

**FINAL APPLICATION REVIEW 2015-2016**

<b>Proposed School Name (Commonwealth):</b>	New Heights Charter School of Brockton
<b>Grades Served At Full Capacity:</b>	6-12
<b>Number of Students At Full Capacity:</b>	735
<b>Proposed School Location:</b>	Brockton
<b>Proposed Charter Region:</b> <b>BOLD:</b> Identified as lowest 10 percent district in 2015 rankings	Brockton, <b>Randolph, Taunton</b>
<b>Proposed Opening Year:</b>	2016-2017

**Mission Statement:**

Our mission is to prepare our students for college. Period.

**Proposed Growth Plan for First Five Years of Operation:**

<b>School Year</b>	<b>Grade Levels</b>	<b>Total Student Enrollment</b>
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 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 below 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.

**Public Comment:**

The application received testimony and written comment **in support** during the public hearing and public comment process. At the public hearing, 20 speakers spoke in favor of the school, including parents, community members, and 5 members of the applicant group. Written comment in support includes 584 letters submitted by proposed school leader Omari Walker. The letters, dated 2014, 2015, or undated, are mostly form letters from self-identified residents of Brockton, Randolph, and Taunton. Sixty-one (59 from Brockton, 1 from Randolph, and 1 from Taunton) indicated their children completed an intent to enroll form. The Department received three additional letters in support of the school from community members.

The application received testimony and written comment **in opposition** during the public hearing and public comment process. At the public hearing, 27 speakers spoke in opposition to the school, including: State Senator Michael Brady, State Representative Claire Cronin, State Representative Michelle DuBois, Brockton Mayor Bill Carpenter (Chief of Staff Bob Buckley spoke on his behalf), Brockton City Councilors Bob Sullivan and Shaynah Barnes, Brockton Public Schools Superintendent Kathleen Smith, Taunton Public Schools Superintendent Julie Hackett, school committee members from Taunton Public Schools, Brockton Public Schools, and Southeastern Regional School District, union representatives from the Massachusetts Teachers' Association, Randolph Public Schools, and Taunton Public Schools, teachers, and parents. Written comment in opposition includes 29 letters from school administrators, teachers, parents, and community members.

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

### Identified Evidence

- The succinctness of the mission as proposed by the applicant group establishes a singular goal for students of the proposed school. During the interview, the applicant group elaborated upon how the group defines achievement of its mission. At a minimum, the applicant group reported that all graduates of the program will enter college without the need to enroll in developmental non-credit-bearing coursework. (I.A.)
- The proposed key design elements were consistently reflected throughout the charter application. The proposed key design elements are (1) EDWorks Fast Track Early College Design; (2) “We go to college” culture; and (3) professional and community development. (I.B.)
- Massasoit Community College (MCC) is the proposed school’s higher education partner and has provided a letter of commitment from MCC President Dr. Charles Wall. The application contained a draft Memorandum of Understanding between MCC and the proposed charter school. MCC participated meaningfully in the interview, and has proposed representation on the board of trustees. MCC indicated that the proposed partnership is different than its current *Gateway to College* program and dual enrollment programs. (I.B.)
- The applicant group demonstrated a passionate understanding of and connection to the proposed mission during the interview, as well as a strong commitment to serve the proposed charter region with an emphasis on the Brockton community. (I.A. and I.B.)

### Limited Evidence

- The key design elements do not all align with the mission statement due to its brevity. The potential richness of the proposed program is not accurately captured by the language in the proposed mission and key design elements. (I.A. and I.B.)
- In general, the goals presented within the application did not reflect an effective understanding of SMART goals. Non-academic goals in particular were limited and generalized in nature. (I.B.)

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

### Identified Evidence

- During the interview, the applicant group reported additional evidence to support full enrollment at launch, including approximately 600 intent to enroll forms for the opening grades of 6, 7, and 8. (I.C.)
- The application provides a specific rationale for the overall size of the school as well as the proposed opening enrollment of 315 students in grades 6-8. The application describes the proposed maximum enrollment as a viable and sustainable size to best implement aspects of the educational program in support of the proposed school's mission. The school will reach its full enrollment of 735 students in 2020-2021. (I.D.)
- The proposed school will allow the entry of new students through grade 11, which exceeds the regulatory backfilling requirement. (I.D.)
- In the application and during the interview, the applicant group outlined their on-going efforts to recruit students from their targeted communities, including boots-on-the-ground canvassing in communities, and marketing through community agencies and organizations. (I.C.)

