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| **Final application REVIEW 2018-2019** |
| **Proposed School Name (Commonwealth):** | Massachusetts Wildflower Montessori Public Charter School: Haverhill |
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| **Grades Served At Full Capacity:** | 1-8 |
| **Number of Students At Full Capacity:** | 240 |
| **Proposed School Location:** | Haverhill |
| **Proposed Opening Year:** | 2019-2020 |
| **Mission Statement:**Wildflower Montessori Public Charter School: Haverhill will offer Montessori micro-schools—tiny educational environments that are integrated within the community and led by teachers operating as social entrepreneurs—in which children have the tools and freedom to do the great work of constructing themselves. Our students will develop a strong academic foundation and skills in the areas of critical thinking, collaboration, creativity, and communication and grow into curious, capable contributors to their communities and the world.**Proposed Growth Plan for First Five Years of Operation:**

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| **School Year** | **Grade Levels** | **Total Student Enrollment** |
| First Year | 1 | 30 |
| Second Year | 1, 2 | 60 |
| Third Year | 1, 2, 3 | 90 |
| Fourth Year | 1, 2, 3, 4 | 120 |
| Fifth Year | 1, 2, 3, 4, 5 | 150 |

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 summary below 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, 16 individuals spoke in support of the proposed school, including parents, community members, Massachusetts Charter Public School Association Executive Director Tim Nicolette, and one member of the applicant group. The Department received written comment in support from 26 individuals, including parents and community members.**Public Comment (cont.):**The application received testimony and written comment **in opposition** during the public hearing and public comment process. At the public hearing, approximately 15 individuals spoke in opposition to the proposed school including: Haverhill Mayor James J. Fiorentini, Haverhill School Committee member Scott Wood Jr., Haverhill Education Association President Ted Kempinski and Vice President Anthony Parolisi, Massachusetts Teachers Association President Merrie Najimy and Vice President Max Page, teachers, and parents. Three district representatives read a statement from Haverhill Superintendent Margaret Marotta who was unable to attend the hearing. Written comment in opposition includes a written statement by the mayor and superintendent, approximately 324 postcards from Haverhill Public School teachers in opposition to the proposed school, as well as 22 emails in opposition to the proposed school and 83 emails in opposition to proposals in Haverhill and other cities in Massachusetts where charter requests or applications were under consideration.In addition, the application contained seven letters of support from organizations that propose to collaborate or support the proposed charter school. The following organizations submitted letters: Coalition for a Better Acre, Lee Properties, LLC, National Center for Montessori in the Public Interest, the Professional Center for Child Development, POSE: Power of Self-Education, Phoenix Charter Academy Network, and Fishbrook Design Studio. |

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

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| **Identified Evidence** | **Limited Evidence**  |
| * The proposed school’s mission describes the purpose and the value of the school for families in Haverhill. The school’s focus is to provide a learning environment where children ‘construct themselves’ in clear alignment with the proposed Montessori educational program. (I.A.)
* The mission is aligned with the proposed key design elements of: (1) Montessori method; (2) special focus on scientific pedagogy; (3) Montessori in an enriched environment; (4) schools interconnected with the community beyond the classroom; (5) small learning communities led by teachers. (I.A. and I.B.)
* The mission clearly states student outcomes consistent with high academic standards and student success. The proposed school will ensure students ‘develop a strong academic foundation’ and names four skill areas for student development: critical thinking, collaboration, creativity, and communication. (I.A.)
* The application clearly describes the applicant group’s core beliefs and values about education, which align with the proposed mission and key design elements. The mission communicates the belief in connecting the school with the surrounding community through micro-schools located within the neighborhoods where students live. The key design elements demonstrate the commitment to an authentic Montessori program that supports child development. (I.A. and I.B.)
* The application provides several goals for the school that are consistent with the mission and aligned to the five key design elements. The proposed goals state key pieces of evidence regarding how the proposed school will monitor the implementation of its design. (I.B.)
 | * The application’s key academic and non-academic goals are primarily process-oriented and related to implementation of the school design and not directly associated with individual student outcomes. The draft accountability plan, provided as an attachment, includes additional measures related to student outcomes as measured through the proposed assessment system, including use of the state’s accountability system. (I.B.)
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| **Description of the Community to Be Served and Enrollment and Recruitment (I.C. and I.D.)**

