in each year from FY 2017-18 through FY 2022-23, with annual net income ranging from \$122,281 to \$992,014. Despite all other challenges, these surpluses allowed VMH to build and sustain strong reserves.

Beginning in FY 2023-24, however, VMH experienced two consecutive years of deficits. The school reported an operating loss of approximately \$228,220 in FY 2023-24, followed by an additional deficit of \$369,883 in FY 2024-25. These negative operating results were driven by strategic investments in curriculum to stabilize VMH programs after transitioning to a permanent facility, as well as by marketing enrollment campaigns, among other initiatives. Despite these recent deficits, VMH's deficit spending was covered by the reserves accumulated in the prior years.

As of June 30, 2024, VMH reported an audited reserve balance of \$3.2 million, representing 56% of its total expenses. The Independent Auditor's Report for the Year Ending June 30, 2024, issued an Unmodified Opinion on VMH's financial statements and its State and Federal compliance. The audit included several findings. First, the auditor identified deficiencies or material weaknesses in internal controls over financial statements and compliance for fiscal year 2023-24; however, this audit finding was issued at VCBLA (network) and not specific to VMH. In response, VCBLA implemented updates to its year-end closing procedures to ensure all financial transactions are accounted for in accordance with Generally Accepted Accounting Principles (GAAP). Second, VMH was required to return \$68,475 to CDE for failing to meet the Educator Effectiveness (EE) Grant reporting the required deadline. Third, VMH was required to return \$11,879 due to noncompliance with missing Independent Study (IS) agreements for students participating in IS. This is a repeat finding from the prior year. Fourth, VMH was required to return \$6,080 for failing to meet the Transitional Kindergarten (TK) class enrollment requirement of no more than 24 students.

Despite these findings, VMH has consistently fulfilled its obligations to submit all fiscal reports required by law and SCCOE in a timely manner.

The Charter Schools Department Staff recommend that VCLBA strengthen its internal review process to ensure all financial transactions are recorded accurately and that proper accrual procedures are applied during the year-end closing. Staff also recommend implementing a system to track required reporting deadlines to prevent delays that could result in the return of funds. In addition, VCBLA must establish and monitor procedures to ensure all independent study agreements are fully completed, including obtaining all required signatures prior to claiming independent study ADA, which requirement affects not only VMH's funding, but its legal and programmatic compliance and soundness. Finally, VMH must maintain compliance with TK class-size and adult-to-student-ratio requirements, which, again, is pertinent not only to VMH's funding, but also its legal and programmatic compliance and soundness.

*VMH Charter School*

		Object 13: VMH Historical Financial Summary <sup>1</sup>							
		2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
[A]	Total Revenues	2,397,756	3,206,146	3,862,894	4,689,500	6,115,007	5,193,757	5,606,991	6,466,822
[B]	Total Expenses	2,275,475	2,673,524	3,375,456	3,699,150	5,122,993	5,060,978	5,835,211	6,836,705
[C] = [A - B]	Net Income (Loss)	122,281	532,622	487,438	990,350	992,014	132,779	(228,220)	(369,883)
[D]	Net Assets Released from Restriction	(5,708)	(119,292)						
[E]	Beginning Fund Balance	366,443	483,016	896,346	1,383,784	2,374,134	3,366,148	3,498,927	3,270,707
[F]	Adjustment to Beg. Fund Balance	-	-	-	-	-	-	-	
[G] = [(E+F)+(C+D)]	Total Net Assets, End of Year	\$ 483,016	\$ 896,346	\$ 1,383,784	\$ 2,374,134	\$ 3,366,148	\$ 3,498,927	\$ 3,270,707	2,900,824
[H] = [G/B]	Fund Balance %	21%	34%	41%	64%	66%	69%	56%	42%

1. Source of Data: Audited Financial Reports for FY 2017-18 - 2023-24. FY 2024-25 is based on Unaudited Actuals  
Row[C] is a change in net assets without donor restrictions

### **Demographic Data**

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

In Objects 14 and 15, a comparison of the average Distance from Standard (DFS) academic assessment scores is made between students who left VMH and the students remaining at VMH. Object 14 reviews the average DFS for students who left after Census Day, and Object 15 reviews the data for the students who left VMH at the end of the year and did not return but could have for the following school year. This does not include students who would age out of the school. Based on the aggregate data from CDE, students who leave VMH are not students who appear to have been counseled out based on lower academic performance, as the average DFS in academic assessments for students leaving VMH or not returning to VMH are higher than or comparable to the students remaining at VMH. Further, the student enrollment numbers for the students who left VMH are for all grades, whereas the number of students tested only includes grades 3-8, as those are the grade levels tested at VMH. Further, there was no Dashboard data in 2020-21 or 2021-22 due to the cancelation of statewide testing because of COVID-19.

**SPACE LEFT INTENTIONALLY BLANK**

**Object 14: Comparison of Average DFS for Students Who Left VMH After Census Day and VMH 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 VMH	DFS Average for Students who left VMH	DFS Average for Students Remaining at VMH
2018-19	ELA	13	262	4.96	0	NULL	-37.7
2018-19	Math	13	262	4.96	0	NULL	-4.7
2019-20	ELA	21	322	6.52	4	-44.25	-23.4
2019-20	Math	21	322	6.52	4	18.5	-4.7
2022-23	ELA	21	300	7	10	-39.3	-40.7
2022-23	Math	21	300	7	10	-80.60	-48.2
2023-24	ELA	21	295	7.12	7	-22.14	-55.5
2023-24	Math	21	295	7.12	7	-46.57	-71.5

**Object 15: Comparison of Average DFS for Students Attended VMH for at Least 90 days and Did Not Return the Following Year and VMH 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 VMH	DFS Average for Students who left VMH	DFS Average for Students Remaining at VMH
2018-19	ELA	20	208	9.62	0	NULL	-37.7
2018-19	Math	20	208	9.62	0	NULL	-4.7
2019-20	ELA	21	262	8.02	4	-62	-23.4
2019-20	Math	21	262	8.02	4	-15.25	-4.7
2022-23	ELA	132	407	32.43	64	-46.97	-40.7
2022-23	Math	132	407	32.43	64	-61.84	-48.2
2023-24	ELA	26	300	8.67	14	0.5	-55.5
2023-24	Math	26	300	8.67	14	2.5	-71.5

**REVIEW OF THE CHARTER PETITION**

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

**1. Sound Education Program**

The VMH Renewal Petition asserts that its instructional program is built on research-based pedagogical principles, integrating Common Core State Standards (CCSS), Next Generation Science Standards (NGSS),

and culturally responsive practices to support all students, particularly English Learners (ELs) and socioeconomically disadvantaged populations. Key instructional strategies include dual-language immersion to promote biliteracy and cultural competency, systematic English Language Development (ELD) for language acquisition, and a balanced literacy approach emphasizing reading and writing proficiency by third grade. Additionally, VMH employs Understanding by Design (UbD) for interdisciplinary project-based learning, cooperative learning structures, and differentiated instruction tailored to meet diverse student needs.

Technology integration is a cornerstone of VMH's instructional design, with students expected to use digital tools for communication, collaboration, critical thinking, and problem-solving. Classrooms employ blended learning models, incorporating technology-enhanced activities such as adaptive learning programs, research projects, and digital presentations. The school claims its instructional strategies foster critical thinking, academic rigor, and a college-bound mindset by embedding reflective and transformational practices into daily teaching and learning processes presented through a research-based, dual Spanish language immersion program. Which is the model across the Voices network. Students in Transitional Kindergarten/Kindergarten are presented curriculum in an 80/20 setting – Spanish (Language 1 or L1) 80% and English (Language 2 or L2) 20%. Each year the percentage shifts until the 3rd grade instruction is 50%/50% L1/L2. This 50/50 breakdown is addressed in both the content areas taught and by staff following an isolated language process – adult models which language is being worked in at the moment. During the renewal site visit, students and staff easily shifted from one language to the other with ready fidelity to the different language instruction. Students and staff were consistent in the L1/L2 percentage of usage, and parents reflected on how their students' skills in both languages have demonstrated significant growth at home.

