

**Sarasota County Public Schools  
2017 – 2018 Charter School Application Process  
Charter Review Committee (CRC) Analysis and Initial Findings – April 10, 2018**

**Pinecrest Academy Gulf Coast Charter Application**

This document provides the Charter Review Committee’s (CRC) initial findings based on their review and analysis of the application submitted to the district on February 1, 2018. The CRC feedback is divided into three categories: 1) Strengths, 2) Deficiencies/Concerns/Weaknesses, and 3) Areas in Need of Additional Information and/or Clarification. The CRC is offering the applicant an opportunity to respond to the “Areas in Need of Additional Information/Clarification.”

A summary of the CRC’s initial ratings by program area is provided below.

**Charter Review Committee Preliminary Ratings Summary for Pinecrest Academy Gulf Coast**

| I. Educational Plan<br>Standards 1 – 9               | II. Organizational Plan<br>Standards 10 – 15         | III. Business Plan<br>Standards 16 – 22              | Addenda<br>Addendum A: Replication<br>Addendum B: ESP | Preliminary Total                                    |
|--|--|--|---|--|
| 44% Meets<br>56% Partially Meets<br>0% Does Not Meet | 67% Meets<br>33% Partially Meets<br>0% Does Not Meet | 43% Meets<br>57% Partially Meets<br>0% Does Not Meet | 0% Meets<br>100% Partially Meets<br>0% Does Not Meet  | 46% Meets<br>54% Partially Meets<br>0% Does Not Meet |

Note: Due to rounding, percentages may not add to 100%.

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Dear Charter Applicant:

This document provides the Charter Review Committee’s (CRC) initial findings based on their review and analysis of the application submitted to the district on February 1, 2018. The CRC feedback is divided into three categories: 1) Strengths, 2) Deficiencies/Concerns/Weaknesses, and 3) Areas in Need of Additional Information and/or Clarification. The CRC is offering each applicant an opportunity to respond to the “Areas in Need of Additional Information/Clarification.” This clarification process may not be used to submit new information (not requested) or make substantive changes to the submitted application.

Please use this document to submit your responses to the items under “Areas in Need of Additional Information and/or Clarification” and adhere to the following guidelines:

- Use the column labeled “Charter Applicant’s Response” to address the questions and requests for clarification listed.
- Please respond briefly and succinctly to the specific information requested in each section of the application.
- Do not submit information that is not requested.

Do **not** respond to the remarks under “Deficiencies/Concerns/Weaknesses.” Based on the CRC’s evaluation, the weaknesses, deficiencies or missing information identified in the application are considered sufficiently significant that corrections and revisions would constitute a material or substantial amendment to the original application. Therefore, please do not enter information in this box.

**The completed document must be submitted electronically to the Office of School Choice and Charter Schools no later than 12:00 noon on Wednesday, April 18, 2018.** Also provide 6 hard copies of the document. Please follow the directions provided on the cover letter regarding format, number of copies, etc. when you submit your revisions. If you have questions, call (941) 927-9000, ext. 32262.

**Florida Charter School Application Evaluation Instrument**

The following definitions guided the CRC’s ratings:

|                                     |  |
|-------------------------------------|--|
| <b>Meets the Standard</b>           | The response reflects a thorough understanding of key issues and demonstrates capacity to open and operate a quality charter school. It addresses the topic with specific and accurate information that shows thorough preparation and presents a clear, realistic picture of how the school expects to operate. |
| <b>Partially Meets the Standard</b> | The response addresses most of the criteria, but the responses lack meaningful detail and require important additional information.  |
| <b>Does Not Meet the Standard</b>   | The response lacks meaningful detail; demonstrates lack of preparation; or otherwise raises substantial concerns about the applicant’s understanding of the issue in concept and/or ability to meet the requirement in practice.   |

**I. Educational Plan**

The education plan should define what students will achieve, how they will achieve it, and how the school will evaluate performance. It should provide a clear picture of what a student who attends the school will experience in terms of educational climate, structure, assessment and outcomes.

**1. Mission, Guiding Principles and Purpose**

The Mission, Guiding Principles and Purpose section should indicate what the school intends to do, for whom and to what degree.

**Statutory References:**

s. 1002.33(2)

**Evaluation Criteria:**

A response that meets the standard will present:

- A clear and compelling mission and vision statement that defines the guiding principles and values of the school.
- Adequate references to evidence that the application fulfills the statutory guiding principles and purposes for charter schools. (Note: the substance of each addressed principle and purpose will be evaluated within appropriate application sections.)

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

**Strengths (reference page numbers)**

Information Only: The Pinecrest Academy Gulf Coast charter school proposes to serve students in K-8, with up to 800 students by its fifth year of operation. The Pinecrest Academy, Inc. governing board currently oversees 11 schools in Florida and has 7 other approved Pinecrest Academies scheduled to open in 2018 or 2019. This application is submitted as a “Replication of an Existing School Model” application. The application proposes to replicate 2 “A” rated schools operating in Miami-Dade County. (P. 123) Pinecrest Schools are managed by the Academica Management, LLC, an Education Service Provider (ESP) with extensive years of experience managing over 60 charter schools in Florida.

Pinecrest will focus on “standard-based, research-based instruction incorporating STEM themes.” The school’s mission is to provide a safe and nurturing learning environment in which all students are able to master state and national standards.” The school’s mission is to “empower each child to succeed in life and contribute to society in a positive manner.” (P. 1)

The application template requires the applicant indicate the page number(s) of the material within the application that describes how the proposed school will utilize the guiding principles found in section 1002.33(2)(a), F.S. Based on the committee’s review, the written information presented in the Pinecrest Academy Gulf Coast application provides adequate support that the proposed school will be guided by the principals and purposes for charter schools. There is **acceptable evidence** to support that the proposed school has the capacity to:

- *Meet high standards of student achievement while providing parents flexibility to choose among diverse educational opportunities within the state’s public school system.*
- *Promote enhanced academic success and financial efficiency by aligning responsibility and accountability.*
- *Provide parents with sufficient information on whether their child is reading at grade level and whether the child gains at least a year’s worth of learning for every year spent in the charter school.*
- *Improve student learning and academic achievement.*
- *Increase learning opportunities for all students, with a special emphasis on low-performing students and reading.*
- *Encourage the use of innovative learning methods.*
- *Require the measurement of learning outcomes.*
- *Expand the capacity of the public school system.*
- *Create new professional opportunities for teachers, including ownership of the learning program at the school site.*

The application provides **weak evidence** that, in accordance with the law, the proposed charter school would fulfill the following purposes. (Please note that the applicant has the option of responding to these items.)

- *Encourage the use of innovative learning methods.*
- *Create innovative measurement tools.*
- *Provide rigorous competition within the public school district to stimulate continual improvement in all public schools.*

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

None.

**Concerns/Weaknesses**

Comment Only: The Pinecrest Academy school’s educational programs, instruction, and learning methods may not be considered “innovative” because they incorporate many of the programs currently offered in Sarasota’s traditional schools.

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b> | <b>Charter Applicant’s Response</b> |
|--|-------------------------------------|
| None.  |                                     |

**2. Target Population and Student Body**

The Target Population and Student Body section should describe the anticipated target population of the school and explain how the school will be organized by grade structure, class size and total student enrollment over the term of the school’s charter.

**Statutory Reference(s):**

s. 1002.33(10)

**Evaluation Criteria:**

A response that meets the standard will present:

- A clear description of the students the charter school intends to serve including any target populations in accordance with Florida law.
- Alignment of the targeted student body with the overall mission of the school.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

**Strengths (reference page numbers)**

The school’s target population is K-8 students in the Palmer Ranch area. The plan is to open in 2019-20 with K-6 and add grade 7 and grade 8 in each subsequent year, with a projected K-8 enrollment of 738 by Year 3 and up to 800 students in Year 5. (P. 4-5)

If the school is located in this area, the numbers of students and projected growth over time are reasonable. The applicant references capacity at Ashton Elementary and Sarasota Middle School and growth in that geographical area as the rationale for the enrollment projections. (P. 5) See concerns below.

Comment Only: The application submitted maps of the Palmer Ranch geographical area as support of the demand and need for a school. (P. 5) Documents submitted in attachment T: Capacity vs. Additional Students by Attendance Boundary chart and Sarasota County Elementary & Middle School Conditions – 2026 Maps, Building Hope Location Based Demographic Reports.