### Limited Evidence

- The applicant group added Taunton and Randolph to the proposed school's charter region which resulted in a composite lowest 10 percent district. In doing so, the proposed charter school is not reliant on the charter award of two other applicants serving lowest 10 percent districts. In the application as well as during the interview, the applicant group has projected that 90 percent of student enrollment is anticipated from Brockton, the proposed location of the charter school. The applicant group has had limited success in generating more than several intent to enroll forms from residents of Taunton and Randolph. (I.C. and I.D.)

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

### **Identified Evidence**

- The proposed school support organization, EDWorks, has supported the establishment of a number of early college charter and district schools with strong track records of performance. The proposed school design will use EDWorks' FastTrack as its foundation. The Commissioner reviewed the performance of three early college high schools and one early college middle-high school in Ohio affiliated with EDWorks during his determination of proven provider status. All four schools demonstrated strong track records of academic performance for economically disadvantaged students. (II.A.)
- Representatives of EDWorks will provide specific supports to the proposed school during its six month planning period as well as throughout its first charter term. The application included a draft agreement with EDWorks that delineated the following areas of support (1) school design and organizational development; (2) leadership development; (3) best practices in teaching and learning; (4) curriculum alignment and development; (5) assessments and data analysis to improve student outcomes; and (6) school climate and support to students. The draft agreement included tailored supports requested by the proposed school related to input on effectiveness of implementation and progress towards its goals. The application also includes descriptions of the general categories of professional development which representatives of EDWorks will facilitate on a monthly basis. (II.A. and II.B.)
- The proposed school will implement an extended year of 184 days and an extended day (7:40 a.m. – 3:30 p.m.), with a shortened day on Fridays for teacher professional development. The proposed school will also implement a summer program called Summer Bridge, focused on both academic and non-academic development in partnership with MCC. (II.A.)

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### **Limited Evidence**

- The complex nature of the proposed educational program will require meaningful and effective participation of all partners, and strong oversight by the proposed board of trustees for promised outcomes. (III.C.)
- The plans for the implementation of the proposed middle school grades are underdeveloped in comparison to the extensive discussion of the implementation of the early college components, with an emphasis on the logistics of scheduling the envisioned cohorts within the College Ready and College Prep pathways. (II.A. and II.B.)

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

### Identified Evidence

- The application provides examples of how the key design elements are reflected in the implementation of the proposed educational program and how programmatic design, such as the double periods of mathematics and English language, and the proposed College Ready and College Prep pathways target the diverse needs of individual students. (II.A.)
- While reviewers expressed concerns about the flexibility of pathway assignments and the access of students in College Prep pathways to credit-bearing college courses, the applicant group was able to clarify and address concerns about the implementation of the pathways during the interview. The applicant group reported that the distinguishing difference between College Prep and College Ready pathways would be the supports provided by special education and/or English as a Second Language (ESL) teachers participating in the College Prep classrooms and not the use of different curriculum. The applicant group noted differentiation in supports within the pathways to explain the proposed staffing model and the level of supports provided for students with disabilities and English Language Learners within the general education classrooms. (II.A.)
- Reviewers indicated concerns about the potential limited access to the college experience afforded by the description of proposed programming found in the charter application. During the interview, the applicant group and representatives from MCC provided additional details regarding the vision for access of students once they are enrolled in credit-bearing courses on MCC campus. (II.B.)
- The application states that the group has received support from ‘curricular experts’ to develop curriculum maps for all proposed coursework, and that EDWorks will support the faculty in the development of curricula during the annual summer retreat. The application noted numerous opportunities in the proposed schedule, such as the two daily prep periods and Friday professional development, to support professional learning communities. (II.B.)

