Charter Review Committee's Final Rating
November 4, 2011

Threefold Charter School Application
Submitted By: Threefold Waldorf, Inc.

BACKGROUND

Currently, 9 charter schools are operating under contracts with the Sarasota County Public Schools. Each year charter school applicants submit proposals to the school board on or before August 1 for review. Prior to submitting an application, district office personnel hold a voluntary application workshop for all charter school applicants to familiarize them with the application process and the Model Florida Charter School Application. Following the application deadline, all charter school applicants are held to specified state standards, and all approvals or denials are based on the requirements as set forth in Florida Statute 1002.33. This statute provides school districts with the guidance and legal responsibilities for authorizing charter schools and clearly states the guiding principles and purposes of charter schools.

The charter review evaluation process consists of a review of the application utilizing the Florida Department of Education Charter School Application Evaluation Instrument by a review committee, a presentation by the Board of Directors to the School Board of Sarasota County in a work session, and a clarification/capacity interview with the same Board of Directors for the proposed charter school.

Application Review

The review of a charter school application consists of administrators and district staff with experience reviewing charter school applications. Members of the Charter Review Committee have expertise in specific areas such as bilingual and exceptional education, budget, curriculum, guidance, assessment, and accountability. Reviews were conducted utilizing the Florida Department of Education Charter School Application Evaluation Instrument and feedback was given to the applicant regarding strengths and weaknesses along with requests for additional information in areas where the committee needed clarification from the applicant.

The Florida DOE Application Evaluation Instrument is divided in three major categories including: I. Education Plan, II. Organizational Plan, and III. Business Plan. These categories are comprised of 19 separate sections on which the application can be rated as "Meets the Standard", "Partially Meets the Standard", and "Does Not Meet the Standard".

Applicants were provided with a preliminary review of their application from the Charter Review Committee and asked to submit additional information where the application was unclear or incomplete.

School Board Work Session October 18, 2011

Following feedback from the applicants regarding areas of concern, the Charter Review Committee again discussed the application and its strengths and weaknesses. The updated review feedback form was provided to school board members and charter school applicants for the School Board work session on October 18, 2011. Charter school applicants were requested to be in attendance with their founding Board of Directors to discuss and clarify areas of concern.

Clarification/Capacity Interview October 27, 2011

The next step in the review process was to conduct a clarification/capacity interview with the founding Board of Directors for the proposed charter and the Charter Review Committee. The interview is designed to determine the level of knowledge the board members have concerning the information in the application as well as the capacity of the board members to open and operate a school as described in the application. The staff's interview with the founding Board of Directors was conducted on October 27, 2011.

Summary

Based on the complete review process, there is sufficient reason to believe that Threefold Charter School has not successfully met the requirements of the charter application process outlined in FL Statute 1002.33. The statute's purpose and required application components necessary to properly administer and operate a charter school benefiting all students have not been adequately addressed. These factors are too great to reasonably recommend an acceptance of this proposal at this time.

The Charter Review Committee has significant concerns regarding the Threefold Charter School application. The standards which were not met are considered to be the most critical to operating a successful school program; educational design, curriculum, assessment and budget. Areas of major concern center on the lack of a viable reading program, the applicant's ability to appropriately staff the school with certified teachers, lack of a viable ESE and ESOL plan, a questionable loan program proposal for parents, lack of a facilities plan and an insufficient budget proposal.

The attached chart indicates the final ratings given by the Charter Review Committee for each of the nineteen application components required for charter school approval. Section 11, Education Service Providers, does not apply to this application. The overall percentages are as follows:

Percent of Standards Met by Threefold Charter

Does Not Meet: 6 out of 18 (33%)
Partially Meets: 11 out of 18 (61%)
Meets: 1 out of 18   (6%)

Sarasota County Public Schools
2011-2012 Charter School Application Process

Charter Review Committee Ratings In Response to Applicant's Revisions and Addenda
Threefold Charter School Application

Charter School Application Section	Rating of Standards		
	Initial CRC Rating *	Second CRC Rating **	Final CRC Rating
1. Mission, Guiding Principles and Purpose	Does Not Meet	Does Not Meet	Does Not Meet
2. Target Population and Student Body	Partially Meets	Partially Meets	Partially Meets
3. Educational Program Design	Partially Meets	Does Not Meet	Does Not Meet
4. Curriculum Plan	Does Not Meet	Does Not Meet	Does Not Meet
5. Student Performance, Assessment and Evaluation	Partially Meets	Partially Meets	Does Not Meet
6. Exceptional Students	Partially Meets	Partially Meets	Partially Meets
7. English Language Learners	Does Not Meet	Partially Meets	Partially Meets
8. School Climate and Discipline	Partially Meets	Partially Meets	Partially Meets
9. Governance	Partially Meets	Partially Meets	Partially Meets
10. Management	Partially Meets	Meets	Meets
11. Education Service Providers	Not Applicable	Not Applicable	Not Applicable
12. Employment	Partially Meets	Partially Meets	Partially Meets
13. Student Recruitment and Enrollment	Meets	Partially Meets	Partially Meets
14. Facilities	Partially Meets	Does Not Meet	Does Not Meet
15. Transportation	Partially Meets	Partially Meets	Partially Meets
16. Food Service	Partially Meets	Partially Meets	Partially Meets
17. Budget	Does Not Meet	Does Not Meet	Does Not Meet
18. Financial Management and Oversight	Partially Meets	Partially Meets	Partially Meets
19. Action Plan	Partially Meets	Partially Meets	Partially Meets

 * Initial ratings based on CRC's review of the 8/1/11 charter application.

