

FINAL APPLICATION REVIEW 2014-2015

Proposed School Name (Commonwealth):	New Heights Charter School of Brockton
Grades Served At Full Capacity:	6-13
Number of Students At Full Capacity:	840
Proposed School Location:	Brockton
Proposed Opening Year:	2015-2016

Mission Statement:

Our mission is to provide urban students in grades 6-13 an early college experience coupled with academic rigor, meaningful relationships, relevant experiences and a school-wide culture of success that leads students TO and THROUGH college.¹

Proposed Growth Plan for First Five Years of Operation:

School Year	Grade Levels	Total Student Enrollment
First Year	6-8	315
Second Year	6-9	420
Third Year	6-10	525
Fourth Year	6-11	630
Fifth Year	6-12	735

The Department of Elementary and Secondary Education (Department) has compiled a summary of the evidence identified through the review of the charter application, the responses provided by the applicant group during the subsequent interview, and the testimony and comment provided at the public hearing and during the public comment period. The summary describes the evidence identified that addresses the application criteria and identifies the areas of the application criteria where limited evidence was provided during the application process.

¹ It was unclear to reviewers what portion of the school’s response to the application criteria would play the specific role of the mission for the proposed school. For the purposes of application review, the Department assumed that the ‘our mission’ statement was the proposed mission.

Public Comment:

The application received testimony and written comment in support; materials were primarily from parents, potential students, and alumni of Brockton public schools. During the interview, the applicant group described the volume of support received via completed petitions, and intent to enroll forms. The applicant group submitted a significant number of signed petitions and supporting evidence of interest in a charter school for Brockton.

This application received testimony, and written comment in opposition during the public hearing and public comment process, including but not limited to State Representatives Michelle Dubois and Mike Brady, Mayor Bill Carpenter, members of the Brockton School Committee, Superintendent Kathleen Smith, members of the city council, employees of the city, parents, students, teachers, administrators, and representatives of the local collective bargaining units.

Mission and Key Design Elements (I.A. and I.B.)

Identified Evidence

- The mission defines the purpose of the school and indicates the key design elements proposed to achieve outcomes. The mission is consistent with high academic standards and student success. The focus of the mission is to “provide an early college experience” and to lead students “to and through college.” (I.A.)
- In the application and during the interview, the applicant group demonstrated an understanding of the academic profile of the anticipated student population based on the performance of Brockton students on the Massachusetts Comprehensive Assessment System tests (MCAS). The applicant group indicated that the inclusion of double blocks of English language arts (ELA) and mathematics as well as remediation support structures are targeted to support student learning, and achieve grade level performance by grade 9 in preparation for college-level coursework in grade 10. (I.B.)
- In the application and during the interview, the applicant group described a clear intent to implement a rigorous and accelerated lower school (grades 6-9) in order to ensure access to college-level courses in the upper grades (grades 11-12). Students would be introduced to a college course in each semester during grade 10 to be taught on the proposed charter school’s campus. College coursework in grade 10 would focus on foundational college skills and public speaking curriculum. (I.B.)
- The applicant group proposes a grade 13 in order to ensure that students get “to and through college.” During the interview, the applicant group discussed their interest in supporting students in navigating the challenges of higher education participation and success for an additional year. The applicant group indicated that by raising the high school graduation requirements, the school would be able to fund grade 13 through traditional Chapter 70 funding. The Department has determined that the intersection of a number of statutes and regulations related to K-12 education would likely prohibit a Chapter 70 funding mechanism for grade 13. (I.A. and I.B.)

Limited Evidence

- While some of the key design elements are explicitly stated in the school’s mission, “academic rigor, early college experience, meaningful relationships, and relevant experiences,” not all key design elements are consistently reflected or fully realized in the application’s description of the educational program and its implementation. The application identifies the key design elements as: the resiliency model described as involving relationships, rigor, and relevance; an academic focus on literacy and numeracy; an advisory program; an early college design; grade 13; and professional development. (I.A.)
- The application does not clearly establish how the proposed educational program will effectively achieve aspects of the proposed mission, including the identification of student interests and future career prospects. The application refers to career days, internships, work-based learning plans, and college visits but does not provide a clear plan on the integration of these strategies into a cohesive and comprehensive approach to student success. (I.A. and I.B.)
- The application did not identify a proposed higher education partner for the proposed school. The applicant group indicated the interest of the Massasoit Community College during the interview. Massasoit Community College currently operates an alternative education program called *Gateway to College* with a number of partner school districts, including Brockton, to provide dual enrollment to a similar high needs student population. A letter of commitment has yet to be provided by the potential higher education partner. During the interview and within the application, the applicant group also indicated the intent to seek out a similar partnership with a four year higher education partner. (I.B.)