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**  
None.

**Concerns/Weaknesses**

It is not clear if the applicant intends to limit the enrollment process to a specific group of students as allowable by s. 1002.33(10)(e), F.S., specifically, the provision whereby the school may target students living within a “reasonable distance” from the school. Information submitted includes data for demographics for a 5-mile and a 15-mile radius of the proposed location for the school. This detail is important for the CRC to evaluate the reasonableness of the enrollment projections.

Rather than a narrative description, the application provides statutory language quoted verbatim and irrelevant statute about controlled open enrollment. (P. 4)

Several traditional and charter schools within the 5-mile radius of the target site (identified in the Building Hope geographic map), have stable or below projected enrollment. Across all 15 Sarasota charter and traditional schools within the 5-mile radius the available program capacity is approximately 370 seats. Other than Sarasota Middle School the other middle schools within the 5-mile radius (including Brookside and McIntosh) are expected to have over 800 open seats. The neighboring charter schools, including Imagine School at Palmer Ranch (K-8) are below projected enrollment. Granted, the district’s site-planning analysis indicates a need for an elementary school by 2026. However, capacity at Ashton Elementary and Sarasota Middle School and the projected population growth in the area may not support the projected 424 K-8 enrollment in Year 1.

The anticipated student population in this area will NOT be similar to the Miami-Dade Pinecrest Academy schools to be replicated in Sarasota. Further detail regarding this matter is discussed in the section pertaining to replications of existing school models. (Section Addenda A-Replications)

The explanation as to why the target population aligns with the mission and vision of the school is weak. The rationale given is that the proposed school will replicate a high performing school that offers a well-rounded, standards-based curriculum. (P. 4)

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>   | <b>Charter Applicant’s Response</b> |
|--|-------------------------------------|
| Please state clearly if the school will limit the enrollment process to a specific student population as defined in s. 1002.33(10)(e), F.S., and, if so, which one. If it is “reasonable distance,” please state the distance. (See Section 14)                  |                                     |
| Why is there reference in the application to the 1002,33(10)(e) provision of limiting enrollment for students articulating between charter schools? Is this an error or not applicable because it was copied from another application? Please confirm. (Pp. 3-4) |                                     |

**3. Educational Program Design**

The Educational Program Design section should describe the educational foundation of the school and the teaching and learning strategies that will be employed.

**Statutory Reference(s):**

s. 1002.33(7)(a)2.

**Evaluation Criteria:**

A response that meets the standard will present an educational program design that:

- An educational program design that:
  - Is clear and coherent;
  - Is based on effective, experience or research-based educational practices and teaching methods, and high standards for student learning;
  - Aligns with the school’s mission and responds to the needs of the school’s target population, and
  - Is likely lead to improved student performance for the school’s target population.
- A proposed daily school schedule and annual calendar that complies with statutory requirements for annual number of instructional minutes/days and aligns with priorities and practices described in the educational program design.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

|  |
|--|
| <p><b>Strengths (reference page numbers)</b></p> <p>The “push and pull” philosophy of meeting students’ individualized needs sounds like an effective method and well established best practice of Pinecrest Academy. (P. 6)</p> <p>The school will follow Sarasota’s Reading Plan.</p> <p>STEM-related programs and activities will engage and challenge students – Robotics courses and clubs, Future City and Project Lead the Way. (P. 33)</p> |
|--|

|  |
|--|
| <p><b>Deficiencies/Concerns/Weaknesses: (reference page numbers)</b></p> <p><b>Deficiencies</b></p> <p>None.</p> |
|--|

**Concerns/Weaknesses**

The description on page 6 of the proposed school’s educational program is generic and “all-purpose.” (P. 6)

The applicant states “Academic Excellence” in support for the Pinecrest Academy Inc., schools’ educational programs and best practices. “Pinecrest Schools meet high standards of student achievement” through the delivery of their curriculum and programs. (P. 6) It should be noted that although the two Miami schools to be replicated are “A” rated schools, other Pinecrest schools in Florida are not, and some have a prior history of receiving school grades of C, D and F. (History Worksheet in attachment; FLDOE School Grades)

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>   | <b>Charter Applicant’s Response</b> |
|--|-------------------------------------|
| Briefly describe your afterschool FREE tutoring program. (P. 11)   |                                     |
| How will you determine if a Reading and/or Math coach will be employed? What is his/her role? (P. 11)  |                                     |
| Explain how the Intensive Acceleration Course works? Is this in lieu of Science and Social Studies? (P. 12)  |                                     |
| Provide a sample of what a “personalized academic and career plan” includes? Do all students have a plan? How is it completed? Monitored? (P. 7)         |                                     |
| The applicant needs to confirm the proposed school will follow Lake County’s or the Sarasota County Schools’ approved school calendar. (Attachment B)    |                                     |
| Please provide a sample daily schedule for grade 8 and a copy of the master schedule for the K-8 Pinecrest Academy that is being replicated in Sarasota. |                                     |

**4. Curriculum Plan**

The Curriculum Plan section should explain not only *what* the school will teach but also *how* and *why*.

**Statutory Reference(s):**

s. 1002.33(6)(a)2.; s. 1002.33(6)(a)4.; s. 1002.33(7)(a)2.; s.1002.33(7)(a)4.

A response that meets the standard will present a curriculum plan that:

- Provides a clear and coherent framework for teaching and learning;
- Is research-based;
- Is well-aligned with the school’s mission and educational philosophy;
- Provides an emphasis on reading;
- Will enable students to attain Florida standards and receive a year’s worth of learning for each year enrolled; and
- Will be appropriate for students below, at, and above grade level.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

**Strengths (reference page numbers)**

This application describes and clearly identifies researched-based strategies and interventions for meeting the needs of all learners in all four core content areas.

The school will follow the District’s Reading Plan and support their goals through a School-Based Reading Plan. (P. 16)

Professional development plans for teachers of reading is comprehensive. (Appendix D, P. 215)

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

None.

**Concerns/Weaknesses**

The applicant is not familiar with Sarasota’s Student Progression Plan (SPP) yet states that the school will follow the district’s SPP. The school’s structure for providing reading and math interventions does not align with Sarasota’s process. (P. 12, p. 16) In addition, courses listed for middle school math, science and social studies as well as the sequence do not align with those in the district’s SPP. (P. 17-26)

| <b>Areas in Need of Additional Information and/or Clarification</b><br><i>(reference page numbers)</i>  | <b>Charter Applicant's Response</b> |
|---|-------------------------------------|
| <p>On page 16 the explanation of 90 minutes of uninterrupted daily instruction and tiered services varies from the description provided in Section 4, page 12. Please explain for both elementary and middle school students.</p> |                                     |
| <p>What course codes are used for advanced versus gifted students in ELA and Mathematics? How do you determine Intensive Reading needs versus Reading 1? (P. 18)</p>  |                                     |
| <p>How will the school require that students participate in after school tutoring? Through a parent contract? Where in the budget is funding indicated for afterschool tutoring? (P. 34)</p>                                      |                                     |

**5. Student Performance, Assessment and Evaluation**

The Student Performance, Assessment and Evaluation section should define what students attending the school should know and be able to do and reflect how the academic progress of individual students, cohorts over time, and the school as a whole will be measured.

**Statutory Reference(s):**

s. 1002.33(6)(a)3.; s.1002.33(7)(a)3.; s.1002.33(7)(a)4.; s.1002.33(7)(a)5.