** Second rating based on CRC's review of applicant's response (9/27/11) to initial feedback and concerns.

Sarasota County Public Schools
2011-2012 Charter School Application Process

Threefold Charter School

Charter Review Committee Review and Analysis of the Charter School Application and Addenda
November 4, 2011

Note: The information contained in this document is the same as that which was reported in the October 14th CRC Review and Analysis, with the exception of the final rating which is included in this report.

General Comments:

The Charter School Review Committee has significant concerns regarding the Threefold Charter School application. Areas of major concern center on the lack of a viable reading program, lack of provision for the state-required reading block, the applicant's ability to appropriately staff the school with certified teachers, lack of a viable ESE and ESOL plan, a questionable loan program proposal from parents, lack of a facilities plan and an insufficient budget proposal.

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)(a); s. 1002.33(2)(b); s. 1002.33(2)(c); s. 1002.33(6)(a)(1); s. 1002.33(7)(a)(1)

Evaluation Criteria:
A response that meets the standard will present:

- A compelling mission statement that defines the purpose and values of the school.
- A set of priorities that are meaningful, manageable and measurable, and focused on improving student outcomes.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☐	☒
Second	☐	☐	☒
Final	☐	☐	☒

Strengths
The mission statement is clearly stated and easily understood. (Page 7)
There is strong alignment of mission with programs and intended outcomes. (Page 9 – 10)
The applicant intends to implement a developmental approach dedicated to Waldorf education. The program will include an arts-integrated, multi-sensory, and nature - oriented learning environment.
Response to Intervention (RTI) Procedures are defined to assist students requiring additional academic and/or behavioral support.

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: The committee is concerned whether the potential legal issues regarding the use of the Waldorf name or program in the proposed school have been resolved. (Page 4)	Yes. The legal issues have to do with the use of "Waldorf" in the name of the school or calling the charter school a Waldorf school. We may able to use the terms "Waldorf program, Waldorf- inspired, committed to Waldorf Education, Waldorf methodology, etc. We can also use "Waldorf" in the name of our corporation.	Appropriate documentation from the Association of Waldorf Schools of North America should be submitted to resolve the concern regarding the use of the Waldorf name and/or instructional program.
The statement "We will strive to ensure that each child meets the Florida State Standards by the time he/she exits 8th grade: To my knowledge this is not allowable. (Page 4)	We will integrate the Florida State standards into the Waldorf curriculum at all grade levels	The committee would like to see how the curriculum addresses the NGSSS.
It is unclear how the Child Study Process, the Care Team, and the Student Study Team will be coordinated. Please clarify. (Page 9 – 10) The committee has concerns and questions because the RtI model proposed is outdated and does not reflect latest research. (Page 10)	The faculty chairman oversees the working together of the faculty committees. He or she is the coordinator and communicator between the groups. See ESE Clarification below	The RTI process has not been explained to the satisfaction of the committee.
It is not clear as to how the school will manage having teachers stay with the class cohort from K through grade 7. This may pose staffing challenges, such as finding teachers qualified to teach both elementary and secondary grade levels. (Page 13)	Waldorf teachers are trained to teach first through eighth grade and have been doing it effectively for over 90 years, and currently in more than 1000 schools. The credentialing process will be accomplished as the teacher advances from elementary to middle school.	The committee has continuing concerns regarding the school's ability to recruit teachers with the appropriate required certification for the goals of the school.
The reading approach seems to be in conflict with current research.	To my knowledge there is no research that shows that children in an early reading programs have any advantage in reading over other children by the time they reach the upper grades of middle school. There is however research showing that there is no	The committee believes there is a tremendous amount of research on Florida's DOE website. The applicant should access the state's Reading Resource site in order to access current reading research to guide reading instruction. This will better prepare