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| **Identified Evidence** | **Limited Evidence**  |
| * In the application and during the interview, the applicant group indicated a commitment to serve Haverhill students and families using a Montessori educational program. The applicant group proposes to locate the classroom sites within the Mt. Washington and Acre neighborhoods to ensure economically disadvantaged families and children of color have access to the proposed school. The applicant group view the school as an effective vehicle to address the opportunity gaps experienced by students of color. (I.C. and I.D.)
* There is limited access and increasing demand for public Montessori programs for elementary grades in Haverhill. There is currently one public charter school that delivers a Montessori program in Haverhill, which serves 306 students in grade K-8. The annual waitlist for the Hill View Montessori Charter Public School has more than doubled in the past three years from 128 to 294 children. (I.B.)
* The Wildflower Foundation is affiliated with two Montessori preschools in Haverhill: Marigold and Zinnia Montessori preschools. Several members of the applicant group are familiar with the programs in Haverhill and Cambridge, as parents who enroll their children in the schools, volunteers at one of the schools, or the primary lead founder of a third Wildflower preschool in Haverhill, the proposed Wisteria Montessori preschool. In addition, parents of children enrolled in the Haverhill preschools provided public comment in support of the proposed school and expressed the intent to apply for admission of their child. During the interview, the applicant group indicated that word of mouth has played a key role in the establishment of support for the proposed school. (I.C. and I.D.)
 | * In the application and during the interview, the applicant group provided limited evidence of preparation for March 2019 pre-enrollment. The applicant group’s assessment of demand is reliant upon current demand for the Hill View Montessori Charter Public School and current enrollment at Wildflower preschools. (I.D.)
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| **Overview of Program Delivery and Curriculum and Instruction (II.A. and II.B.)**

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| **Identified Evidence** | **Limited Evidence**  |
| * The application provides several examples of research on student outcomes relevant to the proposed school design, including academic and non-academic outcomes for students identified as economically disadvantaged. The application cites research associated with traditional Montessori programs implemented nationally. (II.A.)
* The proposed school’s schedule exceeds structured learning time through an extended school day of 8:00 a.m. to 4:00 p.m. Monday through Thursday and a shortened school on Fridays of 8:00 a.m. to 2:30 p.m. The proposed schedule incorporates an hour for recess and mealtime. There are also weekly class meetings for students to engage in leadership roles in the school community. The proposed school year is 180 days. (II.A.)
* The proposed staffing model includes two teacher leaders for each multiage class of 30 students. The co-led classroom will support individualized support for students over a three-year cohort model for lower elementary classrooms (grades 1-3) and upper elementary classrooms (grades 4-5). (II.A. and II.B.)
* In the application and during the interview, the applicant group clearly described the learning environment as a traditional Montessori classroom. The use of morning and afternoon work cycles provides blocks of time where student learning aligned with Montessori methods can take place as well as interventions or specialized instruction as needed. (II.A. and II.B.)
* Students in the lower and upper elementary levels will participate in physical education programming for a minimum of 150 minutes each week. (II.A.)
* The National Center for Montessori in the Public Sector (NCMPS) will work directly with the proposed school to support the development of curriculum aligned to the Montessori approach and Massachusetts Curriculum Frameworks. The application provided a scope and sequence for grade levels available during the proposed school’s first charter term. (II.B.)
* There are 16 full days scheduled for professional learning time for teacher leaders: nine days before the start of the school year, two professional development days and two data days during the school year, and two days at the conclusion of the school year. Due to the self-management approach, teacher leaders will determine the use of scheduled time for professional development. (II.B.)
* Due to the shortened school day on Fridays, teacher leaders have two hours for planning and meeting with colleagues as well as additional administrative duties. (II.A. and II.B.)
* The application describes a teacher leader evaluation process in alignment with the overall self-management structure of the school design. The proposed evaluation process for school employees involves a self-evaluation twice per year with input from colleagues and other members of the school community. The leadership committee reviews all self-evaluations and may initiate a conflict resolution process if there is disagreement regarding the individual’s performance or future employment at the school. The board of trustees has the final authority to review the decisions of the leadership committee or initiate a conflict resolution process as needed. (II.B.)
 | * The applicant group proposes to implement the Wildflower Montessori model that incorporates storefront individual classrooms located in the neighborhoods where students live. The Wildflower Montessori model is in the initial stages of implementation in public charter schools. One school is in its first year of operation in Minnesota and another school was recently approved to open in New York in 2019-2020. The model has yet to establish a track record of success with the proposed grade span of 1-8. (II.A.)
* Due to the novel nature of the proposed school design, the application did not provide evidence of research supporting the effectiveness of the proposed educational program for targeted student subgroups, such as students with disabilities and English learners. (II.A. and II.B.)
* The application does not clearly identify the extent to which the school will use developed curriculum or rely upon teacher leaders to develop new curriculum. The application reports that the process to facilitate the development, improvement, and refinement of curriculum will be designed by the teacher leaders once hired, will be supported by a proposed curriculum director added to the staff in year 3, and aligned to the key design element of scientific pedagogy. The application does not describe clear expectations regarding how this work will be accomplished prior to the proposed launch in August 2019 or the types of supports or resources that teacher leaders will access within the Wildflower network of schools. (II.B. and III.C.)
* Due to the leadership role of teachers within the proposed school design, teacher leaders will develop and implement a number of components necessary for school launch. For example, the initial plan to train and support teachers to meet the needs of students will be developed and based on the diverse skillsets and qualifications of the first cohort of teacher leaders. (II.B.)
* The application indicates that the leadership committee will develop the teacher leader evaluation process in accordance with the self-management approach, subject to approval of the board of trustees. The application does not describe the key elements of the proposed performance evaluation approach. (II.B.)
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| **Student Performance, Assessment, and Program Evaluation (II.C.)**