**Evaluation Criteria:**

A response that meets the standard will present:

- An understanding of academic accountability provisions and goals mandated by the state.
- An indication that the applicant will hold high expectations for student academic performance.
- Measurable goals for student academic growth and improvement.
- Promotion standards that are based on high expectations and provide clear criteria for promotion from one level to the next, and for graduation (if applicable).
- Evidence that a range of valid and reliable assessments will be used to measure student performance.
- A proposed assessment plan that is sufficient to determine whether students are making adequate progress.
- Evidence of a comprehensive and effective plan to use student achievement data to inform decisions about and adjustments to the educational program.
- Plans for sharing student performance information that will keep students and parents well informed of academic progress.
- Acknowledgement of and general plan to meet FERPA requirements.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

**Strengths (reference page numbers)**

The school will set parent satisfaction goals based on the school’s Stakeholder Satisfaction Survey. (P. 37)

Stated EOC goals are appropriate – the school proposes to score above the district in Algebra, Geometry, Biology and Civics EOCs. (Pp. 36-37)

Pinecrest plans to use the same criteria for grading and report card system for elementary grades. (Pp. 41-42)

The application describes an appropriate set of actions and strategies to be implemented should achievement outcomes fall short of expectations school wide, for any group of students as well as for individual students. (Pp. 46-47)

Plans for sharing assessment and performance information with parents is varied and appropriate. (Pp. 47-48)

**Deficiencies/Concerns/Weaknesses: (*reference page numbers*)**

**Performance Goals Section:**

**Deficiencies**

The applicant does not provide sufficient evidence that the school will hold high expectations for the student academic performance of all students.

The measurable goals for student academic growth and improvements are not clearly stated in all cases.

**Concerns/Weaknesses**

K-2 performance goals are not established annually. For K-2 students 80% are expected to make learning gains from fall to spring based on iReady for 2019. Goals beyond 2019 are not apparent, unless the intent is to have a target 80% fall to spring gains each year of the charter. (P. 35)

English/Language Arts (ELA) and mathematics goals: The applicant uses the district’s average percent proficiency rates as the baseline. This is not reasonable if the school’s incoming students are presumed to be representative of the target population (discussed in Section 2). Even so, the stated goals in the application do not reflect high expectations for Sarasota’s students. (P. 36)

For example:

--- The district’s 2017 percent proficient in FSA ELA is 68.5% for grades 3-5 and 64.4% for grades 6-8. The Pinecrest school’s proposed ELA goals are 68% for 3-5 and 66% for 6-8 in Year 1. In the Palmer Ranch area, the current percent proficient in ELA is 80% for Ashton, 75% for Sarasota Middle School, and 71% for the schools, including Title I schools, within the 5-mile radius of the Palmer Ranch area. (Scores based on school grades data.)

---- In mathematics, the application’s stated goal for Year 1 is 73% proficient in grades 3-8. In this case the target is higher than the 2017 district wide baseline of 71.4%. However, the percent proficient for neighboring schools (within 5-mile radius) is 77% in grades 3-8 math. And, it is 89% for Ashton and 84% for Sarasota Middle School (based on the school grades data). The academic achievement for the charter school Imagine School at Palmer Ranch far surpasses the goals proposed for Pinecrest.

From the school model replication perspective, the ELA and math academic achievement for the Miami-Dade Pinecrest Academy schools to be replicated are in 80-95% range, significantly higher than the achievement goals proposed for the school to be replicated in Sarasota (P. 123) Again, why are Sarasota goals significantly lower?

The science goal for the proposed Sarasota school is 64%, which is 4 points higher than the district average, but 9 points lower than for the Pinecrest Academy students who are at 73% proficient or higher in 2017.

No goals are set for middle school acceleration.

**Placement and Progression Section:**

**Deficiencies**

**Concerns/Weaknesses**

The applicant proposes to follow Sarasota’s Student Progression Plan (SPP), however, the description of the course placement and progression procedures do not align with those of the district.

**Assessment and Evaluation Section:**

**Deficiencies**

**Concerns/Weaknesses**

Although the application indicates the school will follow the district’s testing calendar, and Sarasota testing calendar is included (Attachment F), the school proposes to use tests that are not part of the district’s assessment program. Sarasota does not administer the PSAT and SAT-10 is not used as a screening test. (Pp. 44-45; Attachment F)

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>  | <b>Charter Applicant’s Response</b> |
|---|-------------------------------------|
| The Sarasota baseline data for ELA is for grades 6-8 FSA-ELA, but the goal is only for grade 6. Is this a typo? (P. 36)   |                                     |
| Please clarify and explain the basis for the 2017 Pinecrest Academy data listed for each “rationale.” Is the percent proficient calculated based on the data for the two schools to be replicated? Or is it based on all Pinecrest schools? Is it an average of the schools’ percent proficient totals or is it calculated based on number of students proficient or higher across all schools? (P. 36) |                                     |
| Are the annual goals for the replication Pinecrest schools set for <b>cohorts</b> of students? Or by grade level each year? (P. 36)   |                                     |
| What is the purpose the goal that 100% of 8 <sup>th</sup> and 9 <sup>th</sup> graders will take the PSAT? Is the goal merely the <u>taking</u> of the test? (P. 37)   |                                     |

|   |  |
|---|--|
| <p>The baseline data is 2017 and the school will not open until 2019. If approved, will the applicant establish goals in the charter relative to the performance of similar Sarasota schools in the surrounding area of the proposed school and/or relative to the replication schools, in terms of meeting or exceeding the average performance?</p> |  |
| <p>Why would the K report card have a code for missing instruction in that subject (ESE only)? (P. 41)</p>  |  |
| <p>Do the Miami Pinecrest Academy schools to be replicated have Reading/Curriculum coaches on staff? (P. 46)</p>  |  |

**6. Exceptional Students**

The Exceptional Students section should demonstrate an understanding of the requirements of the school to serve all students and provide a concrete plan for meeting the broad spectrum of educational needs and providing all students with a quality education.

**Statutory Reference(s):**

s. 1002.33(16)(a)3.

**Evaluation Criteria:**

A response that meets the standard will present:

- A clear description of the programs, strategies and supports the school will provide to students with disabilities that will ensure appropriate access for students with disabilities and that the school will not discriminate based on disability.
- A clear description of how the school will ensure students with disabilities will have an equal opportunity of being selected for enrollment.
- A comprehensive and compelling plan for appropriate identification of students with special needs to ensure they are served in the least restrictive environment possible, have appropriate access to the general education curriculum and schoolwide educational, extra-curricular, and culture-building activities in the same manner as non-disabled students, receive required and appropriate support services as outlined in their Individual Education Plans and 504 plans, and participate in standardized testing.
- An understanding and commitment to collaborating with the sponsor to ensure that placement decisions for students with disabilities will be made based on each student’s unique needs through the IEP process.
- An appropriate plan for evaluating the school’s effectiveness in serving exceptional students, including gifted.
- A realistic enrollment projection (SWD) and a staffing plan that aligns with the projections.

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

**Strengths (reference page numbers)**

The applicant described the process that determines whether a student is eligible for a 504 Accommodation Plan so he/she can access FAPE. (P. 54)

The information in the application indicates a thorough understanding of the MTSS process. (P. 55)

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

None.

**Concerns/Weaknesses**

Most disconcerting is that the Pinecrest replication schools serve a very small percent of Students with Disabilities (SwD), specifically, 1.9% for the Pinecrest Cove Academy and 2.5% for the Pinecrest Academy North Campus. The school may not have the experience and knowledge to deliver the required programs and services to ESE (non-gifted) students.

The applicant states the demographic composition of the school should mirror that of the local community. They expect a population with approximately 15% students in Exceptional Student Education (ESE). Given that the applicant purports to serve students “in the surrounding areas” and/or within a 5-miles radius, the expected ESE population should mirror the target population. For schools within the 5-mile radius the percentages may be closer to 17% ESE. If the school believes it will draw primarily from select schools in the area, the percentages may be lower, 9 -13%.

It is unclear in the application which advanced/rigorous academic courses will be available to gifted and/or students requiring an accelerated course of study. (Pp. 63-65)

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>  | <b>Charter Applicant’s Response</b> |
|---|-------------------------------------|
| The Pinecrest Academy Schools to be replicated in Sarasota serve 2% to 3% of ESE students. Why is this the case? How do you plan to address the population of students with disabilities with the increased projected population in Sarasota? (P. 50)   |                                     |
| Information only. Please be aware that the sponsor will not provide district support staff to determine 504 eligibility/ineligibility for students. This is the school’s responsibility.  |                                     |
| There are concerns regarding the process of addressing LRE (Least Restrictive Environment) placement on the IEP (Individual Education Plan) on page 60. For separate class placement or “other schooling,” the applicant states that they will meet with the district ESE Department to discuss the appropriate ESE placement and will initiate the procedure in conjunction with the Sponsor. If district representation is not present, the school is solely responsible. What process will be implemented by the school-based personnel at the school? |                                     |

**7. English Language Learners**

The English Language Learners section should demonstrate an understanding of the requirements of the school to serve English Language Learner students and provide a concrete plan for meeting the broad spectrum of educational needs and providing all students with a quality education.

