

DAAC LCS-EV Report to the Estes Park School District Board of Education

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The District Advisory and Accountability Committee (DAAC) of the Estes Park School District (EPSD) is charged by Colorado State Law and EPSD policy to review any charter school application and report strengths, concerns, and questions to the EPSD Board of Education (BoE). The Loveland Charter School – Estes Valley (LCS-EV) applied to open a charter school in the Estes community. DAAC used most topics in the Colorado Association of Charter School Authorizers (CACSA) Application Rubric as a guide to determining the strengths, concerns, and questions of the application. Given the length of the application and timing, the committee decided to divide the review into parts, with individual members taking responsibility for specific parts. The parts were then assembled into one document for the committee to review and have further input. An overview of some key concepts around strengths, concerns, and questions was developed from that. Be aware that some of the questions have since been addressed.

OVERVIEW OF SOME KEY CONCEPTS:

- **STRENGTHS:**
 - LCS has a 10-year history of being an efficient and well-managed charter school in Loveland.
 - Core Knowledge, Great Works, and Singapore Math are nationally recognized programs.
 - A critical thinking model is included.
 - Curriculum maps are provided for grades and subjects, aligning with Colorado Academic Standards and providing transparency.
 - Policies are basically compliant with state and federal laws and practices.
 - Policies align with legislative intent in having diverse choice options (a classical school) for students and families.
 - The LCS-EV application has a general understanding of special education services and framework in the context of the larger student body at the LCS schools based in Loveland.
 - The policies show a general understanding of discipline procedures of special education students in regards to manifestation determination and change of placement due process.
 - Budgets show standard accounting practices at LCS.
 - Proof of insurance for LCS is provided.
 - The LCS-EV charter application states that LCS has strong relationships with CDE Schools of Choice Unit as well as the Colorado League of Charter Schools (CLCS) for new charter school support.

- There is a desire for LCS to partner with EPSD.
- **CONCERNS:**
 - Re: Purpose -
 - CDE Charter Schools Act purpose: "...to take responsible risks and create *new, innovative, more flexible ways* of educating all children within the public school system...The act seeks the creation of schools with "high, rigorous standards for pupil performance, with *special emphasis on expanded opportunities for low-achieving students.*" EPSD policy states: "Encourage diverse approaches to learning through the use of *different, innovative, research-based or proven teaching methods.*" And adds, "The Board encourages district charter applicants to develop an educational program to serve the needs of students considered "*at-risk*" *academically* as evidence by poor performance on the state assessments, among other things." LCS-EV does not show itself to meet the purpose of the CSA or EPSD policy in that it is not a "new, innovative, or more flexible way of educating all children" nor does it have "special emphasis on expanded opportunities for low-achieving students" or "develop an educational program to serve the academic needs of "at-risk" students. Considering these students make up a significant number of the EPSD population, it would seem that they would be the target population, but, while marginally addressed in the application, they do not seem to be a purpose of LSC-EV.
 - While LCS-EV is expecting to make great gains in growth and achievement with subgroup populations, their experience with ELL learners (2%) is not comparable with the level of ELL students in our community (20%), leaving one to question their ability to understand and serve that population to meet those achievement goals.
 - Re: Impact on district and existing schools and staff to provide services to our youth -
 - Charter schools have an impact on a district – both financial and human. However, there is a big difference in the impact of a charter school of 1000 students on a school district of 15,000 or more students and the impact of a charter school of 100 students on a district of 1000 students. Larger districts have more resources and are better able to dilute the overall impact on staff and students. In EPSD the extra responsibilities on staff – not only in monitoring the charter but also providing services for it - and the loss of finances are feared to adversely affect class sizes, academic offerings, support staff, additional opportunities, etc., in the existing schools.
 - Re: Sustainability -
 - LCS data and its community are consistently used as the basis for the development of the EV campus. There seems to be an