#### **Students Performing Below Grade Level:**

The Renewal Petition describes VMH's Response to Intervention Program and uses an evidence-based, tiered model of response, including intercession, afterschool programing, and summer school. Embedded within the Dual Immersion program for instruction are strategies providing individual and small group support within the instructional day to provide more focused instruction for struggling students. A reading interventionist was also added to provide additional small group instruction. Each classroom has more than one adult support, thus allowing for increased individual support.

#### **Special Education:**

VMH has 10.4% of its students identified as eligible for special education services. All these students are eligible under the mild-moderate range, as follows:

#### ***Object 16: 2025-26 Types of Disabilities Served by VMH***

<b>Type of Disability</b>	<b>Percentage</b>
Specific Learning Disability (SLD)	20%
Speech or Language Impairment (SLI) only	15.7%
Autism	0.6%
Hard of Hearing (H/H)	0.1%
Other Health Impairment (OHI)	20%
SLI with a secondary disability	22.9%



The students are fully integrated into the general education environment and are supported by a full-time credentialed special education teacher, with services provided within small group push-in or pull-out programs. VMH is part of the Sonoma Special Education Local Planning Area (SELPA), and special education staff are provided professional development and support from the SELPA, and its Charter Management Organization (CMO) administration. VMH is pursuing options to change its SELPA to El Dorado Charter SELPA. VMH was notified that its application to El Dorado Charter SELPA was granted.

**Object 17: 2024-25 Special Education Enrollment by Program Setting for VMH and Comparison Schools and District and State**

	VMH	MHUSD	Walsh	San Martin/ Gwinn	Barrett	State
<b>Special Education Enrollment</b>	35	1,045	49	88	83	865,213
<b>Regular Class 80% or More of the Day</b>	100%	61.1%	65.3%	61.4%	51.8%	60.1%
<b>Regular Class 40-79% of the Day</b>	0.0%	21.2%	8.2%	12.5%	6.0%	14.3%
<b>Regular Class 39% or Less of the Day</b>	0.0%	10.4%	24.5%	21.6%	39.8%	16.8%
<b>Separate School &amp; Other Settings</b>	0.0%	1.1%	0.0%	1.1%	0.0%	2.6%
<b>Preschool Setting</b>	0.0%	6.1%	2.0%	3.4%	2.4%	6.3%
<b>Missing/Unknown</b>	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

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

**English Learners (EL):**

The Renewal Petition describes a process in structuring a dual immersion program. The tenets of the 80/20 split for language of instruction are present across all grade levels and different school environments. There are specifically designated times across the day when English Language Learners and Spanish Language Learners are regrouped and discrete intervention and support are provided according to needs. Anchor charts are created based on language instruction and assessments are provided in the language of instruction to better assess student progress, as at VMH, 55.6% of the students have been identified as English Learners.

VMH has established an English Learner Advisory Committee (ELAC) to provide instructional support to parents regarding supporting their English Language Learner. During the site visit, VMH shared it is considering creating a Spanish Language Advisory Committee (SLAC) to better support the parents of students learning Spanish as well.

**Educational Leadership**

There are inconsistencies between the Charter narrative regarding employment qualifications and the job descriptions included in Appendix O (which, like the other appendices, is a part of the Renewal Petition and incorporated therein), specifically including the Principal Bilingual position, with multiple

required (and essential) qualifications listed in Appendix O but inadvertently omitted from the body of the Charter. CSD Staff analyzed the Renewal Petition as a whole, including the qualifications specified in Appendix O, and required employment qualifications identified in the Appendix O are essential to Staff's analysis and recommendations and the 2025 MOU or the 2018 MOU and 2022 Addendum and an addendum to the applicable MOU (hereinafter referred to as "the MOU and/or an addendum thereto") must explicitly acknowledge that those requirements are part of the minimum qualifications for the identified positions per the Charter.

The principal is the educational and instructional leader at VMH, in addition to being responsible for teacher supervision, evaluation, and providing input and approval of each faculty and staff member's Goals. Per the expanded description of required qualifications for the position in Appendix O, the VMH principal position requires a California Multiple Subject Clear Credential with Bilingual Authorization teaching credential or "out of state credential." The lack of a California teaching credential with Bilingual Authorization for a person holding this position could negatively impact the quality of educational services provided to VMH students, is contrary to the job duties and requirements of the principal position in this bilingual immersion school, and requiring California 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 VMH administrators "cover" classes for teachers when a substitute is not available, they are required to hold a teaching credential, or at least a substitute credential, therefore "an out of state credential" in and of itself is insufficient. This is particularly important because during the charter term, VMH has continued to struggle with finding and retaining qualified teaching staff, which has, in turn, required VMH administrators to provide teaching coverage, and such coverage must be provided by persons who have appropriate credentials, including Bilingual Authorization, or the VMH 80/20 bilingual immersion program cannot be implemented with fidelity.

The job duties for the Principal Bilingual (Spanish/English) position, as specified in Appendix O of the Charter, include, but are not limited to the following:

- Develop and implement a school-wide and individual staff development plan and provides ongoing support and coaching to teachers to help them meet their individual professional development plan goals; plan, lead, and conduct staff professional development and staff meetings.
- Serve as the schools' [sic] instructional leader, including ensuring that the school mission and instructional program are being effectively implemented in each classroom.
- Continuously observes the instructional program and provides the CEO with regular evaluations of school programs and student progress.
- Study the curriculum and make decisions regarding the course of study, major changes and time schedules, and sound programs.

A principal with an out-of-state credential rather than a California credential with Bilingual Authorization, would not be appropriately qualified and able to carry out these functions, which require intimate knowledge and qualifications to understand, implement, and instruct students in VMH's bilingual immersion model, including the ability to both speak and teach in Spanish. It also would be impossible for a person without the appropriate qualifications to evaluate the bilingual teaching staff. As such, CSD Staff recommends that, as a condition of renewal, the principal job qualification be required to be updated through the MOU and/or an addendum thereto to require, at minimum, a California multiple subject clear credential with Bilingual Authorization, and not permit the use of only an out-of-state credential.

## **Independent Study and TK Staffing Violations**

As noted above, VMH was required to return \$11,879 in funding due to noncompliance with missing IS agreements for students participating in IS. This was a repeat finding from the prior year. VMH was also required to return \$6,080 for failing to meet the TK class enrollment requirement of no more than 24 students. VCBLA must establish and monitor procedures to ensure all independent study agreements are fully completed, including obtaining all required signatures prior to claiming independent study ADA, which requirement affects not only VMH's funding, but its legal and programmatic compliance and soundness. VMH must also comply with TK class-size and adult-to-student-ratio requirements, which, again, is pertinent not only to VMH's funding, but also its legal and programmatic compliance and soundness.

The Charter Schools Department Staff concluded the VMH Renewal Petition provides sufficient information to substantiate the required elements for a sound educational program, so long as the principal job qualifications are adjusted, and VMA specifies its methods for ensuring compliance with IS agreement requirements and TK class size and adult-to-student ratio requirements as part of the MOU and/or an addendum thereto .

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

Staff found facts demonstrating the Petitioners are likely to successfully implement the program only if VMH resolves the other identified concerns and conditions through the MOU and/or an addendum thereto, as described more fully throughout this Staff Analysis and Findings of Fact.

### **3. Affirmation of each of the conditions required by statute**

SCCOE Staff found the Petition contains the required affirmations.

### **4. Reasonably comprehensive description of the required elements**

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

The Charter Schools Department Staff found, as detailed below, that additional specificity and requirements governing VMH'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 thereto. It is necessary to CSD Staff's determination that the description of an element is reasonably comprehensive that the parties enter into the MOU and/or an addendum thereto to address current requirements and best practices (including those updated/addressed by the 2025 MOU). That expectation informs and should be interpreted as applicable to the analysis of whether the Renewal

Petition includes a reasonably comprehensive description of each element and the analysis and recommendations regarding the MOU and/or an addendum thereto informing, supplementing, and or being required in order for the description of each element to be reasonably comprehensive.