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| **Identified Evidence** | **Limited Evidence**  |
| * The application described how the Montessori approach would eliminate the practice of social promotion, permitting children to make academic progress based on their mastery of content and skills rather than their age. (II.C.)
* The proposed assessment system maintains fidelity with the proposed Montessori program in the use of various tools to support teacher leader observation of student learning, such as student portfolios and Sensei, which involves electronic monitoring of student activity. Wildflower Foundation indicated that both teacher leaders and parents are able to opt out of the Sensei system designed to monitor student activity and use of classroom materials. Any implementation of the Sensei system would require review and approval during the Department’s opening procedures process. (II.C.)
* The application identifies a variety of assessment tools to measure students’ performance, NWEA MAP in ELA, math, and science; DIBELS; and Minnesota Executive Function Scale (MEFS). These assessments were selected to monitor academic performance and executive function of individual students as well as performance over time by site, grade levels, and school. These assessments will be administered multiple times over the course of a school year to monitor progress and identify areas where support is required. (II.C.)
* The applicant group has identified Transparent Classroom, an online student management system for Montessori schools, as the tool for collecting, aggregating, and sharing student performance data with stakeholders. (II.C.)
* The proposed school would undergo an annual Wildflower School Certification process that includes visits from veteran Wildflower teacher leaders to support effective implementation of the Wildflower model. (II.C.)
 | * The sample holistic standards provided within the application do not clearly establish the school’s policies or standards for promoting students as it relates to the mission of the school. The exit standards for eighth grade do not establish a clear sense of expected student achievement aligned with the mission of the school. (II.C.)
* The assessment system does not clearly explain how the school will determine progress of students in developing skills in critical thinking, collaboration, creativity, and communication. (II.C.)
* The application provides limited information regarding the plan to measure and support social-emotional learning of students. The application indicates that the leadership committee will identify an assessment for measuring social-emotional learning prior to the start of the school year. (II.C.)
* The application needs further development and explanation of the processes that will be used to analyze and use student data to facilitate decision-making about necessary adjustments to the educational program and the staff development plan. The application indicates the use of two data days prior to parent/teacher conferences for teacher leader analysis. (II.C.)
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| **Supports for Diverse Learners (II.D.)**