- assumption, without evidence, that the Estes Community is the same as Loveland and what works there will work here.
- Financial sustainability without EPSD support after initial grants and loans to cover the expected expenses for staff, benefits, facilities, supplies, etc., are no longer available is not clear.
 - Potential long-term liability for EPSD is not clear.
 - It is estimated that LCS-EV must maintain at least 6 students/grade for LSC-EV to be financially independent. The estimates of growth do not seem to reflect the understanding that EPSD is not experiencing growth as seen in districts along the Front Range. Estimates do not account for students who may enroll in LSC-EV then return to the regular classroom – some mid-year.
- Re: Curriculum and culturally responsive teaching practices:
 - While Core Knowledge and Great Books offer some valuable knowledge and skills, having so much of the educational learning focused on Western civilization to the exclusion of the perspectives and contributions of other cultures as well as more current literature and events does not give students the experiences they will need understand “our shared humanity” in our diverse society and deal with the challenges they will face.
 - LCS has limited experience with culturally and linguistically diverse students, with much of the special services provided by Thompson School District (TSD). Considering EPSD’s student population, it is important to integrate respect and support into all educational experiences, not just a small percentage of the student’s day/week.
 - Culturally responsive teaching practices are not addressed.
 - There is a lack of media literacy and limited technology instruction and use for K-8 students.
 - Avoiding controversial or sensitive issues and considering different perspectives and information limits the development of executive functioning skills and strategies students will need.
 - Re: Understanding and providing for students with special needs:
 - While the needs of SpEd and special populations are addressed as per state and federal laws, they are minimally addressed in the overall programming, thus not conveying a sense of inclusion by these students and families.
 - It is expected that EPSD will provide for ELL, SpEd, and other special population services. While they would be paid for their services, accounts for the additional responsibilities on top of what they already have does not seem to be taken into account.
 - Projected staffing for SpEd and ELL are minimal and would not meet student needs. Staff needs to be full-time.
 - Recovery rooms do not seem to be in the plans.
 - A waiver for discipline for SPED students was for a discipline procedure that did not clearly define how that would look if the behavior was determined to be a manifestation of the disability.

- The rules for students – including no fidget spinners, no smart watches to track heart rate, no iPods, etc. – do not show an understanding of students with ADHD.
 - Re: Lack of certification requirements for teachers and administrators:
 - Special Education is specifically designed instruction – to be included in the regular ed classroom and discipline. People without proper training in dealing with special populations risk not having the needed strategies and their actions could adversely affect students.
 - While professional development is mentioned, it was not specified to address culturally responsive teaching and the special education populations in the Estes community.
 - There are no clear job descriptions for hiring staff.
 - Re: Extra-curricular programming:
 - While supplemental programming was mentioned for LCS, there is no mention of that for LCS-EV.
 - The expectation seems to be that that would be provided by EPSD.
 - Re: Facilities -
 - LCS-EV is proposing to do unspecified building renovations using funds from a grant they haven't applied for yet.
 - Re: Operating board -
 - While a couple of spots on the governing board are for Estes Valley parents, there is not other representation from the community; the majority of the board is from Loveland – a different community than Estes Valley.
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- **QUESTIONS:**
 - Proposed enrollment numbers need to be thoroughly vetted to determine the financial and human impact on EPSD. What are the numbers for: Actual K-8 enrollees for fall of 2024? Which of those are currently homeschooled? Which of those already attend LCS? Which are current options students? Which are receiving ELL or other special services?
 - What will be the impact of the multiple waivers (health, discipline, lack of addressing controversial issues, lack of teacher certification, etc.) on students?
 - In the list of waivers, JKA (Use of Physical Intervention), JKA-R (Restraint, Physical Holds, and Seclusion Regulation), and JKD/JKE-2 (Disciplining Student with Disabilities) are checked for “Delegate to Charter School”. JK and JK-R are given a rationale that doesn't really clarify how that will be handled, particularly for students with special needs. JKD/JKE-2 has no rationale or explanation. The parts in the rubric about discipline do not mention physical intervention of any type – using it or not – nor is discipline regarding students with disabilities made clear. Why was disciplining students with disabilities waived and how would it be handled – especially when a student has a “melt down” in class?

- What does a plan to facilitate a learning opportunity to implement a positive change in behavior look like – especially for students with ADHD? Students with autism?
- Will a form of restorative practices be used at LCS-EV? If not, why? If so, how?
- How do LGBTQ+ students fit into LCS-EV?
- What criteria are used to dispense character recognition cards and who dispenses them?
- How is critical thinking taught in the elementary grades?
- What type of grading system will be used and how does it support “falter so we may flourish” and intrinsic motivation to persevere without punishing students for mistakes?
- Initially, there are grants and loans to cover the expected expenses for staff, benefits, facilities, supplies, etc. When those funds are no longer available to LCS-EV, what liability does the district retain financially, operationally, legally, etc. with the approval of this application?
- How and for what does the EPSD hold LCS-EV accountable?
- Considering these and other questions in the following More Detailed Review of this document, how will those be answered in either the approval of this charter or in the contract negotiations for this charter?