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

### Identified Evidence

- The application described a variety of assessments that are consistent with the proposed school's mission and educational program, including internally developed quarterly interim assessments. The application contains a plan for monthly activities related to the assessment system, including the frequency and types of assessments, the actions taken by administrators and faculty, and, the opportunities for reviewing and responding to student data. (II.C.)
- The application indicated that access to credit-bearing college level courses is determined by either the completion of the developmental courses in English language arts and mathematics or passing a diagnostic placement exam selected by MCC, such as Accuplacer. (II.C.)

### Limited Evidence

- It remains unclear how the proposed school will effectively support, monitor, and measure student progress towards non-academic goals. The application indicated the intent to develop rubrics for non-cognitive skills. During the interview, the applicant group described the role of advisories in the intentional development and monitoring of the non-academic skills of students. (II.D.)
- The application describes a promotion policy that appears to limit promotion if a student fails one course, and an exit policy that appears to permit dis-enrollment for academic and behavioral reasons. At the interview, the group was unable to adequately address the Department's concerns beyond stating that both policies were still evolving, would be reviewed and revised by school leadership, and ultimately discussed with the board for recommendations and approval. (II.C.)
- While the application states the clear intent to use student interim assessment and diagnostic data, the application did not describe the plan on how state assessment 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 ELLs and students with disabilities substantially consistent with Department guidelines. The descriptions provided demonstrate an understanding of the majority of legal requirements. (II.D.)
- The application indicated that students receiving special education services would continue receiving services on the college campus, including push-in supports during college courses as required by the student's Individualized Education Plan (IEP). The application also articulated the intent to provide English as a Second Language (ESL) teachers within the college courses in a similar fashion to support English language learners (ELLs). During the interview, MCC indicated the plan to ensure college faculty had SEI training as needed. Special education teachers and ESL teachers will support a specific cohort of students during their three days a week on the MCC campus as well as the two days a week on the proposed school's campus. (II.D.)

### Limited Evidence

- No primary concerns noted.



## Culture and Family Engagement (II.E.)

### Identified Evidence

- The application describes five components the proposed school will use to establish the “we go to college” culture with the acronym KTECH, and describes specific strategies in support of these values. KTECH is (1) knowing our students better; (2) trusting our students more; (3) empowering our students in authentic ways; (4) connecting to our students in meaningful ways; and (5) honoring all students in varied systems of recognition and reward. Strategies include daily advisories, quarterly retreats, and a discipline approach informed by conflict resolution strategies (Full Circle Discipline Model). (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.)
- The application describes services to be provided by the local YMCA to support students and their families, including the deployment of mental health counselors as an additional support for students and families. (II.E.)

### Limited Evidence

- While the application notes that the head of school will oversee the development of school culture until a dean of students is hired in year two, the application does not describe a clear plan for establishing a school culture prior to the first day of school and during initial implementation. (II.E.)
- The application indicated within the staffing plan 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. The Department has concerns regarding language within the application which appears to indicate an inconsistent approach to promotion, enrollment, and expulsion. The Department may require or recommend revisions to the draft student handbook submitted during the opening procedures process for all new charter schools. (II.E.)

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

### Identified Evidence

- The composition of the proposed board has changed since the applicant group's prior submission in 2014-2015. The applicant group retained seven proposed board members and seven proposed employees, including the proposed executive director, head of school, director of college access. Three other administrators experienced shifts in their roles. The group has added four members to the proposed board, two of whom were added after the final application was submitted. The majority of the applicant group was in attendance at the interview in January. (III.A.)
- The proposed board members have a range of experience and qualifications, including K-12 education in district schools, higher education, law, finance, community organizing, and governance of non-profit organizations and governmental bodies. Members include a mortgage broker, retired judge, former state representative, the current chief executive officer of the Old Colony YMCA in Brockton, and a special educator. (III.A.)
- Members of the proposed board of trustees have tangible ties to the Brockton community, including a local pastor, student, and parent. The applicant group provides a broad and diverse representation of professionals committed to serving the high need student populations in Brockton, Randolph, and Taunton. The group is seeking additional members as representatives of Taunton and Randolph. (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. One member of the applicant group has prior experience in coordinating early college programming between public secondary schools and higher education institutions in Rhode Island. (III.A.)