Description of the Community to Be Served and Enrollment and Recruitment (I.C. and I.D.)

Identified Evidence

- During the 2013-2014 application cycle, members of the applicant group unsuccessfully pursued the proposed Commonwealth charter school in Fall River. As a result of enrollment granted to new and existing charter schools, there were no longer seats available for the creation of the proposed school in Fall River. Based on the proposed size and geographical location of the founders involved, the applicant group reviewed the various other communities on the South Shore and identified Brockton as a potential fit for the proposed educational program. The applicant group indicated that their decision was guided by Brockton's overall record of achievement as measured on the MCAS, the size of the district's high needs student population, and the current enrollment of Brockton residents in educational options outside the district, including nearby charter schools. (I.C.)
- During the interview, the applicant group described a variety of current strategies to increase community awareness of the proposed school, and to recruit students reflective of their targeted high need student population. Members of the applicant group have sought training from other charter schools outside of Massachusetts on successful recruitment strategies to implement in Brockton, such as positioning outreach workers at the three supermarkets in the city to talk with parents and potential students about the proposed school. (I.D.)
- The application describes a variety of recruitment strategies, including the use of enrollment materials translated into Haitian Creole, Portuguese, and Spanish. The applicant group has identified a group member as the proposed parent/family outreach coordinator, Tiara Burke, who is currently facilitating recruitment. Subsequent to application submission, the applicant group has submitted petitions that include signatures from residents interested in bringing a charter school to Brockton. (I.D.)
- The application indicates the commitment to fill vacancies through grade 12, exceeding Department requirements for backfilling. (I.D.)

Limited Evidence

- The applicant group's knowledge and understanding of the students who may enroll at the proposed school is unclear based on the limited information regarding the specific needs of the anticipated student population, and how the proposed educational program will address the needs of the student population to be served in Brockton. (I.C.)
- While the application did not explain the rationale for the proposed size of the school, the applicant group indicated during the interview that the size of student enrollment would provide the financial means to fully implement the staffing required to support the proposed educational program. (I.D.)

Overview of Program Delivery and Curriculum and Instruction (II.A. and II.B.)

Identified Evidence

- The proposed school will implement an extended year of 184 days and an extended day of 8:00 a.m. - 3:30 p.m. for grades 6-10, with a shortened day on Fridays for teacher professional development. The school will provide an hour of support and enrichment programs at the end of every school day (3:30-4:30 p.m.). Additional support will be provided to students on Saturday mornings for two hours, as needed. Summer programming is also proposed for students who do not meet promotion requirements. (II.A.)
- The applicant group clearly articulated during the interview the understanding that new eighth graders during the first year of operation will require significant staffing, and intense remediation to support student growth, and progress towards access to college courses. The applicant group stated that the number of college credits a student would be able to accumulate will depend on whether a student enters the program at the sixth grade entry point or at a higher grade. During the interview, the applicant group indicated that students would be able to acquire 15 to 30 credits minimum if the students enters the program at a later grade or is placed in remedial or developmental courses initially in grades 11 and 12. (II.A. and II.B.)
- During the interview and within the application, the applicant group indicated the intent to select the course made available to students in grades 11 and 12 while providing the tuition for students to select courses for grade 13 enrollment. The courses selected for grade 11 and 12 will be based upon general education requirements typically taken during the first year of college enrollment, and fulfillment of high school graduation requirements. (II.A., II.B., and II.C.)
- The proposed Director of College Access, Dr. Jessica Geier, provided descriptions during the interview of the proposed approach to ensuring quality curriculum and instruction to be provided by the higher education partner(s) through the cohort model during grades 11 and 12. (II.B.)