In preparing the Renewal Petition, VMH appears to have overlooked some updates. For example, failing to fully update the petition to designate the County as the authorizer and including verbiage regarding Voices College-Bound Language Academy at West Contra Costa (VWCC). This Staff Analysis will not detail each of these omissions and concerns, but SCCOE Staff recommend that the SCCBOE, as a condition of renewal, require VMH to address these corrections, oversights, and omissions.

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

The above discussion of whether the educational program is sound is incorporated herein by this reference. As stated above, VMH has an 80/20 dual language Spanish immersion program. While the Renewal Petition describes and details the research and theory behind what constitutes a sound dual immersion program, the school and staff have been much more focused on gaining meaningful experience in teaching and setting up coherent classroom/instructional environments. VMH's professional development plan considers these two challenges and delicately balances CMO versus site level priorities. CSD staff do see growth in the fundamentals of teaching and are heartened by the directions that the Network Administrators are taking to provide appropriate professional development opportunities for the teaching staff. Parents have a significant level of trust with VMH staff that amplifies the learning process and helps offset the challenge of the teachers' experiential gaps as many VMH teachers are new teachers or are currently in their credential programs.

The Charter Schools Department Staff believe that this section of the Petition includes a reasonably comprehensive description, subject to the notes and recommended requirements above regarding the soundness of the educational program.

**B. Element Two: Measurable Student Outcomes**

VMH'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.

VMH'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, VMH commits to continually updating its goals and performance expectations to reflect the evolving needs of students and state requirements.

The Charter Schools Department Staff believe this section 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, VMH utilizes several standardized assessments. These include the Smarter Balanced Assessments for English Language Arts, Mathematics, and Science, and the California Standards Test for Science for fifth graders. English Learners are assessed annually through the English Language Proficiency Assessments for California (ELPAC).

Assessment data is integral to driving instruction at VMH. 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 the chartering authority and other relevant entities through formal reports.

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

**D. Element Four: Governance Structure**

In accordance with Education Code Section 47604, all Voices College-Bound Language Academy campuses will be operated by VCBLA, a California non-profit public benefit corporation with 501(c)(3) status. Voices is governed by a Board of Directors (“the Board”) pursuant to its corporate bylaws as adopted and subsequently amended from time-to-time, which shall be consistent with the Charter. Board meetings are held in accordance with the Brown Act.

Interviews with the parents, as part of the annual visit, confirm their active participation and their willingness to lend their voice to the CMO level regarding the uniqueness of their school. Per the Bylaws, at least two seats on the Board are reserved for parents of current students at a VCBLA charter school (and CSD Staff note that any proposed change to reduce the number of seats reserved for parents would constitute a material revision to the Charter). VCBLA has established a Schools Advisory Committee comprised of at least one parent leader from each charter school in the network to communicate local issues at the organizational level and serve as advisors to the Board. VMH has established an English Language Advisory Committee (ELAC) and the Voices Parent Advisory Committee (VPAC), both of which meet several times throughout the year. In addition, there are a variety of ways that allow more informal opportunities for parents to interact and engage with VMH staff, i.e., tutoring, homework center, parenting classes, parent workshops, cafecitos, etc. The Renewal Petition specifies that VCBLA 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 the Board has adopted a Conflict of Interest (COI) Code that has been approved by the Fair Political Practices Commission, as Voices operates in more than one county in California. The COI included in the Renewal Petition (including in appendix section M) is the original, now outdated, COI Code. As part of the annual review, Voices has submitted a more recent version as well as the 2024 Multi-County Agency Biennial Notice

for the COI. The most recent COI Code was approved on February 7, 2020, and at all times VMH and VCBLA are required to comply with the current adopted and FPPC approved COI Code, notwithstanding the error in attaching an outdated version to the Renewal Petition.

In accordance with the Political Reform Act and the COI Code, all VCBLA Board members, as well as the designated Voices CMO leadership and VMH leadership, are required to file a “Form 700” Statement of Economic Interests annually disclosing specified interests. During the charter term, SCCOE staff have reviewed the Forms 700 filed on behalf of Voices reporters and found that directors or staff have identified reportable interests as required.

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

The governance element in the Renewal Petition is quite brief and is also necessarily supplemented by the MOU and/or an addendum thereto in order to be consistent with applicable law and SCCOE expectations and best practices, and there is an inconsistency on the number of consecutive terms that may be served by an SCCOE representative to the VCBLA Board. CSD Staff note that the 2018 MOU and 2022 Addendum both required updates to the VCBLA Bylaws that are not included in the Bylaws attached in appendix M to the Renewal Petition, and the Renewal Petition description is also inconsistent with the current Bylaws. CSD Staff recommends, as a condition of this renewal, VCBLA be required to update the Bylaws to address those existing requirements as well as any additional requirements in the MOU and/or an addendum thereto, and first provide a copy of the proposed revisions to CSD Staff to ensure compliance prior to the VCBLA Board approving the revisions.

The Charter Schools Department Staff believe this section, as supplemented by the MOU and/or an addendum thereto, includes a reasonably comprehensive description, on the condition the Bylaws are required to be updated as a condition of renewal.

**E. Element Five: Employee Qualifications**

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

VMH began operation with predominantly first year teaching staff, and it has continued to work diligently with SCCOE Human Resources to make sure that the teaching staff are enrolled in Teacher Credentialing Programs and fulfilling all the legal requirements for them to perform as teachers while they acquire both academic and experiential skills. During the charter term, VMH has continued to struggle with finding and retaining qualified teaching staff, however, has made significant strides to create credential pathways and opportunities for VMH teaching staff. During the 2025-26 annual credential review, VMH had all teaching staff with appropriate

certificates, permits, or documentation required for the teaching assignment. Further, all staff meet the current requirements for instruction in a dual immersion classroom.

This element of the Charter is required to include the minimum qualifications for the various job positions at VMH. However, as noted above, the narrative description in the body of the Renewal Petition itself omits important/essential qualifications, but this description is supplemented by the required qualifications for various job positions as specified in Appendix O. As such, CSD Staff's analysis and recommendations are based on a review of the qualifications in the body of the Renewal Petition and Appendix O together. Without the supplemental information in Appendix O, this element of the Charter would not be reasonably comprehensive as essential qualifications would be omitted. As such, the MOU and/or an addendum thereto should make explicitly clear that the required qualifications from the positions in Appendix O are incorporated and specifically part of the minimum qualifications in this element of the renewal Charter.

As noted above, CSD Staff is concerned that the principal position permits an out-of-state credential, which may negatively affect the educational program and the principal's ability to cover a classroom when necessary and/or conduct their essential job functions. CSA Staff recommend that VMH be required, as a condition of renewal, to update this requirement to require a California Multiple Subject Clear Credential with Bilingual Authorization.

The Renewal Petition specifies that teacher credentials will be maintained and available for inspection at the CMO office, but Education Code Section 47605(l) requires that these documents be maintained on file at the charter school, so VMH must maintain copies on site for SCCOE inspection.

The Charter Schools Department Staff believe this section includes a reasonably comprehensive description on the condition that the qualifications for the principal position be updated through the MOU and/or an addendum thereto and that the MOU and/or an addendum thereto specifically incorporate the required qualifications from Appendix O as minimum qualifications for each job position and also adopt the "preferred qualifications" from Appendix O as ongoing preferred qualifications for each position.

**F. Element Six: Health and Safety**

The legal requirements in the Charter Schools Act governing the adoption of a school safety plan per this element were revised, effective September 20, 2025, specifically relative to the requirements related to a school safety plan and the addition of Education Code Section 47606.3 governing annual review and update of that plan, but VMH's Renewal Petition did not include revisions specifically to acknowledge that change. This change should be memorialized pursuant to the MOU and/or an addendum thereto.