	substantial difference in reading by the time both groups of children reach the upper grades.	students for success on the FCAT 2.0.
	"Unfortunately, little published research exists specifically addressing the effect of preschool literacy instruction and long-term reading achievement. Across all of the reviewed international, within-language, and preschool research, the evidence converges to suggest that, by the beginning of the teenage years, there is no advantage in long-term reading performance for an earlier beginning of formal reading instruction." (See Research into Early Reading Instruction and Luke Effects in the Development of Reading	The committee feels these statements contradict much current research regarding the teaching of reading to young students. The applicant has not presented a persuasive case for this approach based on researched best practices.
The committee has questions concerning the plan for students who are academically low-achieving: Tier III – referral for ESE services. Is there no opportunity for recovery from a Tier III intervention? (Page 10)	Sebastian Suggate Department of Psychology University of Otago, NZ)	
The Waldorf approach of encouraging creativity, physical activity, and playfulness (rather than direct instruction in reading or reading readiness activities) is controversial and not broadly supported by current reading research. Additionally, such an approach would appear inconsistent with NGSSS standards for Grades K and 1 and would involve additional risks for students entering school already below level in reading readiness. (Page 11)	If Tier III interventions fail, the child will be referred for evaluation. Otherwise supports at this level will remain in place as long as they are needed. Recent research shows that these elements are important for child development in the process of learning. (See Ginsburg, Kenneth R. (January 2007) *The Importance of Play in Promoting Healthy Child Development and Maintaining Strong Parent-Child Bonds.* Clinical Report. American Academy of Pediatrics. 119:1)	The committee does not feel the response addresses the flexibility of the tiered system.

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)(e); s. 1002.33(6)(b)(2); s. 1002.33(7)(a)(1); s. 1003.03

Evaluation Criteria:
A response that meets the standard will present:

- An understanding of the students the charter school intends to serve.
- A manageable plan tied to enrollment projections that will allow the school to meet its constitutional class size obligations.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
The school has surveyed the needs of home-schooled students. (Page 13)
The school will be open to all Sarasota County students at the grade levels to be served. It is anticipated that the school will attract parents and families who desire a more arts-integrated and developmental educational experience for their children, especially students who are now home-schooled. (Page 13)

Area in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: It is unclear if the proposed scheduling plan will meet state minimum criteria for minutes of instruction.	We follow the public school calendar. The number of days in the school year is 180. The number of hours of the school day from 8:45 to 3:15 is 6.5 of which 45 minutes is lunch and recess. That leaves 5.25 hours per day of class instruction which equals 945 hours per year. Only 900 hours are required.	The applicant has not addressed the committee's concern regarding the state-required 90 minute reading black.

Reference is made to both K-7 and K-8. What is the proposed grade span? (Page 13 – 14)	In the five year proposal we will be adding grades from three up to grade seven. Grade 8 will be added in six years.	

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:

- Is clear and coherent;
- Is based on effective, research-based educational practices, 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
- Presents evidence that the proposed approach will lead to improved student performance for the school's target population.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☐	☒
Final	☐	☐	☒

Strengths
The program design aligns well with the school mission. (Page 16)
The applicant provides a significant number of anecdotal citations in support of the effectiveness of the Waldorf program. (Page 19 – 23)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application:		
The Sarasota County School Board does not have early release days as	We will follow what is required by the SCSD.	

referenced. A waiver will be required for this option. **(Page 14)** **The application does not include a detailed daily schedule at each grade level to allow for a reasonable evaluation of the school's compliance with state and local instruction time requirements and middle school course requirements. (Page 14 – 23)**	Daily schedules are the same for each grade Here is a typical daily schedule 8:45-10:45 Main Lesson 10:45-11 Recess 11-11:45 First period 11:45-12:30 Second Period 12:30-1 Lunch 1- 1:45 Third Period 1:45- 2:30 Fourth Period 2:30- 3:15 Fifth Period 3:15 Dismissal Core subjects are taught in main lesson in 3 to 5 week blocks	This schedule does not address the 90 minute state-required reading block. It does not meet the required 150 minutes per week of organized PE instruction in elementary grades. It also does not delineate scheduling differences for varying grade levels which would normally be expected in an elementary/middle school setting. There is no plan for mandatory retention for 3rd grade students that do not pass the FCAT. There also needs to be a plan to meet the good cause exemption.
The applicant's implementation of the Waldorf "main lesson" approach does not appear to be consistent with a sound educational program. The Florida statutes require 90 a minute reading block; therefore, 30 minutes in which to teach writing, science, math and social studies is inadequate. How will the school ensure provision of appropriate instruction in the other core subject areas? (Page 15)	**In the Waldorf approach reading and core subjects are blended and integrated together. Accordingly, the two hour main lesson period that deals with the core subjects includes reading, storytelling, singing, writing, poetry, drawing, and rhythmical movement. All of this is integrated into the lessons and the result is learning to read and write among other things.**	
Who is responsible for providing and monitoring instruction during the "practice periods" identified in the application? (Page 15)	**The class teacher instructs in the "practice" periods. These periods include work in math, spelling, reading, form drawing, painting, and play practice, and physical education.**	
Who is responsible for providing instruction in the "specialty classes" and what specialty classes will be offered at each grade level? (Page 15)	**Part time specialty teachers. The same subjects (foreign languages, handwork, eurythmy, spacial dynamics) are offered in all grades except woodwork which starts in 5th grade and beginning violin which is offered only in third grade.**	