(cont. next page)

Limited Evidence

- Within the application, the narrative contains an inconsistent level of detail to provide reviewers a clear sense of the implementation of the proposed educational program for students at all grades. During the interview, the proposed employees were able to provide some additional details regarding the implementation of the proposed educational program that was not clearly articulated in the application. It remains unclear how students participating in the early college aspect of the program (grades 11-13) will meet the requirements for 990 hours of structured learning time. (II.A.)
- While the application states the intent to provide weekly advisories, and internship opportunities, these aspects of the academic program are described in a limited manner. The limited descriptions of the implementation of advisories and internships prevented clear understanding of how the school will support student success, and assist students in pursuing a career path after graduation. Advisories are described as time set aside daily in the morning and afternoon for community and skill building, as well as for students to receive individual supports from teachers and service providers. Afternoon advisories are described as whole grade directed study and teacher office hours. It is unclear how advisories will be managed and operated to ensure effectiveness within the educational program. (II.A.)
- Within the application and during the interview, the applicant group described a proposed schedule for students in grades 11 and 12 that provided limited information regarding the systems and structures necessary for successful implementation and oversight. The student schedules would incorporate days on the proposed school's campus and days on the proposed higher education partner's campus. The applicant group indicated the intent for a cohort of content area teachers that would support students in grades 11 and 12 during their alternating days on the charter school's campus (3 days versus 2 days respectively). The application states that when students are on the charter school campus, they will be participating in community service, career exploration, and academic support. Based on the information provided, it remains unclear the experience of students, tutors, college guides, and teachers, and the administrators responsible for oversight. (II.A.)

Overview of Program Delivery and Curriculum and Instruction (II.A. and II.B.) (cont.)

Identified Evidence

- The application described the role of the Director and Assistant Director of Curriculum and Instruction (DCIs) in the weekly review of teacher lesson plans, the biweekly review of student performance at grade level data meetings, and the quarterly review of interim assessment performance. These strategies will be implemented to support effective feedback and coaching to teachers as well as adjustments to instruction. (II.B.)
- During the interview, the applicant group described the strategies to be used by the school with ninth and tenth grade students to identify and address the academic areas that require additional support and development in order to access college level courses and credit. The proposed school will use the Accuplacer diagnostic test for identification purposes, and provide remediation during the summer between grades 9 and 10 as well as institute adjustments to school programming based on student performance. It is unclear what member of the administrative team would oversee this transition point for students and staff or how the assessment data would be used to inform curricular adjustments. (II.B.)
- The application describes a number of opportunities before and during the school year to implement professional development for faculty. All faculty will participate in 15 full days of professional development in addition to the weekly Friday afternoon professional development. Examples of proposed professional development include training in the Universal Design for Learning (UDL) to support differentiation in the classroom. The professional development schedule also includes five data days after the completion of interim assessments in order to review, and develop plans in response to student data. (II.B.)

Limited Evidence

- While the application states that the group has received support from “curricular experts” to develop curriculum maps for all proposed coursework, the application does not describe the specific methods or processes to be used by the school for the ongoing development, improvement, and refinement of the curriculum, and assessments. The application noted the opportunities in the schedule, such as daily common planning time and retreats, and the individuals involved, DCIs, teachers, and external consultants, but did not explain the work it would involve. (II.B.)
- The application did not provide a description of the variety of learning environments proposed within the grades to be served, including the use of tutors and college guides. The application provided a limited description of the instructional methods to be used to deliver the curriculum model, and briefly referenced the use of Response to Intervention tiers, blended learning (online tools such as Khan Academy), and reciprocal teaching. It remains unclear how the proposed school will achieve the goal of personalized instruction for students. (II.B.)
- While the application describes the intent to assist students in the development of individual learning plans, the application does not describe the implementation of learning plans within the educational program or how the proposed school will use that proposed tool or other strategies, such as tutors and college guides, to achieve the goal of individualized attention in an 840 student secondary school. (II.B.)
- The application states the intent to provide a competency based curriculum for programming provided during Saturdays and the summer. It remains unclear the rationale for the differences in programming or how the academic program during the school year will be integrated with programs for students who are struggling academically. (II.B.)

Student Performance, Assessment, and Program Evaluation (II.C.)

Identified Evidence

- The application indicates the use of a variety of commercial assessments, including Sustainability Tracking, Assessment, and Rating system (STAR) and Fountas & Pinnell assessments, to measure, track, and support student learning. (II.C.)
- The application describes the inclusion of specific “data days” within the school year to support targeted review and response to student performance on quarterly interim assessments. Within the application and during the interview, the applicant group reported that student data will be used to identify and implement interventions to meet student needs. Teachers will collaborate with content areas DCIs to identify action plans for implementation. (II.C.)