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| **Identified Evidence** | **Limited Evidence**  |
| * The application demonstrated clear knowledge of the legal requirements for implementation of the English language development (ELD) program. The application adequately addressed the majority of elements, including the initial identification procedures and parent notification procedures. For example, the application states that students potentially in need of ESL services will be identified and assessed by the English language education director using the Home Language Survey and the WIDA Screener. The application also describes a plan to facilitate Sheltered English Immersion endorsement for teacher leaders, including reimbursement for course costs. (II.D.)
* The application demonstrated knowledge of federal requirements for implementation of the special education program. The application provided a general overview of required components of the program, including the identification of students for services and the development of an individualized education program (IEP). (II.D.)
* The application described a continuum of services and referenced the Massachusetts Tiered Systems of Support as the ‘blueprint’ for the proposed school’s delivery of special education services. (II.D.)
* The applicant group has identified the Professional Center for Child Development as a potential partner for providing specialized services to students. (II.D.)
* The application describes the plan to implement an inclusion classroom with push-in supports for students as needed. In the instances where pull-out services are warranted, the proposed facility planning will incorporate additional space for use by specialists and service providers. (II.D.)
 | * The proposed staffing model does not include fulltime English as a second language (ESL) or special education teachers and is reliant upon contracted services and/or dually licensed special education or ESL teacher leaders for the delivery of services within the co-led classroom. Based on the part-time employment of the English language education director and special education director, it is unclear if the proposed staffing plan will be sufficient if the population of high needs students exceeds projections. (II.D.)
* The application contained a description of the special education program that did not provide sufficient details regarding effective implementation within the proposed school design. While not in attendance at the interview with Department staff, the proposed board of trustees includes a licensed special educator. (II.D.)
* During the interview, a potential ELD service provider to the school appeared to indicate that if the needs of students receiving special education services could not be met in the general education classroom, the proposed school would initiate conversations with Haverhill Public Schools regarding alternative placement. This statement did not align with the charter application. It is unclear if the individual was referring to a full-time day or residential special education program. (II.D.)
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| **Culture and Family Engagement (II.E.)**

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| **Identified Evidence** | **Limited Evidence**  |
| * The application describes the inherent attributes of a Montessori learning environment and its influence on the creation of a positive school climate and culture where students can exert their independence and feel connected to their peers and community. The application describes the use of a prepared Montessori classroom environment to support the development of self-regulation and cooperation. (II.E.)
* The application describes how the proposed school will provide an intimate school environment through its individual sites serving no more than 30 students in a multiage classroom over a 3-year period. The applicant group states that these micro-schools will support the development of strong relationships amongst students, teachers, and family members that will enable the school to engage families in their child’s educational development. (II.E.)
* The applicant group has integrated throughout the application the commitment to implement culturally sustaining pedagogy in support of students’ identities, including hiring priorities for teacher leaders and professional development for staff. (II.E.)
* The applicant group has identified Conscious Discipline and restorative justice as foundational elements to the school’s approach to student discipline in alignment with the school’s key design elements. Conscious Discipline integrates social-emotional learning with classroom management to support development in both teachers and students of seven core skills: composure, encouragement, assertiveness, choices, positive intent, empathy, and consequences. The applicant group has also identified restorative justice practices as a complementary approach built upon relationships rather than negative reinforcement or punishment. (II.E.)
* The application names a few strategies to support the development of relationships with families, including home visits by teacher leaders, and two parent/teacher conferences annually to discuss student progress and development. (II.E.)
 | * While the application provides the conceptual framework for the school’s culture, the application does not clearly describe a plan with specific strategies to establish school culture and climate. (II.E.)
* The application describes the philosophical approach to discipline but provides limited description of the plan for implementation, including proposed policies. (II.E.)
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| **Capacity and Governance (III.A. and III.B.)**