The application does not define a clear research base for the effectiveness of the Waldorf program. While the applicant references the research of Robert Marzano as related to "certain practices" (looping, summarization, and interdisciplinary teaching) associated with the Waldorf method, that does not constitute an endorsement of the Waldorf program as a whole. (Page 15 – 16)	There is additional research available. A comprehensive recent study of Waldorf graduates is published on the WhyWaldorfWorks website entitled "Survey of Waldorf Graduates – Phase 2" that shows the results of Waldorf Education as reflected by the students.	The committee feels the site referenced does not represent a clear research base.
Please clarify- Is the Threefold program a replication of the Waldorf education program? Please explain the reference to "Waldorf-inspired school." (Page 17)	Charter schools are not allowed to say they are Waldorf schools but only Waldorf-inspired schools. (See first clarification above.) In reference to replication of a Waldorf Program, a snapshot of how a Waldorf Program generally works is provided below. Waldorf Schools came about in 1919 through the inspiration and under the guidance of Rudolf Steiner, philosopher, educator, humanitarian, and scientist. The philosophy, guidelines, practices, principles, and methodology developed by Rudolf Steiner have been successfully implemented in over 1000 independent schools worldwide. There is no central authority in the Waldorf school movement. Each school is independent. There are however three associations of independent schools in the United States for the purpose of support and professional development through conferences, workshops, and publications and a research institute for Waldorf education. These programs are available to anyone. Waldorf schools are usually founded by a group of parents and/or Waldorf trained teachers who want a school in their area built	

around the Waldorf principles. They create their own school usually under the guidance of experienced teachers from established Waldorf schools. These groups of parents and teachers recognize the value of a system that strives to educate the <u>whole</u> child which is done by integrating the "emotional/feeling/artistic" element and the "will/active/hands-on practical" with the "intellectual/academic" element. The ultimate goal of Waldorf education is a balanced human being.

There are several teacher training centers in the United States where teachers learn the philosophy, practices, principles, methodology of Waldorf education. The instruction includes extensive training in the arts. There is a Waldorf curriculum and rubrics that each teacher follows but each is free to choose materials best suited to his/her particular group of children. It is the entire faculty's responsibility to insure that each teacher meets his/her responsibilities through a review process and mentoring. The class teacher remains with the class ideally for grades 1-8 thereby developing a deep and intimate understanding of each child/s strengths and challenges allowing the teacher to address the child's needs more efficiently. Specialty teachers offer their expertise in such areas as foreign languages, handwork, etc. Waldorf is a developmental approach to education. Kindergarten is the last phase of early childhood and is addressed differently than the elementary grades. The kindergarten

The responsibility of the "class teacher" (working with the same group of students for eight years) for all academic instruction during the "main lesson" raises significant issues relating to 1) the practicality and research base for looping for such an extended period of time, and 2) teacher certification and NCLB "highly qualified" status for the subject areas to be taught. (Page 18)

is seen as a place where children can acquire essential foundations for later life. Its curriculum includes free creative play, movement, language, sensory experience, rhythmic-musical-artistic activities and a playful exploration of nature.(See pages 23-24 of the charter application) These elements provide a foundation for elementary school learning in such areas as mathematical-scientific thinking, literacy and linguistic capacity, artistic ability and media competency. In addition and perhaps ultimately more significant in the Waldorf approach is the development of qualities such as authenticity, independence, ethical values, social awareness, resilience, and health; these are the larger goals and "desired outcomes" of Waldorf Education and form the basis for a fulfilling life. These qualities however are not quantifiable. At the foundation of Waldorf philosophy is a respect for the unique individuality of each child who comes with his/her gifts to give the world. The pedagogy is designed to enable each one to find and unfold and explore those gifts.

It is not required for teachers to go through all eight years. Some may just do elementary and some do middle school. However, Waldorf teachers are trained to teach first through eighth grade and have been doing it effectively for over 90 years currently in more than 1000 schools worldwide. Teachers of elementary grades will be working toward meeting all certification requirements for middle school before entering middle school.

The committee acknowledges the Waldorf philosophy of teaching, however, there continues to be great concern regarding the highly qualified and dual certifications that would be required to implement this instructional approach and meet the NGSSS.

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 consistent with the school's mission, educational philosophy and instructional approach;
- Will enable students to attain Sunshine State Standards and receive a year's worth of learning for each year enrolled; and
- Will be appropriate for all students at all levels.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☐	☒
Second	☐	☐	☒
Final	☐	☐	☒

Strengths
Reading is a primary focus in the school.   The applicant provides a detailed description (including examples of student work) of the curriculum and course offerings in each subject at all grade levels. (Page 23 – 56)   The reading program for on-level students is described. (Page 61)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: Within the 2 hr "main lesson" will 90 minutes be devoted to the reading block as required by the state for elementary schools? How will other core subjects listed be accommodated? (Page 17, 41)	This first part of the question is answered above in the question about reading. Waldorf uses the block method of teaching where one	The applicant has not addressed the committee's concern regarding the state-required 90 minute reading black.