Limited Evidence

- The application narrative does not clearly describe how the school will implement the opportunities scheduled within and outside of the school day to support students who require additional support. It is unclear how the quality and effectiveness of supports will be monitored and evaluated. While the time is set aside to offer supports, the design of providing supports appears informal and unclear. (II.C.)
- The application narrative references a number of different strategies to assess student performance that are not robustly integrated into the discussion of the school’s assessment system, including the use of a “College Portfolio” by students in grade 10, products and outcomes from quarterly retreats, an individual learning plan, and a work-based learning plan. (II.C.)
- While the application provides a clear discussion of the various actions taken by teachers and the DCIs during the school year, the application does not describe how the school’s board of trustees, students, and parents will participate in the review and response to student achievement data. (II.C.)
- The application did not describe a meaningful and practical approach for measuring and supporting student progress toward attaining non-academic goals in alignment with the proposed mission and students’ needs. It remains unclear how the community service learning projects will be integrated into the educational program, and assessed for progress towards the non-academic goals for students. (II.C.)
- While the application states the clear intent to use student interim assessment and STAR data, the application did not describe the plan on how MCAS performance data will be used to facilitate decision-making about necessary adjustments to the proposed educational program. (II.C.)

Supports for Diverse Learners (II.D.)

Identified Evidence

- The application contains descriptions of the processes and procedures that the proposed school would use to implement programming to serve English language learners (ELLs) and students with disabilities substantially consistent with Department guidelines. The descriptions demonstrate an understanding of the majority of legal requirements. (II.D.)
- During the interview, the applicant group indicated that the proposed DCI assisted in the development of the responses to the criteria specific to the special education programming at the proposed school. (II.D.)
- During the interview, the applicant group indicated that students receiving special education services would continue services on the college campus, including adhering to push-in supports during college courses as required by the student's Individualized Education Plan (IEP). The group articulated the intent to facilitate English as a Second Language (ESL) teachers within the college courses as well to support ELLs. (II.D.)
- The applicant group proposes a Newcomers Academy for students new to the United States and American schools which will include programming specific to students who may have interrupted formal educations prior to their arrival at the school (SIFE/SLIFE). (II.D.)

Limited Evidence

- Based on the application and discussions during the interview, it remains unclear how the school will ensure ELLs participating in college coursework in grades 11-13 will receive instruction from qualified faculty skilled in Sheltered English Instruction (SEI), as needed. The applicant group indicated the intent for ESL teachers to provide push-in supports within the college courses but not the qualifications of the proposed college faculty. (II.D.)
- Subsequent to the submission of the application, the applicant group has selected a potential Director of Student Supports who would design and provide oversight of the programming for both students receiving special education services and ESL programming. The proposed employee did not provide additional information during the interview regarding her role in the implementation of the proposed educational programming or how her role and qualifications would support student success. (II.D.)
- Similarly, the applicant group has selected a potential ESL teacher who participated in the interview but provided no additional information into how the proposed program would serve the needs of ELLs successfully throughout the proposed educational program, including clarifying the settings in which required services will be implemented, and how services will be delivered within the school's daily schedule. (II.D.)
- The applicant group provided limited rationale to explain the staffing plan for serving ELLs and providing English language development instruction. The group relied on the input of an external consultant for the development of the responses to the criteria specific to the ESL programming at the proposed school. (II.D.)

Culture and Family Engagement (II.E.)

Identified Evidence

- The application describes components and strategies for establishing a school culture and norms consistent with the school's mission, educational philosophy, and educational program, including the use of weekly community meetings, quarterly community service projects, retreats, and daily advisories. (II.E.)
- The application describes a wealth of services to be provided by the local YMCA to support students and their families. Students and staff who are not participating in professional development will have access to the YMCA for recreation on Friday afternoons. Mental health counselors from the YMCA will provide services to students on the school's campus as an additional support. The proposed budget also contains funds set aside to assist families with medical costs. The budget does not appear to reflect costs that may be associated with the Friday programming and transportation between the YMCA and the school. (II.E.)
- The governance model of the proposed board of trustees includes board membership earmarked for a parent/guardian of student(s) enrolled at the proposed charter school. (II.E.)