The Renewal Petition specifies that VMH maintains and regularly reviews and updates Board-approved policies and procedures to ensure the health and safety of students and staff. VMH provided an overview of Health and Safety Policies and Procedures and the process for employee fingerprinting and background checks. All staff are expected to comply with Ed. Code 47605(c)(5)(f), Education Code Section 44691, and all other legal requirements, and VMH states it is committed to providing a safe, compliant working environment. VMH submitted its 2024-25 Comprehensive School Safety Plan and declared that VMH 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 VCBLA Board annually for approval to ensure ongoing compliance with state and federal laws and regulations. VMH 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 2025 MOU also includes a variety of health and safety and related compliance commitments that VMH must affirm it will meet per the MOU and/or an addendum thereto. While the Charter is not required to list every applicable law, and VMH remains obligated to comply with legal mandates, CSD Staff notes the Renewal Petition does not specifically refer to compliance with Title IX, including adoption and maintenance of appropriate policies and compliance with all training requirements, the requirements regarding background checks and reporting pursuant to AB 848, and compliance with the requirements for a transportation safety plan, which it should commit to via the MOU and/or an addendum thereto.

The Charter Schools Department Staff believe this section, including the supplementation provided by the MOU and/or an addendum thereto, includes a reasonably comprehensive description.

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

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

Object 18, below, demonstrates that VMH's student demographic distribution is not largely reflective of the surrounding Morgan Hill Unified School District (MHUSD) nor the schools that VMH students would otherwise have attended. The Hispanic or Latino population at VMH is 95.6%, substantially higher than the 52.5% at MHUSD, and the Asian population is somewhat lower at VMH (2.7%) compared to MHUSD (8.5%). VMH is specifically serving a traditionally underserved population, which correlates with the intent of the Charter School Act.

Object 19, below, highlights differences in student group populations between VMH, MHUSD, and the schools VMH students would otherwise have attended. Notably, VMH has a significantly higher percentage of ELs at 55.6% compared to 15.3% in MHUSD, and slightly higher percentages to other comparison schools. However, VMH's SWD population is lower at 10.4% compared to 12.6% in MHUSD and the even higher percentage at comparison school Barrett (22.2%). The SED population at VMH, at 71.6%, is significantly higher than MHUSD's 38%, and slightly higher than Walsh (69.9%) and Barrett (67.9%).

**SPACE LEFT INTENTIONALLY BLANK**



**Object 18: Comparison of 2024-25 Demographic Data Among VMH, MHUSD, and Schools VMH Students Would Otherwise Have Attended**

	Hispanic or Latino	Asian	Filipino	White	African American	Two or More Races
<b>VMH</b>	95.6%	2.7%	0.0%	0.6%	0.3%	0.0%
<b>MHUSD</b>	52.5%	8.5%	2.3%	25.1%	1.3%	6.4%
<b>Walsh</b>	77.2%	3.1%	0.6%	10.9%	1.4%	3.3%
<b>San Martin/Gwinn</b>	79.8%	1.1%	0.2%	12.3%	0.2%	3.0%
<b>Barrett</b>	68.2%	5.1%	1.9%	12.8%	2.9%	4.3%

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

**Object 19: Comparison of 2024-25 Student Group Data Among VMH, MHUSD, and Schools VMH Students Would Otherwise Have Attended**

	Total Number of Students	SED	EL	SWD
<b>VMH</b>	338	71.6%	55.6%	10.4%
<b>MHUSD</b>	8,483	38.0%	15.3%	12.6%
<b>Walsh</b>	359	69.9%	43.5%	13.4%
<b>San Martin/Gwinn</b>	643	58.3%	37.6%	13.4%
<b>Barrett</b>	374	67.9%	27.0%	22.2%

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

VMH's recruitment plan outlines broad strategies to attract a student population reflective of MHUSD. 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 VMH's recruitment is on person-to-person engagement, including holding focus groups with parents and community organizations, distributing promotional materials, conducting community events at various times, cultivating relationships with local community members, and employing staff from the local area to lead recruitment efforts.

**Object 20: VMH Demographic Data from 2017-18 to 2024-25**

	Total Number of Students	Hispanic or Latino %	Asian %	Filipino %	White %	African American %	Two or More Races %
<b>2017-18</b>	186	97.4	0.0	0.0	2.2	0.0	0.5
<b>2018-19</b>	247	97.2	0.0	0.0	2.4	0.0	0.4
<b>2019-20</b>	309	97.4	0.0	0.3	1.9	0.3	0.0
<b>2020-21</b>	363	97.8	0.3	0.3	1.4	0.3	0.0
<b>2021-22</b>	392	98.2	0.5	0.3	1.0	0.0	0.0
<b>2022-23</b>	289	97.9	1.0	0.3	0.7	0.0	0.0
<b>2023-24</b>	289	96.5	1.4	0.3	1.0	0.7	0.0
<b>2024-25</b>	338	95.6	2.7	0.0	0.6	0.3	0.0

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

**Object 21: VMH Student Group Data from 2017-18 to 2024-25**

	Total Number of Students	Percentage of SED	Percentage of EL	Percentage of SWD
<b>2017-18</b>	186	84.4	74.7	12.9
<b>2018-19</b>	247	78.5	70.0	14.2
<b>2019-20</b>	309	75.7	61.8	12.0
<b>2020-21</b>	363	71.3	55.6	11.8
<b>2021-22</b>	392	78.1	60.5	11.0
<b>2022-23</b>	289	64.7	59.9	9.0
<b>2023-24</b>	289	76.5	63.0	8.3
<b>2024-25</b>	338	71.6	55.6	10.4

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

Object 20, above, shows that VMH’s racial and ethnic demographic composition has remained relatively stable from 2017-18 to 2024-25, particularly for the Hispanic or Latino population, which consistently represents most students. The Hispanic or Latino percentage has ranged from 95.6% to 98.2%, with the most recent year (2024-25) showing 95.6%. The other demographic groups vary from year-to-year as various families move in and out of the school.

Object 21, above, indicates that the EL population at VMH has fluctuated over the years with a range of 74.7% to 55.6%; currently EL is 55.6%. The percentage of SWD has also fluctuated with a range of 14.2% to 8.3%, currently SWD is 10.4%. In 2023-24, the SWD population was 9.5%. The percentage of SED students fluctuated, staying between 64.7% and 84.4%, with a current level of 71.6%. These data points reflect a consistently high-need student population, particularly in terms of SED and EL students, which comports with the intent and purposes of the Charter Schools Act.

The Charter specifies that Voices will “document its outreach efforts and analyze the information to evaluate whether we have met our enrollment targets” and “utilize this information to refine its outreach efforts to ensure that the Voices student body reflects the general population of the district with regard to racial and ethnic, EL students, and student with disabilities balance.” CSD Staff appreciates that the Renewal Petition acknowledges the necessity of ongoing review and refinement of this plan and VMH’s recruitment efforts. Consistent with SCCOE’s best practices and expectations for charter schools, VMH should be required to commit to conducting this analysis and update process at least annually taking account of the results of the most recent open enrollment process.

The Charter Schools Department Staff believes this section includes a reasonably comprehensive description only if VMH commits through the MOU and/or an addendum thereto to the ongoing work, review, and updates to its plan as described above.

**H. Element Eight: Admissions Policies and Procedures**

VMH 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.

## *VMH Charter School*

With the changes to the Charter Schools Act since VMH's most recent renewal, the actual policies and procedures for admission – including how VMH implements the admission preferences, conducts the public random drawing (lottery) admission procedures, adds students to the waitlist, and offers them admission from the waitlist – must also be included in the Renewal Petition. VMH has updated the Renewal Petition to include these items.