A MORE DETAILED REVIEW: (copied from the rubric)

STRENGTHS:

- Executive Summary:
 - The application mentions potential strong outcomes, and overarching goals that are worthwhile.
- Vision and Mission Statements:
 - Virtue, character, social responsibility coupled with critical thinking and depth of content are worthwhile outcomes for an educational program.
- Goals, Objectives, and Performance Standards:
 - Goals are tied to the School Performance Framework, CMASS, NWEA MAPs, DIBELS.
- Evidence of Support:
 - LCS-EV does have students and families from Estes Park indicating they will enroll in the fall of 2024. LCS-EV does have community members and businesses owners in Estes Park that do support their school.
- Educational Program:
 - Rationale:
 - Curriculum that is largely based on sound academic principles.
 - Core Knowledge and Singapore Math all have research that shows their effectiveness.
 - It would be helpful to see more elaboration on the areas where the curriculum does not meet state standards in order to declare that portion.
 - Alignment:

- To the extent that the charter chooses to align curriculum with state model content standards, alignment is well articulated across the curriculum.
 - In areas where they do not align with state standards, their curriculum consistently aims for targets that meet both the mission and vision of the school and provides more than adequate horizontal and vertical alignment within their curriculum maps to ensure that the curriculum as a whole meets standards, even if it doesn't precisely align with the year to year details.
 - Instructional Strategies:
 - The application speaks clearly about the broad strokes of the classical education model, and describes the values and intention behind the instructional method with clear conviction.
 - Supplemental Programming:
 - The application speaks clearly about the broad strokes of the classical education model, and describes the values and intention behind the instructional method with clear conviction.
- Plan for Evaluation of Pupil Performance:
 - Long-term achievement goals are outlined for student performance and student achievement.
 - Use of CDE's School Performance Framework, CMAS, PSAT/SAT, NWEA MAP testing, Acadience, classroom formative assessments, and end-of-year cumulative assessments are routine and established.
- Budget and Finance:
 - Standard budgeting practices used.
- Employees:
 - Employee policies are clear and support state and federal laws.
 - Mission, vision, and values are clear and integrated into instruction.
 - Standardized tests are used to evaluate learning.
 - Employee policies for most aspects of employment included.
 - Teacher evaluation form is pretty standard.
- Parent and Community Involvement:
 - The 10-year track record in Loveland, provides some insight into how the LCS has involved parents and community stakeholders.
 - The outreach from parents and the Estes Park community members seeking the attention of LCS, prior to any direct engagement from LCS.
 - Parental involvement is a strong component of LCS and its mission and vision.
- Transportation and Food Services:
 - Transportation: LCS has a carpool app that helps the parents coordinate rides with LCS students near them.
 - Food Services: Three options are listed: families provide lunches, LCS-EV contracts with EPSD for food services, or local or food service providers within Estes Park provide lunch options. Determination will also take into account input and preferences of LCS-EV parents/guardians.

Food services may be a topic of conversation with EPSD with regard to food services.

- Facilities:
 - Description of classrooms and locations included.
 - Timeline for remodeling of church location included.
 - Lease mentioned.
- Waivers:
 - State statutes for which waivers were listed.
 - Rationale for most state waivers listed.
 - Duration is clear: duration of contract.
- Student Discipline, Expulsion, or Suspension:
 - Minor and major infractions and consequences were clear.
 - Policies seem to be in compliance with law.
- Serving Students with Special Needs:
 - The LCS-EV charter application states that it has strong relationships with CDE Schools of Choice Unit as well as the Colorado League of Charter Schools (CLCS) for new charter school support.
 - The LCS-EV application has a general understanding of special education services and framework in the context of the larger student body at the LCS schools based in Loveland.
 - There is general understanding in the charter application of discipline procedures in regards to special education students in regards to manifestation determination, policies regarding change of placement in regards to discipline and due process.
- School Management Contracts:
 - LCS has an effective management system that has been in operation for 10 years in Loveland.