Limited Evidence

- While the application describes specific strategies to support student development, the proposed school's culture is not meaningfully described, nor is a clear and comprehensive plan for establishing a school culture provided. (II.E.)
- The application describes the Head of School as responsible for the implementation of school culture and family engagement. The intersection of the various roles proposed for the administrative team is not clearly described within the application. The Head of School appears to delegate the role of instructional leader to the DCIs, and instead plays a unique role in the implementation and oversight of the non-academic components of the educational program. It is unclear what member of the administrative team, Executive Director or Head of School, will provide the necessary oversight of the whole school performance, both academic and non-academic. (II.E. and III.C.)
- The strategies presented in table format within the application are not integrated into a clear plan for implementation. The aspects of the program referred to as "wrap-around" services to address the physical, social, emotional, and health needs of the anticipated student population are described in a limited manner. (II.E.)
- The application contained a staffing plan that indicated the intent to hire a half-time nurse to support the needs of the 315 students during the first year of operation. It is unclear how this staffing decision supports the needs of the anticipated student population. (II.E. and III.C.)
- While the application indicates a clear philosophy regarding student behavior that aligns with the proposed mission and educational philosophy, the application does not clearly explain the plans or proposed policies regarding student discipline. (II.E.)

Capacity and Governance (III.A. and III.B.)

Identified Evidence

- As a result of the shift in location from Fall River to Brockton, the applicant group changed composition since its original submission in 2013-2014. The applicant group retained one proposed board member, Nicholas Christ, and four proposed employees, including the proposed Executive Director, Head of School, Director of College Access, and Special Education/ELL Student Advocate. Three of the four retained proposed employees are affiliated with the Resiliency Foundation. While not disclosed at the interview, the proposed DCI is identified as an officer of the Board of Directors of the Resiliency Foundation on the organization's website. (III.A.)
- The proposed board members have a range of experience and qualifications, including K-12 education in charter and district schools, higher education, law, finance, community organizing, non-profit and business management, and governance of non-profit organizations and local governmental bodies. Members include the president of BayCoast Bank, a retired middle school principal, a retired judge, a former state representative, the current Chief Executive Officer of the Old Colony YMCA in Brockton, and a child advocate within the Fall River Department of Child and Family Services. (III.A.)
- Members of the proposed board of trustees have tangible ties to the Brockton community, including a local pastor, and parents. The applicant group provides a broad and diverse representation of professionals committed to serving the student population in Brockton. (III.A.)
- Members of the applicant group have previously founded and led alternative education programs for high need, at-risk student populations in Framingham, and Fall River. A member of the applicant group has prior experience in coordinating early college programming between public schools and higher education institutions in Rhode Island. (III.A.)
- During the interview, proposed trustees articulated a variety of non-academic metrics that would also be used to determine progress towards the school's proposed mission, such as attendance, disciplinary issues, promotion and dropout rates, and staff attrition. (III.B.)

Limited Evidence

- Not all members of the proposed board of trustees were able to attend the Department interview, including the board chair, the Chief Executive Officer of the Brockton YMCA, and three K-12 educators. Only fifty percent of the proposed board was in attendance which limited the Department's ability to assess the capacity of the proposed board to open, operate, and oversee the proposed charter school. (III.A.)
- While the application provides an appropriate description of governance practices to be implemented by a proposed charter school board of trustees, including the development of policies, decision-making, and the recruitment and development of board members, the members of the proposed board in attendance at the interview provided limited and generalized responses regarding their roles as officers and trustees. One exception was an individual who was involved in the group's prior submission in 2013-2014, Mr. Christ. (III.B.)
- The application does not adequately describe the processes related to the board's monitoring and evaluation of the proposed executive director, review and approval of the annual budget, and long term strategic planning. (III.B.)

Management (III.C.)