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

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

1. Students currently enrolled at the Charter School
2. Siblings of students already enrolled or admitted into the Charter School
3. Children of teachers or staff, not to exceed 10% of the total Charter School enrollment
4. Students who reside in the district

The previously approved preferences that are currently in effect are:

With the exception of the following students, who are guaranteed admission in the following school year:

- Students currently enrolled at the Charter School
- Siblings of students already enrolled or admitted into the Charter School
- Children of teachers or staff, not to exceed 10% of the total Charter School enrollment

Admission preferences in the case of public random drawing shall be given to the following students in the following order:

- Students who reside in the district
- Students who qualify for free or reduced-price meals

The revisions to provide for admissions preferences rather than exemptions (other than for current students who are guaranteed ongoing enrollment and are, thus, exempt from the lottery process), as previously provided, are appropriate. VMH has not specified its reason(s) for seeking the revised preferences, whether to approve any or all the requested preferences, other than the preference for residents of MHUSD, is within the discretion of the SCCBOE, per *EC* Section 47605(e)(2)(B). If the County Board does not approve all the preferences, VMH would be required to revise this provision of the Charter and its admission policies and procedures accordingly. CSD Staff and VMH discussed and agreed that the preference for students who qualify for free or reduced-price meals to not be removed as a preference to ensure that VMH continues to serve traditionally underserved students, therefore, the preferences being requested by VMH are as follows:

1. Students currently enrolled at the Charter School
2. Siblings of students already enrolled or admitted into the Charter School
3. Children of teachers or staff, not to exceed 10% of the total Charter School enrollment
4. Students who reside in the district
5. Students who qualify for free or reduced-price meals

VMH currently has as its first preference siblings of students who are currently enrolled at VMH. The preferences proposed by VMH seek to expand the sibling 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 VMH in 2026-27 has a sibling apply during the open enrollment process for admission for 2027-28 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 VMH in 2026-27 both apply for admission for 2027-28, 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 VMH 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. CSD Staff recognizes the benefits of allowing families to enroll all of their children at the same school, so recommends the SCCBOE approve the preferences as proposed by VMH, including the addition of the preference for siblings of students who are admitted to VMH, with the proviso that the preference for siblings of students who are “admitted” to (as opposed to already enrolled in) VMH only be permitted if VMH is able to detail through the MOU and/or an addendum thereto, to the County Superintendent or designee’s satisfaction, specifically the process of how it would be applied in practice – 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.

This element of the Charter is also supplemented by the provisions of the current MOU and/or the 2025 MOU addressing the permissible contents of the application for admission, which continue to be necessary to VMH’s operations. VMH has also updated this provision of the Charter to reflect changes to the law since its Charter was last renewed.

The Renewal Petition specifies that after the initial open enrollment and lottery process, VMH will accept additional applications and “conduct subsequent public random drawing(s) and place students at the end of the waiting list in the order drawn.” It does not specify when or under what circumstances such subsequent lotteries will be held. CSD Staff recommends that VMH be required to clarify through the MOU and/or an addendum thereto whether it will, in fact, hold multiple lotteries in a given year, and, if so, the circumstances under which it holds subsequent lotteries.

CSD Staff further recommends that it be clarified through the MOU and/or an addendum thereto that students in a capped preference group shall be included in the public drawing and, if necessary, placed on the waitlist, both within that capped preference group and within the next highest noncapped lower-level preference group for which the student also qualifies so their opportunity for admission is not limited by the cap on a higher level preference group. Additionally, it should be clarified through the MOU and/or an addendum thereto that in no event shall a student who submitted their application after the close of the Open Enrollment Period and did not participate in the public random drawing be offered admission or placed on a waitlist above any student who participated in the public random drawing for admission, regardless of whether the applicant would or would not qualify for one of the admission preferences granted during the Open Enrollment Period and public random drawing. In the case

of openings after the initial offers of admission at the time of the public random drawing, students shall be offered admission in strict accordance with their position on the wait list as established during the public random drawing and students shall not be moved up or down on the waitlist once placed thereon other than as a result of applicants ahead of them on the waitlist being offered admission or withdrawing from the waitlist.

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 and preferences are clarified, as described above.

**I. Element Nine: Financial Audit**

VMH states in the Renewal Petition that the audit will be conducted in accordance with Education Code Sections 47605(b)(5)(l) and 47605(m), generally accepted accounting procedures, and with applicable provisions within the California Code of Regulations governing audits of charter schools as published in the State Controller's K-12 Audit Guide. The Renewal Petition describes VMH 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. VMH has a finance committee that selects an independent auditor.

The Renewal Petition incorrectly states, "Any disputes regarding the resolution of audit exceptions and deficiencies are referred to the dispute resolution process contained in this petition." The Charter Schools Act specifies that audit exceptions and deficiencies must be resolved to the satisfaction of the chartering authority. As such, VMH is required to resolve exceptions and deficiencies to SCCOE's satisfaction and any disputes over such resolution would only be submitted to the dispute resolution procedure in SCCOE's sole discretion.

The Charter Schools Department Staff believe that this section includes a reasonably comprehensive description with the clarification through the MOU and/or an addendum thereto regarding the mandate that audit exception and deficiencies in the SCCOE's discretion.

**J. Element Ten: Student Suspension/Expulsion Procedures**

VMH'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 N to the Renewal Petition, which is attached and fully incorporated by reference into the Renewal Petition. The Charter Schools Act requires the Charter to provide a reasonably comprehensive description of the procedures for suspension and expulsion from VMH. As such, VMH may not substantively revise the causes or procedures, except to comport with requirements of law or to track revisions to the causes and procedures applicable to non-charter California public schools, without a determination from the County Superintendent or designee whether the proposed revision(s) is a material revision to the Renewal Petition. The statement in the Renewal Petition to the contrary, claiming authority for VMH unilaterally to amend these policies and procedures, is incorrect and VMH should be required, as a condition of approval to acknowledge through the MOU and/or addendum thereto the need to obtain a determination from the County Superintendent or designee whether any proposed revision(s) are material.

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

The Charter Schools Department Staff believe this section includes a reasonably comprehensive description, only if the above issue is clarified and corrected through the MOU and/or an addendum thereto.

**K. Element Eleven: Employee Retirement System**

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

The Charter Schools Department Staff believe this section includes a reasonably comprehensive description with the addition through the MOU and/or an addendum thereto of information about the retirement system option for certificated employees who are not eligible to participate in STRS.

**L. Element Twelve: Public School Attendance Alternatives**

MHUSD resident students who choose not to attend VMH may attend other MHUSD schools or pursue an intra- or inter-district transfer in accordance with existing district enrollment and transfer policies. Parents and guardians of each student enrolled in VMH 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 VMH, except to the extent such a right is extended by the local education agency.

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

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

The VMH Renewal Petition addresses return rights of employees of the "school district or County" in accordance with applicable law. However, SCCOE employees are actually employees of the "Santa Clara County Superintendent of Schools." This will need to be clarified in the MOU and/or addendum thereto.

The Charter Schools Department Staff believe this section includes a reasonably comprehensive description but it must be updated through the MOU and/or addendum thereto to reflect the Santa Clara County Superintendent of Schools as the employer of personnel at SCCOE.

**N. Element Fourteen: Dispute Resolution**

The Renewal Petition includes the dispute resolution language from the 2018 MOU and 2022 Addendum, which is reasonably comprehensive, with the provisions covering violations of the

Charter, an MOU with SCCOE, or law, a problem related to the operation of VMH or the SCCOE's oversight obligations, or any dispute arising between SCCOE and the Charter.

The Charter Schools Department Staff believe this section includes a reasonably comprehensive description, though recommends it be required to be fine-tuned through the MOU and/or an addendum thereto be consistent with the SCCOE's most current dispute resolution language.

**O. Element Fifteen: Closure Protocol**

VMH outlines a process to be used if the charter school closes and CSD staff notes and appreciates that VMH incorporated directly into the Renewal Petition the closure protocol language from the 2018 MOU.

The Charter Schools Department Staff believe this section includes a reasonably comprehensive description, though recommends it be required to be fine-tuned through the MOU and/or an addendum thereto be consistent with the SCCOE's most current closure protocol best practices.