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### Limited Evidence

- While the application provides an appropriate description of governance practices to be implemented by the proposed charter school board of trustees in developing policies, making decisions, 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. The proposed board of trustees appears to be in the early stages of development as a proposed governing body, and did not demonstrate a comprehensive understanding of the role of a charter school trustee during the interview but the majority of individuals indicated a clear accountability mindset that will support growth in their proposed trustee role. (III.B.)

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

#### Identified Evidence

- The application and the interview provide evidence that the applicant group is reflective about its proposed program, has responded to previous Department feedback proactively, and implements strategies to support continuous improvement in its planning and preparation for implementation of the proposed school. (III.A.)
- The application sufficiently addresses the majority of governance criteria, and indicates the intent, if chartered, to contract with a third party, *Board on Track*, to provide training to the proposed board regarding best practices of highly effective charter school boards of trustees. (III.B.)

## Management (III.C.)

### Identified Evidence

- Individuals have been identified for four out of the five proposed administrative positions in year one of operation which will support 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 2016, if chartered. The hiring plan was described in the application 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 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 knowledge regarding the partnership required between the proposed school and higher education partner. During the interview, it was clear that Dr. Geier and MCC appear to have already established an effective working relationship with detailed plans and discussions regarding effective implementation by both the school and the college. (III.C.)
- The proposed dean of curriculum and instruction and the director of student services have both been identified, and demonstrated an understanding of their responsibilities at the proposed school during the interview. Ms. Meredith Morrison is a former Teach for America member and high school English teacher, and is currently a lead teacher in Lawrence performing curriculum development. Mr. Neal Klayman is a qualified special educator who has held roles as a Director of Special Education Services and administrator and teacher at Resiliency Preparatory School in Fall River. (III.C.)
- The application contains detailed descriptions of the roles and responsibilities for the school leader and other administrative staff. (III.C.)

### Limited Evidence

- The proposed administrators have a variety of qualifications and skills that support the potential for success in their proposed role. However, none of the individuals has been involved in the implementation of a secondary school program with the early college components proposed in the application. The proposed head of school and dean of curriculum and instruction have limited to no experience in similar administrative positions. (III.C.)

## Management (III.C.) cont.

### **Identified Evidence**

- In the application, the applicant group described activities to ensure continuous improvement of the school model, including regular opportunities for faculty and leadership to collaborate as a whole school, grade level, and content area. (III.D.)
- The application contains a proposed agreement between the proposed school and the non-profit Resiliency Foundation (current employer of three proposed school employees) to continue to provide the salaries for the proposed employees during the planning period as an in-kind contribution. The Department has previously encountered such arrangements during the establishment of a public charter school with a non-profit partner. (III.A. and III.C.)
- In addition, the application contains two draft agreements: the proposed memorandum of understanding with MCC, which establishes clear parameters for the proposed relationship with the charter school, and the expectations for the responsibilities of each entity; and the proposed services agreement with EDWorks, which establishes the annual development and implementation of specific services to meet the needs of the proposed school. (III.A. and III.C.)

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

### Identified Evidence

- During the interview, the applicant group reported it had identified a viable option for locating in Brockton that requires renovation. The proposed school has negotiated and secured a renovation loan of \$400K to prepare the facility for the 2016-2017 school year. (III.D.)
- The application describes a number of fiscal controls to be implemented by the board of trustees, including reports from the board treasurer at each board meeting and reviews of financial statements on a monthly basis by the finance committee and on a quarterly basis by the board. (III.E.)
- The application contained a clear description of the proposed school's finances via the submitted budgets and cash flow projections, with generally reasonable assessments of projected revenue and expenditures with limited exceptions. (III.E.)

### Limited Evidence

- The proposed budget and associated narrative do not provide a clear understanding of the scope of anticipated debt that would be incurred by the school during the pre-operational period through the building renovation loan, the private non-interest bearing loan, and the bank line of credit, nor the repayment of debt. While the budget indicates the repayment of \$529K during the first year of operation, it is unclear if this amount reflects all projected debt during the pre-operational period without additional information. (III.E.)
- The budget includes a fee provided to EDWorks for its services during the first charter term, approximately \$90K during the first year of operation which decreases to \$70K in the fifth year of its charter term. The annual fees reflected in the five year budget do not clearly align with the proposed fees described in the draft agreement with EDWorks for the planning period or the charter term. (III.E.)