Identified Evidence

- The proposed administration of the school includes a variety of positions: Executive Director, Head of School, content area Director and Assistant Director of Curriculum and Instruction, Director of Student Support, Director of College Access, Dean of Students, and Director of Operations. Individuals have been identified for six out of the eight positions to assist in the applicant group's ability to quickly move past the planning and preparation stage to the implementation and operation stage required to open successfully in the fall 2015, if chartered. During the interview, the hiring plan, as proposed, was described as essential to a strong foundation of consistent and effective instruction during the early years of operation by the proposed leadership team. (III.C.)
- The proposed Director of College Access has substantial experience in early college and dual enrollment programming as a result of her former positions as the Dual Enrollment Coordinator and Director of Early College Access programs for the Rhode Island Board of Governors for Higher Education, and the Director of the Center for Excellence and College Readiness at the Community College of Rhode Island. Dr. Geier provides extensive knowledge regarding the partnership required between the proposed school and higher education partner(s). (III.C.)
- The proposed DCIs have been identified, and were able to describe during the interview their understanding of the DCI's role and responsibilities at the proposed school. The DCI coaches, observes, and evaluates faculty, while also providing professional development in collaboration with the Head of School. Both individuals demonstrated potential capacity in their proposed roles through knowledgeable and detailed responses to questions during the interview regarding the DCI role. Mr. Neal Klayman is a qualified special educator who has held roles as a Director of Special Education Services and is currently the vice principal of a middle high school on the South Shore. Ms. Meredith Morrison is a former Teach for America member and high school English teacher who is currently pursuing a graduate degree. (III.C.)

Limited Evidence

- The individuals identified for employment at the proposed school have a variety of qualifications and skills that support the potential for success in their proposed role. However, none of the individuals have been involved in the implementation of a secondary school program with the early college components proposed in the application. (III.C.)
- The application did not present a plan for how key organizational decisions about curriculum and instruction, student achievement, professional development, school culture, staffing, fiscal planning, and operations will be made by the key proposed employees of the school. (III.C.)
- The application described a number of different leadership teams performing similar processes of review and observation of the school's day to day operation with slight variations in focus, such as academics, social-emotional, diverse learners, and culture and climate. During the interview, proposed employees provided a limited sense of how the various teams would collaborate and communicate to support effective decision-making, and the development and implementation of action plans in response to school performance. (III.C.)
- While during the interview the applicant group provided additional context to explain the staffing arrangement for grades 6-8, and grades 11 and 12, it remains unclear the extent of instructional duties and school-related responsibilities faculty will have in the proposed educational program. (III.C.)
- The proposed staffing model with its inclusion of an ELL/Special Education Student Advocate, tutors, and college guides clearly supports the interest in developing meaningful relationships with students. However, the application provides limited information regarding how these roles will be integrated into the operations of the school day and proposed educational program, and how the roles will be effectively deployed to support student success. (III.C.)

Facilities, Student Transportation and Finances (III.D. and III.E.)

Identified Evidence

- The applicant group stated that they have identified five different facility options in Brockton for the proposed school. The applicant group has consulted with professionals in Brockton real estate, and believes that the number of unoccupied spaces in Brockton will provide leverage to negotiate facility costs close to the facilities rates of \$893 per pupil, including utilities and maintenance. (III.D.)
- The Brockton Public Schools would provide transportation to students of the proposed charter school based on the proposed daily school schedule in adherence with district policies. The application does not address how transportation will operate with the proposed external partners, including the YMCA and higher education institutions, during the school day. (III.D.)
- The budget and cash flow projection submitted by the applicant group appear to accurately reflect expenditures related to a faithful implementation of the proposed educational program. (III.E.)

Limited Evidence

- The application does not contain explanations as to the facility needs for implementation of the proposed educational program, and how the sites identified at the time of application submission would meet the space requirements as described elsewhere in the application, including space for morning and afternoon advisories, student support from tutors and college guides, and teacher use for common planning periods. (III.E.)
- The applicant group relied on the business manager of a Commonwealth charter school in Fall River (Atlantis Charter School) for assistance in the development of the proposed budget and cash flow projection. The business manager participated in the applicant group's interview and clearly articulated the degree of support provide to the group in determining expenditures related to staffing, including salaries, health insurance, taxes, and fringe benefits. (III.E.)
- The applicant group submitted a balanced budget with no deficit or surplus due to the \$425,000 anticipated from fundraising and grants. The proposed Executive Director, also president of a non-profit support organization called the Resiliency Foundation, indicated substantial success fundraising for prior ventures and confidence in his ability to reach their fundraising goals. The application did not contain any specific letters of commitment or support from potential donors. Contingency planning for the absence of some or all of the funds was not clearly articulated. (III.E.)
- The applicant group does not provide a clear sense of the transportation requirements and cost of implementation of the proposed early college program with the not-yet-identified higher education partner. It is unclear what considerations the group has made to support student access to college campuses. (III.E.)