**Required Supplemental Information**

CSD Staff reviewed the VMH Renewal Petition, which includes the budget narrative, projected budget, and cash flow for Fiscal Years (FY) 2025-26 through 2030-31. CSD Staff also reviewed supplemental documents and the public hearing information to assess and provide clarification on VMH'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 22 below shows VMH's historical and projected enrollment and Average Daily Attendance (ADA) data. Historical enrollment data indicate that VMH experienced steady growth over several years, increasing from 186 students in 2017-18 to a high of 392 students in 2021-22. This expansion aligns with the VMH phased growth plan, which began with the addition of second grade in FY 2016-17 and continued with the introduction of one new grade level each subsequent year, culminating in full implementation of grades TK through grade 8 by FY 2022-23. However, enrollment decreased to 289 students in FY2022-23.

In FY 2022-23, enrollment declined to 289 students, the year of VMH's material revision and its first year operating across three sites and serving all TK-8 grade levels. This transition year brought logistical challenges and higher than typical grade level attrition, contributing to the decrease. Enrollment remained stable at 289 students in 2023-24 and subsequently increased to 338 students in FY 2024-25 after moving to the VMH permanent facility, which improved operational stability, reduced site-related disruptions, and strengthened both recruitment and retention efforts.

Similarly, VMH's ADA has followed the enrollment trends. Historical ADA increased from 182.62 in FY 2017-18 to 346.70 in FY 2020-21, before declining to 256.94 in FY 2022-23 due to lower enrollment and ongoing post-pandemic attendance challenges. ADA improved slightly to 262.77 in 2023-24 and is projected to continue to increase as VMH stabilizes in its long-term permanent

# VMH Charter School

facility. Additionally, the ADA percentage, which measures the proportion of enrolled students attending daily, ranged historically from 87% to 98%. The renewal petition projects an ADA rate of 97% throughout the multi-year period. While this assumption appears slightly optimistic, given the school's relatively high chronic absenteeism rates. However, VMH plans to address this by implementing an attendance recovery program to support improved student attendance and achieve its projected ADA levels.

Furthermore, Object 23 indicates that the VMH's renewal petition enrollment projections anticipate moderate growth over the next charter term. Enrollment is projected to increase from 338 students in 2024-25 to 451 students by FY 2030-31. The overall five-year projection reflects a net increase of 63 students, or an average annual growth of approximately 13 students, supporting a conservative approach to long-term expansion after the recent facility transition. The grade-level projections indicate moderate growth in lower grades (TK-3), stabilizing the feeder pipeline, while middle grades (6-8) show greater fluctuation.

Overall, VMH's projected enrollment and ADA levels appear reasonable and reflect a return to stability following two years of disruption associated with multi-site operations. However, due to enrollment declines in FY 2022-23 and FY 2023-24, CSD staff recommend that VMH closely monitor both enrollment and ADA and provide CSD with a plan for how VMH plans to implement the attendance recovery program to increase ADA.

Object 22: VMH Historical and Projected Enrollment and ADA <sup>1</sup>														
	Historical Data								Enrollment Projection					
	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
GradeTK	0	0	0	0	0	0	7	22	33	38	40	40	40	40
Grade K	57	62	60	58	56	25	20	23	35	46	52	52	52	52
Grade 1	59	53	57	57	47	37	22	29	26	36	48	52	52	52
Grade 2	42	57	57	58	56	36	38	27	37	27	38	50	52	52
Grade 3	28	44	61	58	54	41	33	47	33	38	28	40	52	52
Grade 4	0	31	43	61	57	32	37	41	49	33	39	29	42	52
Grade 5	0	0	31	40	56	39	31	45	46	50	33	40	31	44
Grade 6	0	0	0	31	38	36	42	25	57	47	51	33	41	32
Grade 7	0	0	0	0	28	26	34	47	27	58	48	52	33	42
Grade 8	0	0	0	0	0	17	25	32	45	28	58	49	52	33
A. Actual Enrollment	186	247	309	363	392	289	289	338						
B. Projected Enrollment									388	401	435	437	447	451
C. Incr/(Decr) in Enrollment <sup>2</sup>	48	61	62	54	29		0	49	50	13	34	2	10	4
D. Enrollment Variance <sup>3</sup>	35%	33%	25%	17%	8%	0%	0%	17%	15%	3%	8%	0%	2%	1%
E. Incr/(Decr) in Enrollment Variance <sup>4</sup>		-2%	-8%	-8%	-9%	-8%	0%	17%	-2%	-11%	5%	-8%	2%	-1%
F. ADA	182.62	237.54	295.23	346.70	340.31	256.94	262.77	316.72	376.36	388.97	421.95	423.89	433.59	437.47
G. ADA % <sup>5</sup>	98%	96%	96%	96%	87%	89%	91%	94%	97%	97%	97%	97%	97%	97%

<sup>1</sup> Historical enrollment data is based on Census Day enrollment and historical ADA is based on P2 ADA.

FY 2025-26 through FY 2030-31 Enrollment and ADA is based on Renewal Petition Projections.

<sup>2</sup> Current Year Enrollment minus Prior Year Enrollment

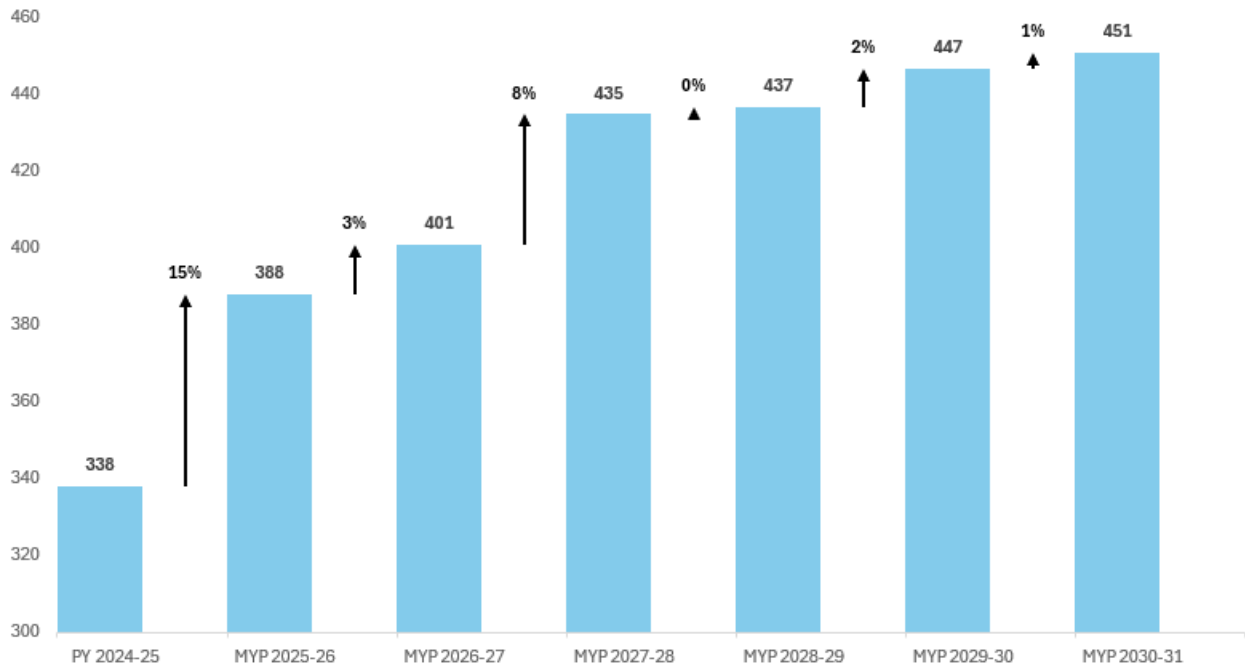
<sup>3</sup> Row C/Prior Year Enrollment

<sup>4</sup> Current Year Enrollment Variance - Prior Year Enrollment Variance (Row D)

<sup>5</sup> Row F/Row A or Row B



**Object 23: VMH Renewal Petition Enrollment Projections**



**Revenues & Expenses**

Object 24, below, presents financial projections for VMH over the next five fiscal years (FY 2026-27 through 2030-31). During this period, VMH projects a positive net income of approximately \$34,000 to \$369,000 annually. These steady surpluses result in consistent growth of its net assets, which are projected to increase from \$2.9 million in FY 2025-26 to \$4.4 million by FY 2030-31.