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| **Identified Evidence** | **Limited Evidence**  |
| * The applicant group consists of six proposed board members and one proposed teacher leader. All but two proposed trustees are Haverhill residents. The proposed trustees have diverse professional experience in public education, including charter schools; innovative school development; community engagement and advocacy; non-profit management; finance; development; law; and governance. Two of the six proposed trustees are leaders at Teach for America in Massachusetts, including the proposed board chair, Meredith Boak. The proposed board also includes one of the founders of the Hill View Montessori Charter Public School, who served on the founding board of trustees for several years. (III.A.)
* A prospective teacher leader has been self-identified and is currently receiving professional development support from the Wildflower Foundation to prepare for the launch of one of the initial two sites of 15 students in first grade. Lea Lewkowski is Montessori certified with 10 years of elementary school teaching experience, including four years at Hill View Montessori Charter Public School. (III.A.)
* The proposed board of trustees will select and hire the employees for the first year of operation. In subsequent years, the school employees will develop and implement processes to hire all other school roles. As part of its services to the school, the Wildflower Foundation is responsible for developing a pipeline of potential candidates for employment. (III.A. and III.C.)
* The Wildflower Foundation was established in 2016 to foster the growth and establishment of schools following the Wildflower model. The model is rooted in a Montessori approach with an emphasis on teacher leadership and connection to the community. The Wildflower Foundation will provide financial and in-kind support to the proposed school related to school design; staff recruitment; administration and operations; data management; staff and board member development and training; facilities; campus startup and opening procedures; fundraising (III.A. and III.C.)
* During the interview, representatives of the Wildflower Foundation described supports to be provided to school employees and trustees during the pre-operational period to ensure faithful implementation in accordance with the Wildflower model. (III.A.)
 | * The applicant group has received comprehensive support from the Wildflower Foundation during the application process, including a consultant to initiate and manage the process for the applicant group for two years and an educational consulting group, SchoolWorks, to support application development this year. The applicant group also received support from the National Center for Special Education in Charter Schools, a non-profit organization in Washington D.C., to construct the policies and procedures for special education programming. The external support provided to the applicant group limits the Department’s ability to assess the applicant group’s capacity independent of the Wildflower Foundation. (III.A.)
* The application describes the role of the charter school board of trustees within the proposed governance model as a participant in decision-making by school employees. The generalized nature of the discussion within the application and during the interview did not establish the concrete methods that the proposed board of trustees will use to avoid involvement in the day-to-day management of the school by the teacher leaders of the eight sites. (III.B.)
* The application does not sufficiently demonstrate the planning and preparation necessary for an immediate opening in August 2019. During the interview, members of the applicant group provided limited evidence of readiness to open within five months. (III.B.)
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| **Management (III.C.)**

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| **Identified Evidence** | **Limited Evidence**  |
| * The Wildflower school design employs organizational self-management rather than the use of a traditional hierarchical school community lead by a school leader or principal. Self-management provides levels of independence and autonomy to the teacher leaders to make decisions based on the best interests of their students while relying upon input from peers and stakeholders to inform decision-making processes. The application describes the use of an advice process for decision-making and a conflict resolution process if significant disagreements about decisions take place. The effectiveness of the model relies upon clear knowledge of individual roles and responsibilities and individuals omitted to its success. (III.C.)
* Prospective teacher leaders are self-identified and supported through a Wildflower designed process to assess their alignment with expectations and Wildflower principals. The fully codified process, called the Wildflower School Startup Journey, supports the individual’s planning and preparation to launch a Wildflower site. (III.C.)
* The Wildflower Foundation has undertaken specific efforts to increase the number of Montessori teachers from historically underrepresented or disadvantaged backgrounds. The Wildflower Montessori Diversity Initiative Fellowship Program is designed to support the development of future teacher leaders, particularly bilingual teachers and teachers of color, who are currently underrepresented in Montessori classrooms. (III.C.)
* The school will have a leadership committee consisting of teacher leaders to support the self-management model. The leadership committee will identify the tasks or responsibilities that need to be performed, with the support of the Wildflower network of schools. Roles will be created to assume ownership of identified tasks and be assigned to one of the teacher leaders. The leadership committee meets monthly on Friday afternoons. (III.C.)
* During the first charter term, the proposed school’s staffing plan includes a part-time finance and administration director, responsible for financial management, and a part-time communications and enrollment manager, responsible for student enrollment. The specialized roles of proposed administrative staff provide additional capacity to meet the demands of operating a public charter school. (III.C.)
* The role of regional charter school site coordinator, provided by Wildflower Foundation to support the school, is described in the Wildflower Foundation Education Service Provider Agreement attached to the application. The coordinator will play a substantial role in the effective launch of the proposed school and coordinating Wildflower Foundation services for the school. The coordinator will support the development and implementation of a project plan for the school’s launch. (III.C.)
* Each site will have a site council consisting of the two teacher leaders, a parent, and a teacher leader from another site. The site council will facilitate site-specific decision-making in alignment with the self-management approach of the Wildflower model. (III.C.)
* The proposed organizational chart includes a variety of structures that serve to preserve autonomy of site-based decision-making while ensuring the sharing of resources and best practices amongst individual sites. The organization includes collaborative structures between two or more individual sites called pods, which serve to create professional learning communities amongst teacher leaders. (III.C.)
* The proposed implementation of micro-schools co-led by two teacher leaders requires teachers to perform duties outside of traditional roles within the self-management model. Wildflower Foundation will play a role in the development of a master list of necessary duties for use by teacher leaders in the assignment of roles and duties over time. During the interview, Wildflower Foundation indicated that current work in Minnesota and New York would be used to inform the development of such guiding documents in Massachusetts. (III.C.)
 | * The proposed model of self-management for school employees and trustees is an innovative and novel approach to school oversight not typically found in public schools. Due to the novel nature of this model of management rooted in teacher leadership and autonomy, there is limited evidence available regarding its effectiveness. (III.C.)
* The application provides a generalized explanation of how the school’s administrative roles and processes will be identified and developed by the leadership committee, ‘energized’ by individual employees, and supported by Wildflower Foundation personnel. It is unclear how the school community will effectively support and hold accountable school employees. During the interview, a representative of the Wildflower Foundation reiterated the expectation that employees of the school will choose to leave if they are unsuccessful or the position is not a fit based on the experience of the Wildflower Foundation at other locations. (III.C.)
* Based upon the qualifications needed to support implementation of the micro-schools, the proposed school seeks to employ bilingual teacher leaders with Montessori certification and special education licensure. The proposed average salary for teacher leaders of $60,000 may underestimate the compensation needed to attract and retain staff with the desired qualifications. (III.C.)
* The applicant group proposes to open with two sites in 2019-2020 requiring an additional three teacher-leaders to self-identify and begin their School Start-Up Journey. During the interview, no additional prospective teacher leaders were identified. (III.C.)
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| **Facilities, Student Transportation and Finances (III.D. and III.E.)**