**Statutory Reference(s):**

s. 1002.33(10)(f)

**Evaluation Criteria:**

A response that meets the standard will present:

- Demonstrated understanding of legal obligations regarding the education of English Language Learners.
- A comprehensive and compelling plan for educating English Language Learner students that reflect the full range of programs and services required to provide all students with a high-quality education.
- A clear plan for monitoring and evaluating the progress of ELL students, including exiting students from ELL services.
- Demonstrated capacity to meet the school’s obligations under state and federal law regarding the education of English Language Learners.
- A realistic enrollment projection (ELL) and a staffing plan that aligns with the projections.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

**Strengths (reference page numbers)**

The applicant demonstrates a desire to meet state and federal requirements and to meet the linguistic and academic needs of English Language Learner (ELL) students. (P. 67)

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

None.

**Concerns/Weaknesses**

Although the applicant states it will follow the Sarasota District ELL Plan, certain procedures, the function of ELL committee, intervention models and assessments described in the application do not align to those in the District’s ELL Plan. (Pp. 67-69)

In the application, certain procedures will be completed by various school staff members, however, there is no mention of the ESOL Liaison’s role in the process, as described in the district ELL plan. (P. 68)

The school plans to use the HLA model as the intervention strategy for all elementary ELL students. Teachers monitor students' progress in their home language. It is a good model, however, it is not employed in Sarasota. The issue, again, is that the applicant proposes to follow the procedures in the district plan yet the procedures described in the application are different. (Pp. 68-69)

The ESOL Exit Criteria (copied from FLDOE sources) is outdated. (P. 72)

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>  | <b>Charter Applicant's Response</b> |
|---|-------------------------------------|
| Who designs the Curriculum Content in Home Language? (P. 69)  |                                     |
| What is the rationale for determining that HLA is the most appropriate intervention. What personnel will deliver this intervention? (P. 69)   |                                     |
| Briefly explain why various personnel have different programmatic responsibilities for ELL services rather than the ESOL Coordinator. (P. 73) |                                     |

**8. School Culture and Discipline**

The School Climate and Discipline section should describe the learning environment of the school and provide evidence that the school will ensure a safe environment conducive to learning.

**Statutory Reference(s):**

s. 1002.33(7)(a)7.; s. 1002.33(7)(a)11.

**Evaluation Criteria:**

A response that meets the standard will present:

- A planned school culture that is consistent with the school’s mission and congruent with the student discipline policy.
- An approach to classroom management and student discipline that is consistent with the overall school culture and philosophy.
- Recognition of legal obligations and children’s rights related to enforcing student discipline, suspension, and recommended expulsion, including the school’s code of conduct, if available.
- Consideration of how the code of conduct will apply to students with special needs.
- Appropriate and clear roles of school administrators, teachers, staff, and the governing board regarding discipline policy implementation.

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

|  |
|--|
| <p><b>Strengths (reference page numbers)</b></p> <p>The school plans to implement research-based systems of positive behavior support (PBS) to create a school-wide learning environment that promotes and aligns with the school’s mission.</p> <p>The school plans to implement RtIB/MTSS to provide a continuum of tiered interventions with increasing levels of intensity and duration based on the needs of the students. (P. 74)</p> <p>The school is going to follow the Sarasota County Schools’ Code of Conduct. (P. 75)</p> |
|--|

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|--|
| <p><b>Deficiencies/Concerns/Weaknesses: (reference page numbers)</b></p> <p><b>Deficiencies</b></p> <p>None.</p> |
|--|

**Concerns/Weaknesses**

The description of the due process procedures for a student who is suspended or recommended for expulsion and the appeals process that the school will employ lacks substance. The response states that procedures in the Sarasota Code of Student Conduct will be followed and that students will be afforded due process as per the Sarasota Code of Conduct. (P. 77)

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>  | <b>Charter Applicant's Response</b> |
|---|-------------------------------------|
| Describe the procedures and guidelines that will be followed to dismiss a student who is not meeting the behavioral expectations of the school. (P. 77) |                                     |

**9. Supplemental Programming**

The Supplemental Programming section should describe extra and co-curricular activities offered by the school. This section is optional.

**Statutory Reference(s):**

NA

**Evaluation Criteria:**

A response that meets the standard will present:

- A clear description of extra- and co-curricular activities that support, and do not detract from, the educational program.
- Evidence of an adequate funding source for extra- and co-curricular activities.
- Lack of supplemental programming may not be a basis for denial.

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

|   |
|---|
| <b>Strengths (reference page numbers)</b>   |
| The school plans to offer STEM related activities such as Robotics Club, Future City, as well as arts related clubs and extracurricular activities. (Pp. 78-79) |
| The After Care Program funds will help to cover some expenses for co-curricular activities and after-school tutoring. (P. 79)                                   |

|   |
|---|
| <b>Deficiencies/Concerns/Weaknesses: (reference page numbers)</b> |
| None.   |

|  |                                     |
|--|-------------------------------------|
| <b>Areas in Need of Additional Information and/or Clarification (reference page numbers)</b> | <b>Charter Applicant’s Response</b> |
| None.  |                                     |

## II. Organizational Plan

The Organizational Plan should provide an understanding of how the school will be governed and managed. It should present a clear picture of the school’s governance and management priorities, what responsibilities various groups and people will have, and how those groups will relate to one another.

### 10. Governance

The Governance section should describe how the policy-making and oversight function of the school will be structured and operate.

#### Statutory Reference(s):

s. 1002.33(7)(a)15.; s. 1002.33(9)

#### Evaluation Criteria:

A response that meets the standard will present:

- A governing board that is legally structured, or has a plan to organize in conformity with the laws of Florida.
- A clear description of the governing board’s roles, powers, and duties that are consistent with overseeing the academic, organizational, and financial success of the school.
- Appropriate delineation between governance and school management roles.
- At least the core of the Governing Board is identified that has a wide range of knowledge and skills needed to oversee a charter school.
- A board structure (e.g. bylaws and policies concerning member selection, committees, meeting frequency) that supports sustainable and effective school governance.
- Evidence that applicant understands and intends to implement open meeting and records laws.
- Clear policy and plan for dealing with conflicts of interest.
- Appropriate and clear role for any advisory bodies or councils if included.
- An outline of a grievance process (or policy) that will simultaneously address parent or student concerns and preserve appropriate governance and management roles.

| CRC Rating         | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|--------------------|-------------------------------------|------------------------------|----------------------------|
| <b>Preliminary</b> | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| <b>Final</b>       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

#### **Strengths** *(reference page numbers)*

The Bylaws, Grievance Policy, Conflict of Interest Policy, as well as Roles, Duties, and Powers are clearly written, delineated, and within legislative recommendations. (Pp. 80-81; Attachments H-K)

The applicant oversees 11 other Pinecrest Academy schools in Florida and obviously has much experience in the governance of charter schools.

The schedule of board meetings and minutes are appropriately noticed and posted on the Pinecrest Academy, Inc. website.

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

None.

**Concerns/Weaknesses**

Pinecrest Academy Gulf Coast governing board members will NOT be Sarasota County residents (Pp. 83-83), which is permissible under state statute but of great concern to the CRC. The CRC strongly believes that it is in the best interest of the parents/students served that governance and oversight of the proposed “Community School” be under the direction of local board members who understand the needs of its stakeholders and meet in the community.

With one exception, the board members information sheets were copied from another county’s application last year and each identifies a different school, the “*Pinecrest Collegiate Academy*” as the proposed school for Sarasota. (*Board Member Information Sheets*)

Parents who have a concern or grievance, if not resolved by the school principal, are required to contact Academica, the ESP. Academica then puts the parent in contact with the “board appointed parent liaison for your school.” Parents who wish to address the board must submit their concern in writing to Academica 3 days before the scheduled board meeting. Not listed on the application, however, the last step in the parent grievance procedures for the Miami schools is to advise parents to contact the district’s charter office! (P. 87)

**Addenda: ESP – Chart of Responsibilities (noted here as it describes some hierarchal info)**

ESP does not appear to employ but rather provide curricular and human resource assistance.