	subject is taught in the main lesson for 3 to 5 weeks so the children are able to get a thorough grasp of the subject. This block method has been shown to be effective and have been adopted by many school districts in other states.	
Please describe how children will be challenged if they are performing above grade level reading instruction as provided in the regular curriculum. Describe strategies and curriculum for students reading below grade level. (Page 23)	Students will be given appropriate reading material which challenges their abilities. They are also challenged in the writing and illustrating of their main lesson books which is integral to the reading process. Remedial work may be indicated for those who are below grade level.	The committee feels the applicant has not replied with specific details regarding reading levels, materials or strategies to be used regarding reading.
The alignment of the school's curriculum with NGSSS, at each grade level, is not clear, making it difficult to evaluate the school's ability to ensure student mastery of NGSSS. The applicant should provide a description of that alignment. (Page 23 – 56)	Threefold has access to other Waldorf based charter school curriculum standards and assessment rubrics for all grades. The teachers of the school will align them to the NGSSS **without compromising the main goals and intentions of Waldorf education.** A copy of that alignment will be provided to the school district. As the teachers progress from third to eighth grades, the alignment will become more complete.	The committee is concerned that this item is lacking in application. There is no way to make sure there is alignment with the state standards.
The research base for the school's proposed reading program is unclear and the application does not describe reading strategies and materials to be used for students reading at grade level, above grade level and below grade level. (Page 57)	The basis of the school's reading program comes from the effectiveness of using this program for 90 years currently in over 1000 schools worldwide. There is no current research that shows that early reading programs show any better results in children who graduate from public schools than Waldorf schools. There is research that shows that by eighth grade Waldorf students meet or surpass the public school peers in	The applicant has not addressed the committee's concern regarding the state-required 90 minute reading black.

	reading and math. (See "LEARNING FROM RUDOLF STEINER:THE RELEVANCE OF WALDORF EDUCATION FOR URBAN PUBLIC SCHOOL REFORM") Ida Oberman, PhD September 2007 As far as reading materials and strategies, much is left to the discretion of the individual teacher who knows and works with his class. In the Waldorf approach, many elements are brought to bear in the development of a child's ability to read. Storytelling, dramatazation, poetry, word games, movement exercises, and writing all support the instruction of reading and are integrated into the process. All of these processes can offer challenges to students reading above grade level. Additionally, children may t choose reading material that is at their level. For those who read below level remedial help is provided by teachers as indicated through the assessment procedures.	The committee continues to believe that the reading materials and strategies to be used that are research based have not been identified. The reading curriculum must be consistent with effective teaching strategies and be grounded in scientifically-based reading research.
The reading curriculum must be consistent with effective teaching strategies and be grounded in scientifically-based reading research. How does research support the school's foundation of reading instruction? (Page 57, 62) See www.justreadflorida.com/docs/readingprograms.pdf	The research of graduates of other Waldorf Schools supports this approach. (see Survey of Waldorf Graduates – Phase II. @ www.whywaldorfworks.org or www.waldorflibrary.org	The committee has ongoing concern regarding the lack of integration of technology into the curricular program.
The application indicates that use of technology will "occur in a specific and gradual timeframe and will not be used as a learning tool until middle school." That approach may be consistent with Waldorf practices, but "flies in the face" of current research regarding the importance of infusing technology into student learning at all grade levels. (Page 67 – 68)	In my own experience I have found that a good part of the current research you refer to is funded by the computer industry. However, more and more current research is disputing the use of electronic media for young children. An article by Donna M.	

Chirico entitled " Building on Shifting Sand The Impact of Computer Use on Neural & Cognitive Development" is a good illustration of current research. Here is a quote from that article. "The consequence in education is that economic and political concerns take precedence over a pedagogy that supports the basic progress of children's development. An effort is needed to understand the processes involved in this fundamental growth. When this is done, it becomes clear that questions of appropriate usage and the timing of exposure to technology are critical to integrating computers into young lives. Computers are not demonic in nature. They are certainly useful tools and should be suitably and thoughtfully integrated within the educational system. However, exposing children to even a felicitous experience at the wrong time or in the wrong way may alter the manner in which they sense and perceive the world."

The identified goals for the school in all subject areas are laudable but not measurable. Additionally the identified goals are applicable to what students will have mastered by graduation from eighth grade and do not address measurable academic and non-academic goals for other grade levels. (Page 68 – 70)

Threefold has access to other Waldorf based charter school curriculum standards and assessment rubrics for all grades. The teachers of the school will align them to the NGSSS and provide a copy of that alignment to the school district. (See sample in Appendix A)

Please specify the materials and set of strategies will be used for reading instruction?

The individual teacher who knows and understands his children's needs develops strategies and materials.
 Waldorf teachers use a multi-sensory