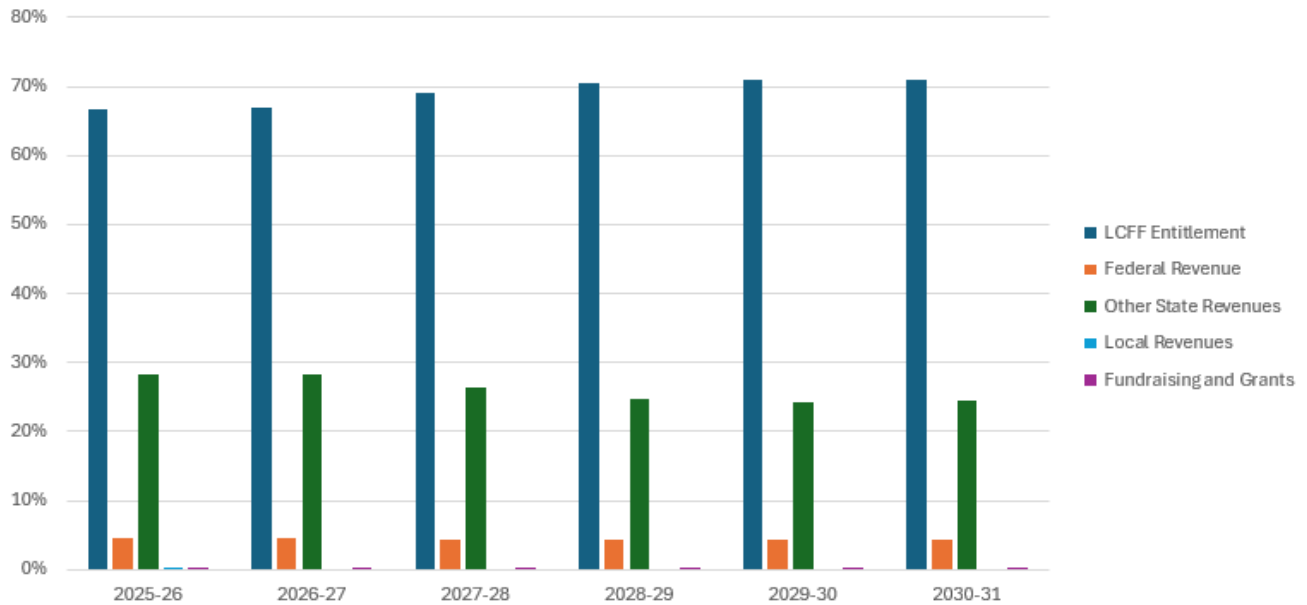
VMH projects maintain a healthy reserve percentage above 40% throughout their renewal term, which is reasonable compared to the historical average of 49% as referred to in object 13 above.

		Object 24: VMH Renewal Petition Multi-Year Projection Summary <sup>1</sup>					
		2025-26*	2026-27	2027-28	2028-29	2029-30	2030-31
[A]	Total Revenues	7,396,917	7,891,427	8,584,137	8,758,713	9,170,981	9,526,727
[B]	Total Expenses	7,362,433	7,701,232	8,239,692	8,479,884	8,816,604	9,157,808
[C] = [A - B]	Net Income (Loss)	34,484	190,196	344,445	278,828	354,377	368,919
[D]	Beginning Fund Balance	2,900,824	2,935,308	3,125,504	3,469,949	3,748,778	4,103,155
[E]	Adj. to Beg. Fund Balance						
[F] = [(D+E) + C]	Total Net Assets, End of Year	\$2,935,308	\$3,125,504	\$3,469,949	\$3,748,778	\$4,103,155	\$4,472,073
[G] = [F/B]	Reserve Percentage	40%	41%	42%	44%	47%	49%

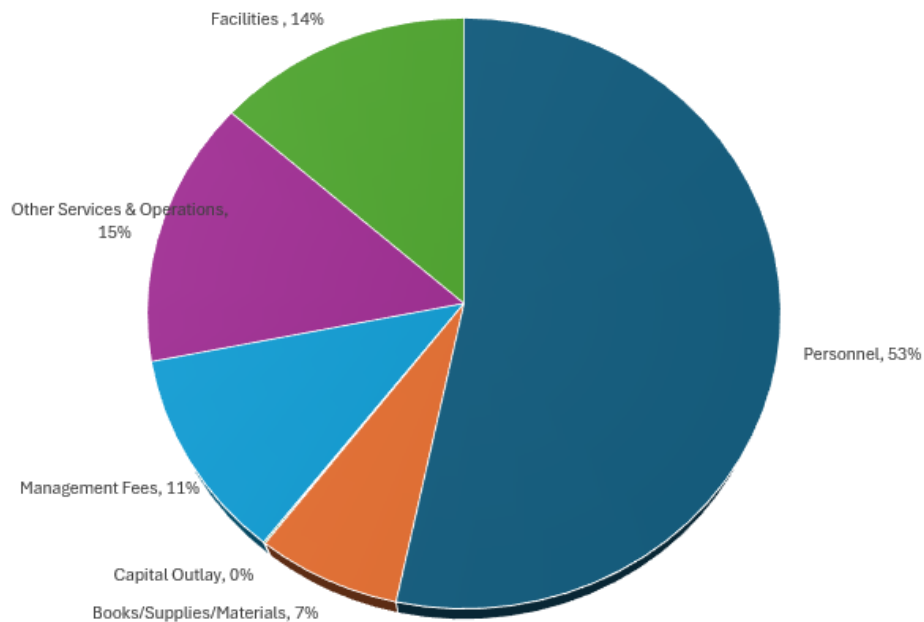
1. Source of Data for \*FY 2025-26 (Current Year), FY 2026-27 - FY 2030-31 (Multi-Year) VMH Renewal Petition projections.

Object 25, below, shows the VMH Renewal Petition projected revenues by category, with primary funding anticipated from state and federal sources. The Local Control Funding Formula (LCFF) remains the largest revenue source. VMH projects an average of 68% of total revenue from LCFF entitlement, 27% from other state funding, 2% from federal revenue sources, and approximately 4% from local revenue sources.

Object 25: VMH Renewal Petition Projected Revenue by Category



Object 26: VMH Renewal Petition Projected Average Expenses by Category



Object 26, above, presents VMH's projected average expenditure distribution over the next five years. VMH projects that personnel costs will account for an average of 53% of the total expenditures, representing the largest share of the school's operational spending. The remaining 47% include, but are not limited to, expenses for Charter Management Organization (CMO) Support, facilities, materials and supplies, and other services and operations.

Specifically, management fees represent an average of 11% of total expenditure; facilities expenditures average 14%, reflecting VMH's ongoing facilities lease commitments and related costs; other services & operations on average 15%; and 7% for books, supplies, and other materials. These projected expenditures allocations are generally consistent with VMH's historical spending patterns and appear reasonable based on past data.