CONCERNS:

- Executive Summary:
 - Overall, the Executive summary is focused on the success of the Loveland schools. It mentions the Estes schools and community only in passing,
 - While the details regarding the LCS plan for students may come later, the entire discussion of the student population that would be impacted is that “many” members of the Estes Park community have requested the establishment of a charter school.
- Vision and Mission Statements:
 - Overall, the mission and vision are cut and pasted from the context and experience of the Loveland Campus, with only a passing mention of the Estes community or context.
 - Application describes clearly the rationale for the formation of the school in Loveland, however - at no point does it articulate any particular vision for its impact on the students in Estes Park. Mentions Loveland community development, but does not discuss the Estes population or community except in passing.

- A focus on a target population is not mentioned other than the parents interested in having LCS-EV.
- Goals, Objectives, and Performance Standards:
 - School Performance Framework:
 - In the first year of operating, LCS-EV will receive a ranking of Improvement on the SPF from the Department of Education. This is no different than current elementary school performance and this rating is often cited as to why this school option is necessary in our community.
 - Intentional projections for subgroup populations are not disaggregated or explicitly mentioned in planning.
 - Provided projections for the LCS-EV SPF are based on LCS currently existing charter and do not reflect the unique nature of the Estes Park School District student populations and the achievement and growth based on current CMAS scores. This data is publicly available for LCS to view and use in data planning and mapping, rather than using current data from another building in an entirely different community.
 - NWEA and DIBELS:
 - Provided projections for the LCS-EV NWEA and DIBELS are based on LCS currently existing charter and do not reflect the unique nature of the Estes Park School District student populations and the achievement and growth based on current NWEA and DIBELS scores. This data is publicly available for LCS to view and use in data planning and mapping, rather than using current data from another building in an entirely different community.
 - While LCS-EV will use NWEA and DIBELS targets based on LCS students, it appears that the charter will also only be looking at percent achievement of a RIT score and percent attainment of the end of year benchmark, and not growth over time. Both growth and achievement should be factored in when determining effectiveness of a charter or school.
 - Subgroup Populations:
 - Provided subgroup projections for the LCS-EV are based on LCS currently existing charter and do not reflect the unique nature of the Estes Park School District student populations and the achievement and growth scores. Given the unique diversity of the Estes Valley, these projections should include explicit mention and data projections and planning for these groups.
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 - While LCS-EV will use targets based on LCS students, it appears that the charter will also only be looking at fall to spring growth rate for their grade level in CMAS, NWEA, and DIBELS, and not achievement scores for these groups. Both growth and achievement should be factored in when determining effectiveness of a charter or school, especially for our marginalized students.

- Application does not define academic goals beyond standardized test scores.
- Evidence of Support:
 - According to the application, the school will only be K-8 to start in the fall of 2024. The numbers in the application are not accurate on page 13 because they list 9th, 10th and 11th graders as potential students. The actual number is 51 not 62 students.
- Educational Program:
 - Rationale:
 - The application speaks broadly about the effectiveness of the classical model from Ancient Greece until its – relatively - recent fall from favor. I wonder what current educational research says about the classical model (The Trivium). The application broadly declares the model to be “time-tested” and what was for millennia simply known as “education”. During the vast majority of this time span, the vast majority of the population of the Western world was illiterate. A quick glance at literacy rates in most of the world where these methods were time-tested, they were tested on a small proportion of the population. The CIA factbook estimates that in the UK (for example) the overall literacy rate grew from around 5% in 1475 to and only reached 80% in the late 1800’s.
<https://ourworldindata.org/grapher/cross-country-literacy-rates>
 Various sources estimate that in the ancient world, the cradle of classical education, literacy rates were consistently far below 50%. The majority of the research shows that literacy rates grew along with growing public education programs in the late 19th and into the 20th century.
 - In regards to the curriculum being culturally responsive, the application requires extrapolation. I believe they could argue that many aspects of the curriculum (Core Knowledge, Spalding, Singapore Math) are culturally responsive in regards to developing schema within school environment (e.g. spiraling), however they may or may not respond appropriately to family structure or background in regards to engaging non-scholastic cultural schema, which also drives learning, in the case of some families.
 - As to the curriculum being free of bias, a review of the “Great Works” upon which they draw their primary sources and literature is centered almost exclusively on white male authors, and the lack of contemporary authors, lack of female authors, and lack of authors from other racial backgrounds is extremely concerning. To posit a curriculum as the distillation of millennia of knowledge while including very few voices of people from historically marginalized groups is at best a misstep, and does not include a well-rounded perspective of either human experience or the experience of our students in contemporary America. The list of works names around 60 authors in the K-8 curriculum, so it is concerning that their

sources for history and literature are drawn from (approximately) 1-2 texts by a woman each year, and from K-8 there are 5 named authors who are not white.