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>                       | <b>Charter Applicant’s Response</b> |
|--|-------------------------------------|
| Will the appointment parent representative and the principal of the proposed Sarasota school attend meetings in Miami? |                                     |
| How many school board meetings will be held in Sarasota County?<br>(P.82)  |                                     |
| Please provide the resume for Mr. Carlos Alvarez.  |                                     |

|  |  |
|--|--|
| <p>Please indicate whether Mr. Carlos Alvarez currently or have previously served on a board of a school district, another charter school, a non-public school or any not-for-profit corporation. If yes, explain.</p> |  |
| <p>Please provide a copy of the Pinecrest Academy, Inc. BOD minutes that shows the agenda item to submit a new Pinecrest charter school application for Sarasota County and the motion to approve the application.</p> |  |

**11. Management and Staffing**

The Management and Staffing section should describe how the day-to-day administration of the school’s operations will be structured and fulfilled.

**Statutory Reference(s):**

s. 1002.33(7)(a)9.; s. 1002.33(7)(a)14.

**Evaluation Criteria:**

A response that meets the standard will present:

- An organizational chart or charts that clearly and appropriately delineate lines of authority and reporting.
- A management structure that includes clear delineation of roles and responsibilities for administering the day-to-day activities of the school.
- Identification of a highly-qualified school leader or a sound plan for the recruitment and selection of the school leader.
- A viable and adequate staffing plan.
- A sound plan for recruiting and retaining highly-qualified and appropriately-certified instructional staff.

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

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|--|
| <b>Strengths (reference page numbers)</b>  |
| The application meets all of the evaluation criteria related to organizational structure and reporting lines, job requirements, recruitment and hiring protocol. (Pp. 88-89) |
| The staffing plan is adequate and realistic.   |

|   |
|---|
| <b>Deficiencies/Concerns/Weaknesses: (reference page numbers)</b> |
| None.   |

|  |                                     |
|--|-------------------------------------|
| <b>Areas in Need of Additional Information and/or Clarification (reference page numbers)</b> | <b>Charter Applicant’s Response</b> |
| None.  |                                     |

**12. Human Resources and Employment**

The Human Resources and Employment section should define the policies and procedures that frame the school’s relationship with its staff.

**Statutory Reference(s):**

s. 1002.33(7)(a)14.; s. 1002.33(12)

**Evaluation Criteria:**

A response that meets the standard will present:

- A clear explanation of the relationship between employees and the school.
- Description of the school leader and teacher evaluation plans, or outline of such plans, which align with the Student Success Act as defined by state law.
- A compensation and benefits plan or outline of such a plan that is aligned with Florida’s Student Success Act, and will attract and retain quality staff.
- Procedures that are likely to result in the hiring of highly-effective personnel.
- Policies and procedures that hold staff to high professional standards or a plan to develop such policies and procedures.
- An effective plan to address any leadership or staff turnover.

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

|  |
|--|
| <b>Strengths</b> <i>(reference page numbers)</i>   |
| The budget supports the staffing plan and sufficient funding is allocated for benefits. Salaries are reasonable and will be competitive in the Sarasota County area. (Pp. 94-95) |

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|--|
| <b>Deficiencies/Concerns/Weaknesses:</b> <i>(reference page numbers)</i>   |
| <b>Deficiencies</b><br>None.   |
| <b>Concerns/Weaknesses</b><br>Comment Only: The application contains narrative copied verbatim from state documents related to the requirements for administrator and teacher evaluation as per the Student Success Act. (Pp. 92-94) |

|  |                                     |
|--|-------------------------------------|
| <b>Areas in Need of Additional Information and/or Clarification</b><br><i>(reference page numbers)</i> | <b>Charter Applicant’s Response</b> |
| None.  |                                     |

**13. Professional Development**

The Professional Development section should clearly describe the proposed expectations and opportunities for administrators, teachers, and other relevant personnel.

**Statutory Reference(s):**

NA

**Evaluation Criteria:**

A response that meets the standard will present:

- Professional development activities for administrators and instructional staff that align with the educational program and support continual professional growth as well as growth in responsibilities related to specific job descriptions.

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

| <b>Strengths (reference page numbers)</b>  |
|--|
| <p>The Pinecrest Leadership Coalition meets monthly to share best practices and design professional development to align curriculum and instruction among all Pinecrest school sites. (P. 98)</p> <p>The application describes a comprehensive and relevant plan and program for the professional development of teachers and staff as well as leadership development for principals and school administrators. (Pp. 98-101)</p> |

| <b>Deficiencies/Concerns/Weaknesses: (reference page numbers)</b> |
|---|
| None.   |

| <b>Areas in Need of Additional Information and/or Clarification (reference page numbers)</b> | <b>Charter Applicant’s Response</b> |
|--|-------------------------------------|
| None.  |                                     |

**14. Student Recruitment and Enrollment**

The Student Recruitment and Enrollment section should describe how the school will attract and enroll its student body.

**Statutory Reference(s):**

s. 1002.33(7)(a)7.; s. 1002.33.(7)(a)8.; s. 1002.33(10)

**Evaluation Criteria:**

A response that meets the standard will present:

- A student recruitment plan that will enable the school to attract its targeted population.
- An enrollment and admissions process that is open, fair, and in accordance with applicable law.
- A plan and process that will likely result in the school meeting its enrollment projections.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

**Strengths** (*reference page numbers*)

**Deficiencies/Concerns/Weaknesses:** (*reference page numbers*)

**Deficiencies**  
 The application does not provide a description of the lottery process to be used should the number of applications exceed the number of available seats. (P. 103)

The responses lack essential detail, therefore it cannot be determined if the school will have an enrollment and admissions process that is open, fair, and in accordance with applicable law. (P. 103)

**Concerns/Weaknesses**  
 The applicant lists the allowable enrollment preferences as stated in s. 1002.33(10)(d), F.S., (e.g., siblings, employee’s children, etc). The committee is clear on the preferences. What is not clear is whether or not the school will limit the enrollment process to a specific student population in accordance with (10)(e). The articulation provision option does not make sense. (P. 103)

| <b>Areas in Need of Additional Information and/or Clarification</b><br><i>(reference page numbers)</i>  | <b>Charter Applicant's Response</b> |
|---|-------------------------------------|
| Please state clearly if the school will limit the enrollment process to a specific student population as defined in s. 1002.33(10)(e), F.S. and, if so, which one. If it's "reasonable distance," please state the distance (5-mile radius or 15-mile radius or other?). (P. 103) |                                     |
| Briefly describe the procedures that will be followed if a lottery is conducted to award students an open seat and place students on the wait list.   |                                     |
| Please provide a copy of the current lottery policy used for the replication schools in Miami-Dade (P. 104)   |                                     |
| Do you have the articulation provision set up from another charter school application? (P. 103)   |                                     |

**15. Parent and Community Involvement**

The Parent and Community Involvement section should provide a broad overview of the school’s plans to encourage and support parental and community involvement.

**Statutory Reference(s):**

NA

**Evaluation Criteria:**

A response that meets the standard will present:

- A general conception of how parents will be involved with the school that aligns with the school’s mission and provisions of the educational program. A detailed plan may be developed following approval.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

**Strengths (reference page numbers)**

The school’s plan to engage and involve parents and community members once the school is open is comprehensive and well-rounded. (P. 105)

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

None.

**Concerns/Weaknesses**

The information in the application is vague related to planned partnerships with community organizations, businesses or other agencies. There is not a meaningful discussion of how these might come about, their nature, purpose, etc. (P. 106)

The applicant provides no evidence of demand for the school or support from intended community partners or families. The applicant submits the demographic and site-planning maps and Building Hope data used for enrollment projections as evidence of community need or parent interest in the proposed school. No apparent attempt was made by the applicant to see if the proposed school is a good fit for Sarasota. (P. 106, Attachment T)

| <b>Areas in Need of Additional Information and/or Clarification</b><br><i>(reference page numbers)</i> | <b>Charter Applicant's Response</b> |
|--|-------------------------------------|
| None.  |                                     |

### III. Business Plan

The Business Plan should provide an understanding of how the charter operators intend to manage the school’s finances. It should present a clear picture of the school’s financial viability including the soundness of revenue projections; expenditure requirements; and how well the school’s budget aligns with and supports effective implementation of the educational program.