The committee does not believe the materials and strategies that will be used for reading instruction have been identified. The comprehensive K-12 Reading Plan

	approach to instruction that utilizes verbal, visual, tactile, and kinesthetic methods of delivery. Teachers present a great deal of information orally through storytelling. Visual aids such as blackboard drawings are used to illustrate concepts in all subject areas. Movement is also used to reinforce learning in all subject areas. For example, movement in math might involve walking on a balance beam or jumping rope while reciting multiplication tables. Music is used also to reinforce the learning of math and other subjects. Through a multi-sensory, whole-body approach to learning, the Waldorf approach builds capacities in areas such as: bilateral coordination, fine and visual motor integration, visual perception, body awareness, balance, and gross motor coordination.	demands that schools identify their core and supplemental reading texts.
The applicant indicates "Three Fold Charter School curriculum meets and exceeds all state curriculum content standards by the completion of Grade 8". However, a curriculum must meet state standards for all grade levels. The applicant states that the school will have some differences in the scope and sequence of instruction regarding state standards. How will the school ensure that students will receive instruction in all of the benchmarks prior to the state tests at each respective grade level? (Page 73) General comment: The instructional strategies and instructional materials to be used at the school are not addressed.	As noted above the alignment of Threefold's curriculum with State standards will be developed as the teachers progress through the grades. All the teachers will be involved in this process. This seems to be a rewording of the above question Waldorf teachers are trained to develop instructional strategies based on their own creative abilities and what they perceive as the needs of the children. There are no set strategies for any one teacher. Instead, each	The committee believes that there is still no evidence of a plan to meet NGSSS benchmarks at each grade level before FCAT 2.0.

teacher has a broad range of possibilities to choose from. Instruction is presented verbally by the teachers through stories and illustrations and biographies and by drawing and writing on the blackboard. Instructional materials are usually developed by each teacher.

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:

- Measurable educational goals and objectives that set high standards for student performance.
- Promotion and graduation standards that are based on high expectations and provide clear criteria for promotion from one level to the next, and for graduation.
- Evidence that a range of valid and reliable assessments will be used to measure student performance.
- Assessment activities that are sufficiently frequent and a detailed plan to determine whether students are making adequate progress.
- Evidence that data will inform decisions about adjustments to the educational program.
- Plans for sharing student performance information that will keep students and parents well informed of academic progress.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☒	☐
Final	☐	☐	☒

Strengths
The applicant identifies previous year FCAT data and FAIR assessments to establish student baseline proficiency. (Page 75)

The applicant recognizes the school's legal obligation to have students participate in all required state assessments. (Page 78)	
The applicant will follow the district progression policy. (Page 74)	

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: What are the school's FCAT proficiency goals, at each grade level and for each year of the charter? (Page 70 – 81)	The School will meet and/or exceed the overall performance of the district as evidenced by the amount of students meeting high standards in the reading, mathematics, writing and science sections of the FCAT **Lowest Performing in Reading and Math** Goal- All lowest performing students demonstrate learning gains in Reading and Mathematics Objectives: At least a 10% annual increase in the amount of students in the lowest performing group demonstrating learning gains on the reading/math portion of the FCAT. Once we reach 80% in these indicators, the School will meet these objectives by either maintaining this level or performance or making further improvement on this level of performance.	Given that grade levels are not specified, it will be assumed that the goals apply to each individual grade and content area measured by the FCAT.
Please provide a sample rubric for measuring student growth or describe the elements it will include. (Page 71) What are the state API growth targets? Did the applicant intend to say school and not state? (Page 71)	A sample rubric is provided in Appendix A (The Appendix is a checklist of math goals as documented by teacher observation only) School was meant, not state.	The Appendix is a checklist of math goals as documented by teacher observation only and does not appear to be a "grade level rubric to measure student growth." OK, so what are the school's API growth

The student achievement goals are laudable but not measurable or tied to achievement of NGSSS. The majority of the goals are related to "process" rather than specific and measurable students' outcomes. (Page 71 – 73) General comment: There appears to be some confusion with the use of the term "measurement tools" in relation to outcomes and targets. Threefold Charter School strongly encourages parents and guardians to have their children participate in state testing. However, testing of all students is required. (Page 74) What is the retention plan for level 1-3rd grade students that score level 1 on FCAT? What is the plan for course recovery in middle school? What is the plan for students that score level 1 or 2 on FCAT reading in grades 6 and beyond? Please describe specific progress monitoring assessments to be used. FCAT is not a progress-monitoring assessment. How often will they be administered? (Page 74, 75) The applicant identifies a number of informal, classroom based, assessment procedures, including criteria based reports, parent conferences, portfolios, demonstrations and letter grades, but does not specify: 1) What valid and reliable assessments will be utilized? 2) How	The real difference between Waldorf and other types of schools is that Waldorf looks at the qualitative aspects of human development as well as quantitative outcomes. We use the term much more broadly to include qualitative evaluation and not as defined by Public Schools. It could be eliminated to avoid confusion Yes, we will comply Students who score at level 1 in 3rd grade will take a summer reading program offered by the School District or similar reading camp or private tutoring To be determined by the teachers before we start the middle school grades. Remedial work with the class teacher and/or private tutoring is always a function of the assessment process. This process will also be clarified before we enter the middle school grades The FAIR assessment will be used as required Threefold also has access to other Waldorf based charter school assessment rubrics for all grades. The teachers will use these to monitor the progress of each child.	targets? Granted, the Waldorf approach has a heavy emphasis on other, non-academic, student attributes. However, state statute still requires that address students' achievement of the NGSS standards. The terminology in the field of measurement and evaluation is well established and its usage is not limited to quantitative methods nor is the vocabulary defined by or used solely by public schools. Both the initial application and this subsequent response indicates that the applicant is not familiar with state statute requirements for promotion to grade 4, reading remediation, and/or middle school course recovery. Private tutoring is not an acceptable good cause exemption. The progress monitoring with FAIR and other tools is appropriate.