- Alignment: None.
- Instructional Strategies:
 - Where research about the effectiveness of the chosen curriculum could bolster their application, the applicant chooses to discuss the overarching educational model, and depends again on rhetoric rather than research to support their choice.
 - The application focuses more on how they will manage the provision of differentiated instruction with local agencies more than it discusses actual methodology of instruction and differentiation. Differentiation is mentioned once in the application. They discuss targets/intended outcomes, but mention very little about the actual differentiation that will take place to support all learners.
- Supplemental Programming:
 - Clearly the current proposed enrollments will not support all of the proposed programming, but that will resolve itself as a practical matter over time.
- Plan for Evaluation of Pupil Performance:
 - Student sub-groups (ELL, students with disabilities, minority students, McKenny-Vento, and Free and Reduced Lunch) are expected to perform at the same level as all students, but no information is given about the support those students would receive to make that happen.
 - There is no information about READ plans, IEPs, or English Language Development.
- Budget and Finance:
 - The proposal bases its budget on the enrollment of 108 students or 11% of the current EPSD student body and ending with (17x13) 221 students, or over 20% of the Estes students with their projected increases. Considering, after 10 years of operation, 6% of the Loveland student population is currently enrolled in LCS, this seems high.
 - This contract assumes, in the first year, 11% of the Estes Valley student population will attend LCS-EV. Sustainability of LCS-EV requires this, both financially (income is based per student) and educationally. (Classes smaller than 6 students lack substance.)
 - The start-up grant would likely sustain operations for the first 2-3 years. From the size of the expected "fund balance retained" ending each year, this school is structured as an investment. The first year the grant would be used largely for the remodel. The next year there would be substantial growth of the funds retained. The 3rd year probably expects some more expansion as class sizes enlarge eventually following through to over 20% of Estes Valley students over the 5-year contract. Without the student growth, the investment deteriorates.
 - Special education often requires a full-time teacher plus supportive services and a counselor and nurse, even if there is only 1 student. The

- \$90,000 budgeted will not necessarily cover all of these expenses. Even if LCS plans to subcontract this activity to EPSD, the cost will be roughly the same and should still be covered by LCS funds. The proposed ratio division would not necessarily do this.
- What works for a budget in Loveland may not work in Estes Park.
 - Employees:
 - The proposed waivers cover both teacher training (i.e. certification) and the usual teacher contract, making this at-will employment with very little mandated benefits (exemptions for a small company?).
 - Parent and Community Involvement:
 - As a public school supported by the community - also stakeholders in the education of our students, there is no mention of how other members in the community have any input into what the learning experience for students would be.
 - While the plans are to include parents of sub-groups, there is no mention of a plan to recognize how to be inclusive of our Latinx community.
 - Transportation and Food Services:
 - Transportation:
 - Some parents- especially those in certain jobs (e.g. service jobs), may not be able to transport their children to/from school, presenting an inequitable access for some students.
 - Food Services:
 - No mention was made to accommodate the needs of students on FRL.
 - Facilities:
 - While the application tells the number of classrooms and the inclusion of a gathering hall, there is no floor plan, making it impossible to tell if this facility is sufficient.
 - Play equipment on the grounds was not mentioned.
 - Waivers:
 - Not all waivers were given rationale, explained. E.g. Waivers JKD/JKE-2.
 - EPSD policies to be waived not described.
 - Student Discipline, Expulsion, or Suspension:
 - Dress codes do not allow for variations for hair and clothing commonly associated with different races or cultures.
 - Dress codes can pose a financial hardship for some families, and thus form a barrier to their participation.
 - Policies do not seem to make accommodations for or understand the needs of some students – e.g. ADHD students often attend better if they can fidget, stand to do work, track heart-rate at times of activity, etc.
 - Serving Students with Special Needs:
 - Only \$90,000 is allocated during Year One for Special Education services – \$45,000 for Spec. Ed. Teacher and the remaining \$45,000 for FTE School Psychologist, Occupational Therapist, Speech/Language Pathologist, and ELD services – how is this possible to pay for all of this with only \$90,000 in Year One? Is the School Counselor included in this

figure as well? What if a child were physically disabled and required PT services through their IEP?