#### 16. Facilities

The Facilities section should provide an understanding of the school’s anticipated facilities needs and how the school plans to meet those needs.

#### Statutory Reference(s):

s. 1002.33(7)(a)13.; s. 1002.33(18)

#### Evaluation Criteria:

If a facility is acquired, reviewers will look for:

- Evidence that the proposed facility complies with all applicable laws, regulations, and policies and can be ready for the school’s opening OR a timeline to ensure the facility will be in compliance and ready by school’s opening.
- A facility that is appropriate and adequate for the school’s program and targeted population.
- Evidence that the school has the necessary resources to fund the facilities plan.
- A reasonable back-up plan should the proposed facility plan fall through.

If a facility is not yet acquired, reviewers will look for:

- A realistic sense of facility needs.
- A plan and timeline for securing a facility that is appropriate and adequate for the school’s program and targeted population.
- Reasonable projections of facility requirements.
- Evidence that the school has the necessary resources to fund the facilities plan.
- Adequate facilities budget based on demonstrated understanding of fair market costs.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

#### Strengths *(reference page numbers)*

The applicant is planning on utilizing an experienced charter school facilities developer. (P 107)

The developer has provided historical data on the size and costs of the proposed facility as well as forecasts of lease conditions. (Pp. 107-108)

|   |
|---|
| <p><b>Deficiencies/Concerns/Weaknesses: <i>(reference page numbers)</i></b></p> <p><b><u>Deficiencies</u></b><br/>None.</p> <p><b><u>Concerns/Weaknesses</u></b><br/>The application does not fully explain the school’s facility needs, including desired location, size, and layout of space. The response is to state that they will engage a facilities developer to make sure everything is appropriate. (P. 107)</p> <p>The applicant did not provide any detail on the number and types of spaces and the layout of the space to be provided in the facilities. The response in the application is basically that the facility will have adequate numbers of classrooms and other education program areas. One must assume that they have considered all the accessory spaces such as offices, electrical &amp; mechanical spaces, custodial, etc. (P. 107)</p> <p>Although the applicant states in earlier sections of the application that the board is considering the Palmer Ranch area, and provides detailed geographical maps of the area, the applicant provided no information as to possible lease sites in the targeted area for lease. If there are no available leases in the area, building from ground up might not be possible in the time frame quoted.</p> <p>Other than stating that the board will direct the ESP to find an experienced developer or to locate alternative facilities, the application does not provide a back-up facilities plan. (P. 109)</p> |
|---|

| <b>Areas in Need of Additional Information and/or Clarification<br/><i>(reference page numbers)</i></b>   | <b>Charter Applicant’s Response</b> |
|---|-------------------------------------|
| Please provide a layout of the space and delineate the number of classrooms and learning spaces, offices, etc. to accommodate the needs of a school of 800+ students. |                                     |
| Please outline a plan of action (beyond directing the Academica Management, LLC.) for back-up facilities. (P. 109)  |                                     |

**17. Transportation**

The Transportation section should describe how the school will address these services for its student body.

**Statutory Reference(s):**

s. 1002.33(20)

**Evaluation Criteria:**

A response that meets the standard will present:

- An outline of a reasonable transportation plan that serves all eligible students and will not be a barrier to access for students residing within a reasonable distance of the school.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

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| <b>Strengths (reference page numbers)</b>  |
| The application references a few of the regulations required for transportation services. (P. 110) |

|   |
|---|
| <b>Deficiencies/Concerns/Weaknesses: (reference page numbers)</b>   |
| <p><b>Deficiencies</b><br/>No plan or outline of a plan is provided. The application references Florida Statutes and law pertaining to transportation and lists all of the options, but does not describe what the plan will consist of. Given that the proposed school will be a replication of existing schools, this lack of information is unacceptable. (P. 110)</p> <p><b>Concerns/Weaknesses</b><br/>No mention how the charter will report inspections, etc. to the District. No mention of driver requirements or obligations per law to the District.</p> |

|  |                                     |
|--|-------------------------------------|
| <b>Areas in Need of Additional Information and/or Clarification (reference page numbers)</b> | <b>Charter Applicant’s Response</b> |
| What, exactly, is the plan? (P. 110)   |                                     |

|   |  |
|---|--|
| How is transportation provided in the replication schools? What percent of the parents have a Parent Transportation Agreement in place? |  |
|---|--|

**18. Food Service**

The Food Service section should describe how the school will address these services for its student body.

**Statutory Reference(s):**

s. 1002.33(20)(a)1.

**Evaluation Criteria:**

A response that meets the standard will present:

- A food service plan that will serve all students and makes particular provisions for those students who may qualify for free or reduced price lunch.
- A food service plan that places an emphasis on quality, healthy foods.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

**Strengths (reference page numbers)**

The school understands the requirements of the Free & Reduced meal application process. Pinecrest Academy states that it will solicit a contractor to prepare and provide meals. (P. 111)

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

None.

**Concerns/Weaknesses**

The narrative states that the school will either prepare its own food or contract out for food services. The plan is unknown. (P. 111)

According the budget, the school will prepare its own food; however, the revenues do not cover the expenditures. (P. 111)

| <b>Areas in Need of Additional Information and/or Clarification</b><br><i>(reference page numbers)</i>  | <b>Charter Applicant's Response</b> |
|---|-------------------------------------|
| Do the other Pinecrest Academy schools contract with an independent provider?   |                                     |
| What is the anticipated cost for contracting out for food services?<br>Please indicate where in the budget the revenues to cover food service expenses are shown. |                                     |

**19. School Safety and Security**

The School Safety and Security section should provide a description of the school’s plan to ensure the safety and security of its students and faculty.

**Statutory Reference(s):**

s. 1002.33(7)(a)11.

**Evaluation Criteria:**

A response that meets the standard will present:

- A plan that will reasonably ensure the safety of students and staff and the protection of the school facility and property. Note that a fully-developed plan will be completed upon approval of the application.

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

|  |
|--|
| <b>Strengths (reference page numbers)</b>  |
| The Pinecrest Academy Inc. already has a comprehensive and solid safety and security plan currently used in the other Pinecrest Academy schools that will also be adopted for the proposed school in Sarasota. (P. 112; Appendix FF) |

|   |
|---|
| <b>Deficiencies/Concerns/Weaknesses: (reference page numbers)</b> |
| None.   |

|  |                                     |
|--|-------------------------------------|
| <b>Areas in Need of Additional Information and/or Clarification (reference page numbers)</b> | <b>Charter Applicant’s Response</b> |
| None.  |                                     |

**20. Budget**

The Budget section should provide financial projections for the school over the term of its charter.

**Statutory Reference(s):**

s. 1002.33(6)(a)5.; s. 1002.33(6)(b)2.

**Evaluation Criteria:**

A response that meets the standard will present:

- Budgetary projections that are consistent with and support all key aspects of the application, including the school’s mission, educational program, staffing plan, and facility.
- A realistic assessment of projected sources of revenue and expenses that ensure the financial viability of the school.
- A sound plan to adjust the budget should revenues not materialize as planned.

| CRC Rating  | Meets the Standard       | Partially Meets the Standard        | Does Not Meet the Standard |
|-------------|--------------------------|-------------------------------------|----------------------------|
| Preliminary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>   |

**Strengths (reference page numbers)**

The application includes well-prepared budget documents that, for the most part, provide appropriate budget projections to support the proposed programs, staffing and operations of the school. (P. 113 and Attachments X-Z)

The applicant provided a letter of assurance from Building Hope as evidence of funding that will be available for the facilities.

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

None.

**Concerns/Weaknesses**

The proposed budget includes Capital Outlay Revenue. Although the school would be eligible, Capital Outlay funding is never guaranteed. Without this funding, the proposed school would be unable to make its lease payment obligation and therefore the budget would show a funds deficit. (P. 433)

Additional expenses for the SAT-10 and PSAT test may not have been considered in the budget. It is the CRC’s understanding that the Miami Pinecrest Academy schools have the option of administering the SAT-10 at no cost because it is part of the MDCPS testing program.