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

### **Cash Flow**

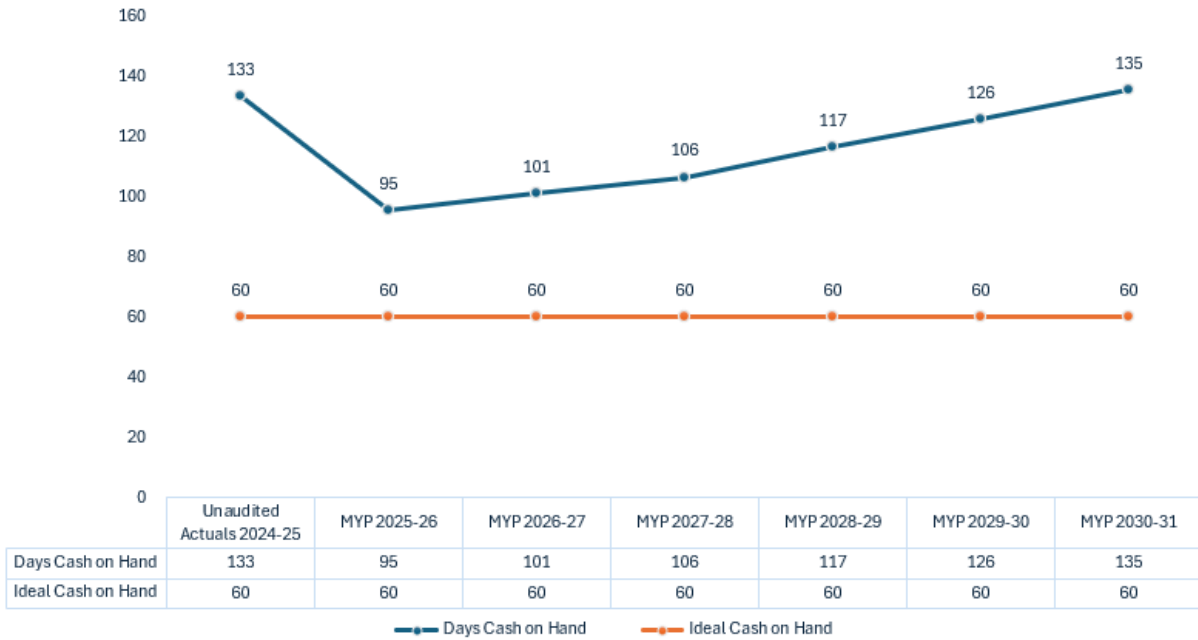
The VMH Charter Renewal Petition includes cash flow projections for FY 2025-26 through FY 2030-31. The multi-year projections include reasonable assumptions regarding the timing of cash inflows from major revenue sources. Based on projections, VMH anticipates maintaining a positive ending cash balance and sufficient cash reserves to meet all its financial obligations during this period. As reflected in Object 27, VMH's Days of Cash on Hand (DCOH) is projected to exceed the best practice and SCCOE expectation benchmark of 60 days, with DCOH ranging from 95 to 135 days by 2030-31.

Historically, VMH's cash position has strengthened significantly. Between 2016-17 and FY 2019-20, DCOH remained below the 60-day benchmark. However, beginning in FY 2020-21, VMH experienced sustained improvement, reporting cash on hand of 72 to 240 days through FY 2023-24.

The Renewal Petition continues this trajectory, with a projected average cash on hand of approximately 116 days across the renewal term.

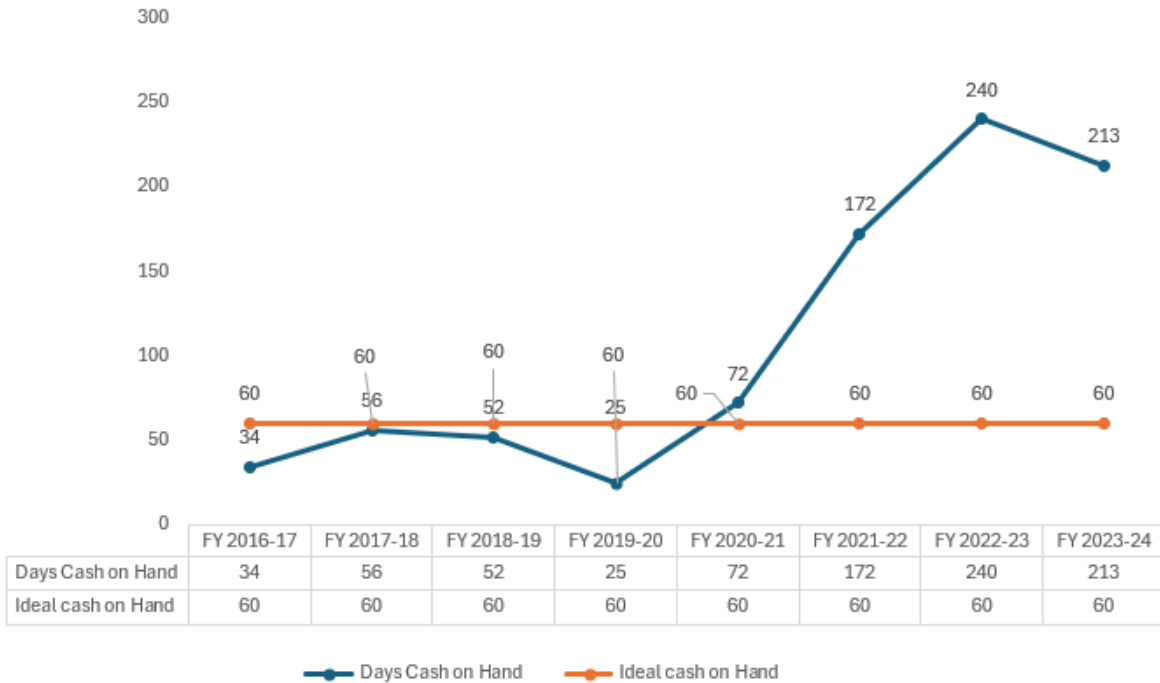
**SPACE LEFT INTENTIONALLY BLANK**

### Object 27: VMH Renewal Petition Days of Cash on Hand (DCOH)<sup>1</sup>



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

### Object 28: VMH Historical Days of Cash on Hand<sup>1</sup>



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

### **Potential Civil Liability Effects on the School and County Office**

VMH is in compliance with its current MOU, including the insurance and indemnification, defense, and hold harmless provisions. The Renewal Petition specifies that VMH will carry insurance as recommended by its insurance company and enter into an MOU to indemnify SCCOE. It is essential that VMH comply with the SCCOE's current requirements regarding insurance and indemnification, defense, and hold harmless (not just its insurance carrier's recommendations) in order to protect SCCOE and VMH from potential civil liability effects of VMH's operations. The 2018 MOU – including its insurance and indemnification obligations – 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 VMH will not continue to abide by SCCOE's requirements and the agreed upon MOU and/or an addendum thereto.

#### **2. Exclusive Public Employer**

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

#### **3. Requirements for Grade-Levels Served, Facility Location, and Students Served**

VMH currently serves TK-8. It is located within the boundaries of the MHUSD in a facility built for VMH's specific needs, and VMH plans to remain at that location throughout the renewal term. VMH is located at 16505 Monterey Road, Morgan Hill, CA 95037.

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

#### **4. Any Other Criteria Set Forth in the Statute**

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

The Renewal Petition specifies that VMH will provide transportation only as required by a student's IEP. It is also necessary that VMH provide transportation as required by the McKinney-Vento Homeless Assistance Act and/or any other requirement of law. This compliance should be specified in the MOU and/or an addendum thereto.

### **CONCLUSION**

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

Staff recommends the VMH Charter be renewed with the condition that VMH and VCBLA enter into an MOU and/or an addendum thereto on or before March 15, 2026, or such later deadline as agreed to by the County Superintendent or designee, that addresses each of Staff's concerns and recommended conditions identified above, including as specifically reviewed in this Staff Analysis. Recommendations, and Proposed Findings of Fact,

### *VMH Charter School*

and as necessary to update and/or replace the terms of the 2018 MOU and 2022 Addendum to be consistent with current law and SCCOE best practices, as well as any additional conditions identified by the SCCBOE.

Staff further recommends that the SCCBOE effectuate these actions by adopting the proposed resolution entitled: Resolution Approving with Conditions for a term of July 1, 2026, through June 30, 2031, the Charter Renewal for VMH Charter School, and, Alternatively, Making Written Factual Findings Supporting Denial & Denying the VMH Charter School Charter Renewal if the Requirements Are Not Met.

#### Student Impact

The Charter School Department provides oversight and monitoring for 20 County Board of Education authorized charter schools. VMH was authorized in 2013 and currently serves approximately 400 students.