- If the school administrator is not required to be certified/licensed, how would appropriate professional development for educators (who are also not required to be licensed) be provided, especially in regards to specialized instruction for special education students?
- What are the implications for waiving the health-related policies and delegating these to the charter school rather than being adopted “As Is” if special needs students have health issues to be addressed?
- “At will” means an employer can terminate an employee at any time for any reason, except an illegal one, or for no reason without incurring legal liability. Likewise, an employee is free to leave a job at any time for any or no reason with no adverse legal consequences. “At will” also means that an employer can change the terms of the employment relationships with no notice and no consequences. If the LCS-EV charter school will be hiring employees “at will”, this could have adverse academic and social/emotional effects on all students, but particularly on special education students.
- If teachers are not required to be certified in elementary education and the Special Education teacher may not always be present in the classroom, it is unclear how non-certified teachers will be trained to implement IEP’s, behavior contracts, 504 plans, and MTSS plans correctly and with fidelity.
- It is not clear from the application how often or how much professional development the LCS Director and Dean of Academics (who are based in Loveland) will deliver professional development. The application also does not designate who will be “teacher coaches”. The budget designates \$2000 in Year One for instructional professional development, \$0 for instructional professional development (Title IIa) and \$0 (Title IV funds) for instructional professional development.
- The application states, “The processes in place to provide additional intervention support via small-group or individualized instruction include the daily half-hour Morning Forum block at the beginning of the school day, grades K-8.” During a public meeting when asked how this extra support would be given, the director stated at LCS that there is a “Classroom Coordinator” in every room, in addition to content teachers that come into the room, so that, most of the time, there are two staff members in every classroom. However, when pressed about this for LCS-EV, he conceded that LCS-EV would not have the same capacity, and one staff member would be teaching in the classroom. (The Substitute teacher would be the “floater” for all of the classes.) *How is this accomplished on a daily basis when only one teacher is in the room with only 1 substitute/floater for the whole school?*
- Granting multiple waivers in several areas (curriculum, hiring/evaluating teachers, records retention, licensure, health-related issues) is not beneficial or equitable for students with Special Needs.
- In regards to the lottery, the application states, “For students with IEPs

who are successful in the lottery, the School will request and arrange an immediate IEP Team meeting within three weeks from when the student is chosen in the lottery. The IEP Team shall determine whether the student can receive a free appropriate public education (FAPE) at LCS-EV. If the IEP Team determines that a FAPE cannot be provided, or is otherwise unable to agree, the student's placement shall be determined as provided by special education law." *This statement is concerning, as the responsibility to make a free appropriate public education (FAPE) available to all students with disabilities applies to ALL public schools under the IDEA (Individuals with Disabilities Act.) A charter school is a public school, and bears the same responsibility.*

- The application indicates a preference for using EPSD resources for all ESS, but appears to offer limited funds to do so. Many forms of special needs require full-time on-site availability and there is no indication of what to expect.
- Not knowing the ratio of student to service provider, makes it difficult to determine the need of service providers, but the minimum should reflect the minimum at the current EPSD level.
- There are many retired teachers in Estes Park that may be hired at LCS-EV, but there would be a need to assure that they have had training to update their knowledge – especially those involved in special education.
- Because the existing LCS has a contract with Thompson School District to provide all ESS services, the LCS Board and the LCS school have no visible experience with SpEd, ELL, Speech, Remedial Reading, Physical Therapy, or a myriad of other ESS services. Therefore, it would seem that some EPSD authority would need to oversee ESS in some way to assure that sufficient and appropriate services are provided.
- There is no mention of modifying the curriculum for students needing special services.
- LCS has limited experience with large populations of English Language Learners, as are present in our Estes community, and how best serve them.
- School Management Contracts:
 - No draft of a management contract.
 - No EMP.

QUESTIONS:

- Executive Summary:
 - Where is there evidence that they are trying to work with our particular community, and not simply applying a “cookie-cutter” school in trying to expand from a community that is much larger than our own?
 - Where is the mention of the Estes student population and the focus on our students?
- Vision and Mission Statements:
 - What are the interests of the Estes founding families?