The Budget states that the school will contract for or prepare and manage its own food service program; however, the revenues do not cover the expenditures. (P. 111)

In the contingency plan for lower than expected student enrollment, the budgets for 75% and 50% of revenue projections show the elimination of school security staff. This is a concern. (P. 435 & 440)

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>  | <b>Charter Applicant's Response</b> |
|---|-------------------------------------|
| Where in the submitted budget is evidence of adequate funding for food services?  |                                     |
| What is the rationale for eliminating the security personnel in the 75% and 50% enrollment shortage budget. (P. 435 & 440)  |                                     |
| What assurances does the Pinecrest Academy, Inc. board have that capital outlay funds will be available for the proposed Gulf Coast school in Sarasota?   |                                     |
| The instructional materials, programs and tests proposed for use are costly (e.g., iReady, PLTW, PSAT, SAT-10). Does the board have contracts with vendors/publishers for all Pinecrest Academy schools that perhaps allows for volume discount or more economical pricing? |                                     |

**21. Financial Management and Oversight**

The Financial Management and Oversight section should describe how the school’s finances will be managed and who will be responsible for the protection of student and financial records.

**Statutory Reference(s):**

s. 1002.33(6)(a)5.; s. 1002.33(7)(a)9.; s. 1002.33(7)(a)11.

**Evaluation Criteria:**

A response that meets the standard will present:

- A clear description of how the school’s finances will be managed, including who (or what contracted entity) will manage the finances. Such plan should contain strong internal controls to ensure appropriate fiscal management and ability to comply with all financial reporting requirements.
- A plan for the governing board to regularly exercise oversight over and take accountability for all financial operations of the school.
- Provisions for an annual financial audit.
- Appropriate public transparency of school financial health.
- Appropriate plan to securely store financial records.
- A plan to obtain appropriate and reasonable insurance coverage.

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

| <b>Strengths (reference page numbers)</b>  |
|--|
| The application provides evidence of proper and regular oversight on the part of the governing board. Evidence of strong internal controls for fiscal management is provided in the application. (Pp. 114-117) |
| The insurance coverage and insurance limits are appropriate and addressed in the budget. (P. 119)  |

| <b>Deficiencies/Concerns/Weaknesses: (reference page numbers)</b> |
|---|
| None.   |

| <b>Areas in Need of Additional Information and/or Clarification (reference page numbers)</b> | <b>Charter Applicant’s Response</b> |
|--|-------------------------------------|
| None.  |                                     |

**22. Start-Up Plan**

The Start-Up Plan should provide a clear roadmap of the steps and strategies that will be employed to prepare the school to be ready to serve its students well on the first day of operation.

**Statutory Reference(s):**

s. 1002.33(7)(a)16.

**Evaluation Criteria:**

A response that meets the standard will present an action plan that:

- Provides a thoughtful and realistic implementation plan that covers major operational items and provides flexibility for addressing unanticipated events.

| CRC Rating  | Meets the Standard                  | Partially Meets the Standard | Does Not Meet the Standard |
|-------------|-------------------------------------|------------------------------|----------------------------|
| Preliminary | <input checked="" type="checkbox"/> | <input type="checkbox"/>     | <input type="checkbox"/>   |
| Final       | <input type="checkbox"/>            | <input type="checkbox"/>     | <input type="checkbox"/>   |

| <b>Strengths</b> <i>(reference page numbers)</i>   |
|--|
| The start-up plan for key activities is appropriate and realistic. (Pp. 121-122)<br><br>The applicant has deferred the opening of other approved applications in other counties, providing assurance that plans may change and time lines adjusted if necessary. |

| <b>Deficiencies/Concerns/Weaknesses:</b> <i>(reference page numbers)</i> |
|--|
| None.  |

| <b>Areas in Need of Additional Information and/or Clarification</b> <i>(reference page numbers)</i> | <b>Charter Applicant’s Response</b> |
|---|-------------------------------------|
| None.   |                                     |

**Addendum**

**Addendum A: Replications**

The Replications section should identify the school to be replicated and provide evidence that the model has been successful in raising student achievement, while also describing the capacity of the organization to operate an additional school.

**Statutory Reference(s):**

s. 1002.33(6)

**Evaluation Criteria:**

A response that meets the standard will present an action plan that:

- Evidence that school or model to be replicated demonstrates academic, organizational, and financial success.
- A clear, compelling vision for what is being replicated in terms of essential components of the educational program.
- A convincing rationale for how the school or model to be replicated will successfully serve the proposed target student population.
- A strong justification for changing key components of the original school or model in the proposed school. Such justification should include why the changes will better suit the targeted student population and whether the model is still similar enough to the existing model that comparable successful outcomes are likely.
- Evidence that the applicant group has a sound plan for developing the capacity to replicate an existing school including adequate financial and human resources.
- If applicable, evidence of successful past replications or lessons learned from unsuccessful attempts at replication that will increase the probability that this replication will be successful.

| <b>CRC Rating</b>  | <b>Meets the Standard</b> | <b>Partially Meets the Standard</b> | <b>Does Not Meet the Standard</b> | <b>Not Applicable</b>    |
|--------------------|---------------------------|-------------------------------------|-----------------------------------|--------------------------|
| <b>Preliminary</b> | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>          | <input type="checkbox"/> |
| <b>Final</b>       | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>          | <input type="checkbox"/> |

**Strengths (reference page numbers)**

The same governing board, Pinecrest Academy, Inc., that currently operates 11 schools in Florida will be the board for Pinecrest Academy Gulf Coast, the proposed Sarasota school. The board has 7 other approved Pinecrest Academies scheduled to open in 2018 or 2019.

The two K-8 schools to be replicated, Pinecrest Academy - North Campus (MSID 5048) and Pinecrest Cove Academy (MSID 5049) are high performing, A-rated schools in Miami-Dade County.

Comment Only: The Pinecrest Academy Gulf Coast Sarasota school will also be managed by the Academica Management, LLC, an Education Service Provider (ESP) who manages over 60 charter schools in Florida.

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

Weak and non-compelling evidence is given that the school or model to be replicated consistently demonstrates academic success for all students. Not all Pinecrest Academy schools are A-rated schools. The schools in Orange County - the Pinecrest Prep Charter is a C school and the Pinecrest Creek school received Fs in its first two years, then C and finally received a B-rating in 2017. (FLDOE 2017 School Grades)

The independent financial audit resulted in findings for the Pinecrest Academy (North Campus) site, the school to be replicated. No explanation is provided. (See Applicant History Worksheet)

**Concerns/Weaknesses**

In the discussion of prior replication efforts, the applicant does not provide an explanation for a school closure, delays or postponements in opening schools. On page 126 it states that they expanded to Orange County in 2010. One school in Orange County (Pinecrest Prep Orlando Campus) closed yet no explanation is offered, as required, in the Applicant History Worksheet. We believe it was due to insufficient enrollment.

It also states that the first school in Lake County opened in 2017-18, however, we believe that opening was deferred to 2018 and deferred again to 2019. As a possible explanation for challenges in expanding to new areas (and perhaps the deferred openings) the applicant suggests that it is the challenge of finding high quality instructional leaders. Other than the Pinecrest Principals Coalition that mentors new principals, there is no explanation on how the board will avoid delay in opening in Sarasota.

The applicant does not provide a convincing rationale for how the school or model to be replicated will successfully serve the proposed target student population in Sarasota. Specifically, the applicant does not fully address how the target population for the Sarasota proposed school compares with the population currently being served in the Miami-Dade schools. As noted in prior sections, the demographics of the target population in Sarasota, whether based on district-wide data or for the Palmer Ranch area, are considerably different in terms of the percent of Students with Disabilities, ELL and race/ethnicity composition.

As pointed out in previous sections, the evaluation of this application found several areas of misalignment in what the application describes as the educational program and services for the Pinecrest Academy model schools and what is proposed for the Sarasota school application. The applicant states that the school will follow the district Student Progression Plan, the district's LEP plan, the district's reading plan, the district's assessment program. On page 125 of the application, it states that "changes to the model will come only if mandated by the Sponsor and/or adopted material from the Sponsor." If this occurs, the current school model will be substantially different from the schools to be replicated. The only anticipated modifications and adjustments offered by the applicant relate to staffing.