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| **Identified Evidence** | **Limited Evidence**  |
| * The applicant group has developed relationships in Haverhill to support the identification of several potential sites for the proposed micro-schools. The proposed teacher leader and a representative of Wildflower Foundation have toured several sites in Haverhill. The applicant group has also entered into discussions with two developers as potential partners, Coalition for a Better Acre and Lee Properties, LLC. (III.D.)
* The proposed school plans to use the transportation services of Haverhill Public Schools for students. (III.D.)
* The application includes a cash flow projection for the first year of operation and a multi-year budget from the school's start-up phase through its fifth year of operation. The application states that the budget was developed by an educational consultant employed by the Wildflower Foundation, with assistance from SchoolWorks. The application summarizes financial forecasts from the school’s start-up phase through its fifth year of operation, and defines and gives reasonable support for most assumptions behind projections. (III.E.)
* The application states that the part-time finance and administration director will manage financial operations and work in partnership with the leadership committee and the board of trustees to establish policies and guidelines as well as keep stakeholders informed of the school’s financial position. (III.E.)
* The Wildflower Foundation has committed to provide grants of up to $150,000 per site for upwards of $900,000 awarded to the proposed school to support the launch of each of the eight sites required for implementation of the proposed school design. (III.E.)
 | * The applicant group has identified several potential sites for the proposed micro-schools. Based upon the proposed immediate opening in August 2019, there is generalized information regarding how the sites within the Mt. Washington and Acre neighborhoods will support implementation of the classroom’s integration within the community and use of community resources. (III.D.)
* Within the application, the applicant group reports planning for Massachusetts Certified Public Procurement Officer (MCPPO) training as required by law. It is unclear whether the financial assumptions for construction and renovation of the individual sites has taken in account public construction laws as may be applicable. The next [Charter School Procurement](https://www.mass.gov/service-details/charter-school-procurement) training by the Inspector General’s Office is May 2-3, 2019. (III.D.)
* The proposed school’s growth plan and launch of several micro-schools may create challenges to the early financial sustainability of the proposed school over the first charter term. The five-year budget reflects financial and in-kind contributions from Wildflower Foundation to support the multi-site design. The budget provides limited flexibility to accommodate unanticipated financial challenges, such as unanticipated shortfalls or increased costs during implementation. (III.E.)
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