- What was the process/discussion within the development of the replication effort? How would this impact the Estes community in a different way than the Loveland community?
- Goals, Objectives, and Performance Standards:
 - How will LCS-EV ensure both the elementary and middle level CMAS ratings are reflective of a performance rating? What will be the steps taken to ensure both of these levels are performing at the performance level starting in 25/26 and not one level pulling up another for a cumulative performance rating?
 - Why is LCS-EV projecting the same Improvement SPF rating in the 24-25 school year that the Estes Park Elementary School currently has been assigned?
 - How will LCS-EV ensure both growth and achievement scores are included in projections for measuring effectiveness for NWEA, DIBELS, and all student subgroups. Having robust projections that factor in both growth and achievement are vital in ensuring a quality education.
 - How does the use of LCS data in setting expectations and metrics for LCS-EV ensure the unique nature of the Estes Park community and students are factored into the accountability metrics provided? Why was this decision made when setting these expectations and how will this serve the Estes Park community and its needs?
 - How do the metrics provided connect to the LCS-EV mission and vision? How do these assessments align to the Core Knowledge values and beliefs of this charter?
 - What academic growth goals, beyond scores on standardized tests, exist for LCS-EV students as individuals?
- Evidence of Support:
 - What is LCS-EV's projected enrollment number to be able to open in Estes Park?
 - How was this number determined for LCS-EV?
 - What does the state (CDE) say is an adequate percentage of parents, pupils, and community members supporting LCS-EV for it to open?
 - Have the prospective families mentioned in the application, filled out intent to enroll forms with LCS-EV?
 - Can we see those forms without personal information? What is the LCS-EV enrollment/recruiting plan moving forward from the filing of the application?
 - Have enrollments increased since the filing of the application in October?
 - What are the enrollment numbers currently?
 - On the enrollment chart on page 13, did LCS-EV make sure to project out the numbers to the fall of 2024? (I am not assuming anything)
 - How many (the largest number of students) does LCS-EV plan to have enrolled in the fall of 2024?
 - What is the geographical area that LCS-EV will cover? Is it the same as Estes Park School District?
 - What is the exact number of students that will enroll in LCS-EV in the fall

- of 2024 that will pull resources from the Estes Park School District (currently enrolled Estes Park students versus unenrolled and unaffiliated homeschool kids versus students enrolled in Estes Park School District's Options Program)?
 - Exactly how much money will be pulled away from the Estes Park School District?
 - What happens when students leave LCS-EV after the October count date?
 - Does LCS-EV keep the money they receive from the state?
 - What percentage of students enroll and then leave LCS in a typical year?
- Educational Program:
 - Where is the process for differentiating material? How will all students access the material presented? Would students who receive special education, ELD, or 504 services be required to receive those services at EPSD?
 - Could we be provided with the research that shows that the proposed curriculum is effective with our target population?
 - What is the projected number of students who receive special services?
 - How are teachers or staff (since they are asking for a waiver to not have to have certified teachers) trained in the presentation of the curriculum?
 - How will the curriculum be implemented in classrooms that might only have a couple of students? For example, the Socratic method is mentioned in the application; however to implement this method, a class would need more students than what is currently being proposed, and the number of students that are expected to attend is vague.
- Plan for Evaluation of Pupil Performance:
 - What systems are used to maintain and monitor student data and information?
 - How is student performance data used to make changes as appropriate?
 - How are student subgroups (see above) supported in order to successfully meet performance criteria?
- Budget and Finance:
 - What happens to this budget proposal for sustainability if only 6% of the student population enrolls?
 - Any new business or other financial endeavors must have a "bail-out" plan. If there is debt to resolve, who pays it? If there is money left, collected from Estes Valley taxes, who retains it? Where is the point when it becomes time to do that?
 - Assuming the millions of dollars in reserve that LCS will make available to LCS-EV are from Loveland taxpayers, can LCS legally lend it to LCS-EV? Wouldn't Loveland taxpayers need to approve that?
 - If they do not attract enough students from the Estes Valley to sustain the school financially, will they draw from families in Loveland or Denver to fulfill the enrollment?
 - Questions for a lawyer (for the protection of EPSD):