The ESE service model in Miami-Dade is not being replicated in Sarasota. It is the CRC's understanding that in Miami-Dade, the central office provides ESE services to the school. In Sarasota, charter schools receive IDEA funding and are responsible for ensuring that ESE students

receive appropriate services. The applicant may not have the expertise/experience to serve students here; it is not the same “student services” model.

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>  | <b>Charter Applicant’s Response</b> |
|---|-------------------------------------|
| Why did the board elect to replicate the Pinecrest Cove Academy and the Pinecrest Academy - North Campus schools as opposed to the other schools? |                                     |
| What is reason for the deferred school opening for the Lake County school and some of the other schools approved in 2017?                         |                                     |
| How many Pinecrest Schools does the board oversee? The executive summary states 9, page 123 states 11, page 125 states 10 schools.                |                                     |
| Please correct errors and clarify questions on the Applicant History Worksheet and re-submit document. See the comments on the worksheet.         |                                     |

**Addendum A1: High-Performing Replications [THIS SECTION IS NOT APPLICABLE.]**

The High-Performing Replications section should identify the school to be replicated and provide evidence that the proposed school meets the statutory requirements of being a substantially similar model of a school that has been designated as a High-Performing Charter School and is being established and operated by an organization or individuals that were significantly involved in the operation of the school being replicated.

**Statutory Reference(s):**

s. 1002.331

**Evaluation Criteria:**

A response that meets the standard will present an action plan that:

- Evidence that the applicant’s school and the school to be replicated (if different) are designated by the Commissioner of Education as a High-Performing Charter School.
- Evidence that the proposed school will be substantially similar to the high-performing school that is being replicated. Reviewers should base this determination on the response to this question as well applicant’s proposed educational, organization, and business plans as described throughout the application.
- Evidence that the organization or individuals involved in the establishment and operation of the proposed school are significantly involved in the operation of the high-performing school that is being replicated.

| <b>CRC Rating</b>  | <b>Not Applicable</b>               | <b>Meets the Standard</b> | <b>Partially Meets the Standard</b> | <b>Does Not Meet the Standard</b> |
|--------------------|-------------------------------------|---------------------------|-------------------------------------|-----------------------------------|
| <b>Preliminary</b> | <input checked="" type="checkbox"/> | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>          |
| <b>Final</b>       | <input checked="" type="checkbox"/> | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>          |

|  |
|--|
| <b>Strengths</b> <i>(reference page numbers)</i> |
| N/A  |

|  |
|--|
| <b>Deficiencies/Concerns/Weaknesses:</b> <i>(reference page numbers)</i> |
| N/A  |

|   |                                     |
|---|-------------------------------------|
| <b>Areas in Need of Additional Information and/or Clarification</b> <i>(reference page numbers)</i> | <b>Charter Applicant’s Response</b> |
| N/A   |                                     |

**Addendum B: Education Service Providers**

The ESP section should provide a rationale for contracting with the ESP, evidence of ESP success in operating high-quality charter schools, the capacity of the ESP to successfully operate this school, and evidence that the governing board and ESP are able to operate free from conflicts of interest.

**Statutory Reference(s):**

s. 1002.33(6)(a)

**Evaluation Criteria:**

A response that meets the standard will present an action plan that:

- A clear explanation of the reasons for contracting with an education service provider and how and why the ESP was selected and a description of the due diligence employed to assess the capacity of the ESP.
- Sufficient evidence of the ESP’s previous academic, organizational, and financial success and capacity for future success that make it more likely than not that it will be successful with the proposed school.
- Evidence of the ESP’s organizational capacity to manage an additional school or schools as determined by its growth plan.
- A comprehensive list (Form IEPC-MIA) of all schools affiliated with the ESP and ensuing performance data used to support the selection of the ESP (past and current).
- Evidence of success working with similar populations to the target population. If there are deficiencies or lack of experience working with the target populations, then reviewers will look for a sufficient explanation of programmatic adjustments that will be made to ensure success with any new school(s).
- A clear delineation of the roles and responsibilities and decision-making authority of the school’s governing board and the ESP, structured to ensure a clearly defined arm’s-length, performance-based relationship that is free from conflicts of interest. This includes evidence that the school’s governing board has a clear plan for holding the ESP accountable for negotiated performance.
- A clear delineation of the term of the management agreement, the conditions, grounds and procedures by which the agreement may be renewed and terminated, and a plan for continued operation of the school in the event of termination.
- A draft of the proposed contract with all key terms included.

| <b>CRC Rating</b>  | <b>Meets the Standard</b> | <b>Partially Meets the Standard</b> | <b>Does Not Meet the Standard</b> |
|--------------------|---------------------------|-------------------------------------|-----------------------------------|
| <b>Preliminary</b> | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>          |
| <b>Final</b>       | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>          |

**Strengths (reference page numbers)**

Academica Management, LLC. has been in business for over 20 years serving charter schools in Florida and 5 other states.

The proposed charter contract meets contract requirements. (Attachment EE)

**Deficiencies/Concerns/Weaknesses: (reference page numbers)**

**Deficiencies**

Academica provides educational program services, curriculum development, intervention programs, and professional development for its schools. Granted, the majority of schools are achieving at high levels, however, it is of concern that 5 Florida schools are rated D/F and 20 received a grade of C.

The independent financial audit resulted in findings for the Pinecrest Academy (North Campus) school, the school to be replicated. Twenty-one (21) other Academica managed charter schools in Florida had audit findings in 2017. (See Applicant History Worksheet) The ESP services include financial reporting, records management, bookkeeping and accounting services.

The ESP’s capacity to manage an additional school or schools may be questionable. Several schools have not opened as originally planned in the charter application approved by the local sponsor.

**Concerns/Weaknesses**

As documented, the arm’s-length, performance-based relationship is free from conflicts of interest as structured with the Pinecrest Academy Inc. governing board. However, Academica is responsible for the recruiting, interviewing and candidate recommendations. The ESP also assists in the performance appraisal for the school leaders. Members of the board have served as principals or are involved in some capacity at other Academica-managed schools, raising questions as to the true arm’s length relationship.

| <b>Areas in Need of Additional Information and/or Clarification<br/>(reference page numbers)</b>                                 | <b>Charter Applicant’s Response</b> |
|--|-------------------------------------|
| What other governing boards do the Pinecrest Academy, Inc. board members serve on that contract with Academica?                  |                                     |
| Are any of the current Pinecrest Academy, Inc. board members also employees/staff of other charter schools managed by Academica? |                                     |

**Applicant History Worksheets (Form IEPC-M1A)**

The Applicant History Worksheets should provide information regarding the track record of the applicant, the applicant’s governing board, and if applicable, the applicant’s ESP with regard to the operation of other charter schools. The sponsor should review the entire portfolio of charter schools of the foregoing entities when evaluating performance. The academic and financial performance of the portfolio should be considered in the decision to approve or deny the application.

**Statutory Reference(s):**

s. 1002.33(6)(a)

**Evaluation Criteria:**

A sponsor should review the portfolio of schools operated by the applicant group, governing board, or ESP to determine if the academic and financial performance demonstrates the capacity to operate a high-quality charter school.

|  |
|--|
| <b>Strengths</b> ( <i>reference page numbers</i> ) |
|  |

|   |
|---|
| <b>Deficiencies/Concerns/Weaknesses:</b> ( <i>reference page numbers</i> )  |
| <p><u>Deficiencies</u></p> <p><u>Concerns/Weaknesses</u></p> <p><u>Pinecrest Academy, Inc. – Applicant Work History</u></p> <p>Pinecrest Prep Charter High School (Orlando) is shown as “closed”. The applicant did not follow instructions. For any closed school the applicant is required to attach a separate page explaining the reason for the closure with supporting documentation.</p> <p>We cannot find any information about Miami-Dade’s Pinecrest Palm Academy (MSID 4634). It’s listed as “active” but we believe it closed in 2015.</p> <p>Some schools are listed in prior years but not 2017 (as active); some skip years. For example, MSID # 0155 appears in 2015 and 2017 with information filled in, but in 2016 the information is “n/a”.</p> |

| <b>Areas in Need of Additional Information and/or Clarification</b><br>( <i>reference page numbers</i> ) | <b>Charter Applicant’s Response</b> |
|--|-------------------------------------|
| Please address concerns stated above.  |                                     |