| frequently those assessments will be administered? 3) How assessment data will be provided to teachers and used to guide instruction? (Page 76 – 78) | FAIR assessment will be used as required by the school district. Teachers will receive copies of the assessments to use in the process of helping to guide their instruction. Also assessment rubrics developed by other Waldorf based charter schools will be adapted for our use. (See Appendix A) | The response does not adequately clarify the CRC's question. A wide variety of assessment tools are proposed but a well defined and balanced assessment system is not evident. |

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:

- Demonstrated understanding of state and federal requirements regarding the education of exceptional students.
- Demonstrated a commitment to serving the full range of needs of exceptional students.
- Sound plans for educating exceptional students that reflect the full range of programs and services required to provide all students with a high quality education.
- Demonstrated capacity to meet the school's obligations under state and federal law regarding the education of exceptional students.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
The applicant indicates and understanding of the school's legal obligation to admit and enroll students with disabilities (SWD) in a non-discriminatory manner. (Page 82)

The applicant recognizes the need for RTI interventions and documentation prior to any consideration of evaluation for ESE services. (Page 83) |

The applicant recognizes the need to provide appropriate "related services" (OT, PT, Speech, etc.) as part the school's ESE program and intends to contract with qualified third party vendors for those services. (Page 86)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: Although inclusive environments are what educators strive for with students with disabilities (SWD), they do have IEPs that indicate the need for specially designed instruction (SDI) in order to develop the necessary skills to be successful in the least restrictive environment (LRE). How is SDI going to be delivered to meet the specific needs of those students? If they did not need something different, they would not have an identification educational label. The ESE service delivery model speaks to consult. Based on the IEP, an ESE teacher needs to be able to provide SDI. If not, there is no difference in the implementation of the instruction based on what the student needs. Consult is for students who have received SDI and are doing well academically and can function in the general education classroom with limited support. (Page 84, 2nd Paragraph)	**Exceptional Students - Clarification** The Threefold Charter School will provide exceptional student educational services to students at various levels of need in accordance with the Sarasota County School district RTI (Response to Intervention) process that includes a 3 Tiered model of providing instructional services. The 3-Tiered model offers differing levels of intensity of interventions based upon the response to intervention. For students without IEPs in place, the classroom teacher may initially identify concerns. Concerns may be identified in many ways including; data review, teacher observations and parent input. The class teacher is primarily responsible for Tier 1 intervention. Tier 1 interventions will focus on providing students with curricular enhancements related to the core curriculum. Assistance in designing and implementing interventions at this level comes from the school's ESE specialist, the Child Study Team (CST) and the Care Team (CT). Child Study occurs during the weekly Faculty Meeting. The class teacher initiates the process by giving colleagues a complete and holistic picture of the child. After the child is described physically, socially, and academically, the teachers	

have an opportunity to ask additional questions. Discussions of a particular child may take place during several meetings. Next, the teachers are asked to observe the child for one week. Then, the parents of the student are often invited to describe their child and to offer insight or suggestions. Teachers and parents brainstorm together in order to find solutions to help the student become more successful.

The Care Team functions as a school-wide support team and includes the following personnel: administrator, ESE specialist, ESE Liaison, school psychologist, school social worker, speech language pathologist, and other support staff as needed and/or appropriate. The function of the Care Team is to discuss existing data and information, identify student needs, problem solve and to make recommendations for future activities regarding a student's academic performance, attendance and overall school-wide adjustment.

If concerns are still apparent after Tier 1 intervention has been implemented with fidelity and with sufficient time and intensity, Tier II intervention is initiated with the assistance of the school's ESE specialist, the CST, the CT or other support staff as appropriate. At Tier 2 supplemental interventions will be provided to students who need more support in addition to the core curriculum. These interventions will be provided in small groups or one-to-one instruction. When Tier II interventions are determined not to be sufficient after implementation with fidelity and sufficient time

and intensity, Tier III interventions are designed and implemented with the assistance of the school's ESE specialist, the CST, the CT, and other support staff as appropriate. At Tier 3 students will be provided with individualized intervention in a more comprehensive and intensive fashion than at the previous levels.

Parents are included in the intervention process as soon as their child is experiencing academic or behavioral difficulties. All assessment data is shared with parents at parent/teacher conferences.

Referral procedures

Prior to referring students suspected of having a disability, school personnel must determine and document that general educational procedures have been implemented but have been unsuccessful in addressing the areas of concern or that the parents of the child receiving general education interventions has requested an evaluation to determine the child's eligibility for specially designed instruction and related services. Referrals for all school-age children suspected of having disabilities that require special education and related services can be made by parents, professional school staff or by others with knowledge of the child. Referrals should be made in writing directly to the ESE specialist at the school. Once the referral has been received by the ESE specialist, the Care Team will convene and review all existing evaluation data and determine the need for additional evaluations. If additional evaluations are needed,

the ESE Specialist must obtain parental consent.