- 1) How much financial liability does EPSD legally retain for the loan that LCS-EV will require to fulfill all they dream of providing?
 - 2) If EPSD denies, and the Colorado School Board overrides (reverses) that, does that mitigate the liability?
 - 3) Setting curriculum and other educational points aside, can (and should) EPSD set requirements (in the contract) to force closure if LCS-EV is not financially sustainable? OR deny on that basis? OR approve and hope for the best, even though NOTHING is contained to prepare for failure?
- Employees:
 - How will equitable grading be used – especially for at-risk students?
 - Because of its educational structure and curriculum content (or lack of), will this school end up being one for high-achieving, compliant students?
 - Parent and Community Involvement:
 - Does LCS rely upon, and serve, one segment/population of the community, with a narrow bandwidth of concern(s) involving specific, personal interests, which only represent that portion of the community?
 - What accommodations are made for people who work in jobs where they can't always get off work to the convenience of the school?
 - Transportation and Food Services:
 - Transportation:
 - How would LCS-EV assure equitable access for all students?
 - If that solution involved EPSD, what would be the impact on EPSD staff and students?
 - Food Service:
 - How would LCS-EV implement “Healthy School Meals for All” as a result of the passage of Proposition FF?
 - Facilities:
 - Does the building provide a gym? An art room? Separate music rooms for a band and choir? A special ed room? A cafeteria arrangement? Theatrical facilities?
 - Waivers:
 - In Appendix F: LCS-EV Policy Waiver Matrix:
 - Why were JKA (Use of physical intervention), JKA-R (Restraint, physical holds, and seclusion regulation), and JKD/JKE-2 (Disciplining student with disabilities) checked “Delegate to Charter School” instead of “Adopt as Is” with no clear explanation of the plan?
 - What will be the policy regarding physical intervention?
 -
 - Serving Students with Special Needs:
 - *The LCS application states that, “A major priority for LCS-EV is the (academic) targets for our identified populations of English Language Learners, Students with Disabilities, Minority Students, McKenny-Vento, and Free and Reduced Lunch Eligible student subgroups.” See percentages below of different sub-categories of students:*
 - EPSD has 1061 students, with 40 students in the Options K-8

program. Of that:

- 28% are Latinx
 - ~9% are Special Ed
 - ~6% are GT
 - 20% are ELD district wide, with ~22% at EPES and ~18% at EPMS
- *Does LCS seek to represent and educate students with disabilities and other sub-groups at similar percentages in the makeup of the LCS-EV charter school campus? If not, why not?*
 - What are the benchmarks for expanding Special needs, if the student population requires more than one Special Education teacher?
 - LCS-EV has requested that the policy for IHBA Special Education Programs for Students with Educational Disabilities AND IHBB Gifted and Talented Education be “Delegated to the Charter School” rather than adopt “As is”. There is no clear rationale stated in the application for these waivers. What is the rationale for requesting these waivers and how will it affect the delivery of Special Education (and G/T programming) at LCS-EV?
 - Will the \$50,000 allocated for “facilities improvement” for the church include ADA compliant areas for physically disabled students, and potentially, faculty (classrooms, bathrooms, stairways, hallways, etc.)? This is not specified in the charter school application.
 - What are the implications for waiving the health-related policies and delegating these to the charter school rather than being adopted “As Is” if special needs students have health issues to be addressed?
 - If the school administrator is not required to be certified/licensed, how would appropriate professional development for educators (who are also not required to be licensed) be provided, especially in regards to specialized instruction for special education students?
 - \$90,000 is allocated during Year One for Special Education services – \$45,000 for Spec. Ed. Teacher and the remaining \$45,000 for FTE School Psychologist, Occupational Therapist, Speech/Language Pathologist, and ELD services for Year One—how is this possible to pay for all of this with only \$90,000? Is the School Counselor included in this figure as well? What if a child were physically disabled and required PT services through their IEP?
 - How different (SPECIFICALLY) will the service delivery model for special education students be at LCS-EV vs. LCS in Loveland?
 - What would be the impact of time and effort for EPSD ESS teachers and staff to toggle between EPSD and LCS-EV – 2 very different educational models - to provide services to LCS-EV?
 - What mechanism will be in place to allow smooth transition of confidential SpEd records between EPSD and LCS-EV?
 - Legally, the EPSD School Board maintains some responsibility for the education of the students at LCS-EV. Therefore, what mechanism would be in place for EPSD to observe and evaluate the educational program at

LCS-EV and what would be the impact of time and effort to do so?

Alex Medler, Executive Director of the Colorado Association of Charter School Authorizers, and Mike Arnold, Senior Program Associate of Manhattan Strategy Group, were available for questions around the process.