Specially Designed Instruction (SDI)

Students with identified disabilities will be provided with Specially Designed Instruction (SDI) as outlined in their IEP to meet the unique needs of the student that results from the student's disability. Specially designed instruction means adapting, as appropriate, the content, methodology and/or delivery of instruction. Specially designed instruction may employ accommodations and/or modifications. Examples of SDI include; providing information in various formats to address different learning styles such as: visual, auditory, tactile, kinesthetic, grouping children in small groups or pairs, allowing more time for task completion, establishing consistent classroom routines, providing alternate assessments such as oral tests, rubrics, portfolios, and individual/group projects.

The Threefold Charter School will hire a certified ESE specialist who will implement and oversee ESE services for children with special needs. Currently in our initial budget this is listed as a half-time position, however, this could increase to full-time based upon need. The ESE specialist will be responsible for providing direct small group and individual instructional services to students, maintaining all required paperwork in special files including IEPs, reports, assessments/evaluations, consulting/communicating with class teachers, the administrator, support staff, and parents, and providing professional development as needed to

	teachers and support staff. However, the Threefold Charter School also intends to contract with an ESE Liaison from the county to provide general ESE administrative support services.	
	ESE staffing	
What are the targeted goals and growth percentage in (E.)? (Page 85)	Besides the part or full-time ESE specialist who will be hired, the Threefold Charter School will contract on a part-time basis for the following related services: speech/language, occupational therapy, physical therapy, psychologist, social worker, or mental health professional.	
The committee has concerns as to whether a <u>consultant</u> can manage all of the responsibilities detailed in the school plan. (Page 85 – 86)	**The goals are to have the students progress at appropriate levels. This will be demonstrated with at least a 10% annual increase demonstrating learning gains on the reading/math test.**	**The committee is concerned that the applicant does not specify levels of service or staffing for ESE beyond the part time specialist mentioned in the proposal.**
The applicant does not demonstrate a clear and thorough understanding of the requirements to meet the needs of SWD. Need further elaboration and specificity.	**Answered above**	
The application is unclear and contradictory with regard to the levels of ESE services to be provided. On Pg 82 the applicant appears to offer a "one size fits all" continuum of placements where all SWD will be serviced in a general education classroom, with unspecified "alternative settings a short basis" as the only alternative. In the same paragraph the applicant states that the school is obligated to provide a full continuum of services. Please clarify. (Page 124, Budget Appendix B)	**Answered above**

Answered above | |
| **The applicants plan for ESE staffing is unclear with regard to the number of ESE staff to be employed based on projected enrollment and whether those staff will be full time direct employees or part time contracted services. It is also unclear whether the same staff will provide direct instruction and compliance services. Please clarify. (Page 85 – 86)** | **Answered above** | |

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(16)(a)(3)

Evaluation Criteria:
A response that meets the standard will present:

- Demonstrated understanding of state and federal requirements regarding the education of English language learner students.
- Demonstrated a commitment to serving the full range of needs of English language learner students.
- Sound plans 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.
- Demonstrated capacity to meet the school's obligations under state and federal law regarding the education of English language learner students.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☐	☒
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
The applicant appears to recognize the school's obligation to provide appropriate services to ELL students. (Page 87)

Area in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: There does not appear to be funding for E.L.L. services in the budget as referenced on page 88. (Page 124, 125, Budget) Evidence of a comprehensive ELL plan is not provided.	Class teachers will be credentialed for ELL services and provide the services as necessary ELL plans will be developed by the teachers	A comprehensive ELL plan has not been provided to the satisfaction of the committee.

This section should be reviewed for compliance with Federal, state, and district requirements. (Page 87 – 89)	who provide the services.	

8. School Climate 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); s. 1002.33(9)(n)

Evaluation Criteria:
A response that meets the standard will present:

- A school calendar and schedule that meets the minimum statutory requirements.
- An approach to student discipline that creates and sustains a safe and orderly learning environment.
- Legally sound policies for student discipline, suspension, dismissal and recommendation for expulsion.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
The applicant describes the school's essential components and characteristics of the learning environment that contribute to a safe and orderly school climate. (Page 89)
The applicant will implement the district's Code of Student Conduct to ensure compliance with legal requirements for student discipline, suspension and expulsion.

Area in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: Please provide a school calendar for review. (Page 89 – 90)	We will follow the public school calendar. It is online at the school district's website.	

| Please describe and explain the PBS plan. | A Positive Behavioral Plan is built into the Waldorf approach. Main lesson books are reviewed and remarked upon. Drawings and paintings are hung up in the room. Children show their work at assemblies before other grades and parents. The orchestra performs for the parents and students. Plays are performed for students and parents. Children are complemented on their work and an atmosphere of encouragement by teachers and other children is developed in the classroom. Children develop a love and respect for their class teacher and sometimes a word of praise or encouragement from the teacher can work wonders for a child. | |
| If the school intends to dismiss students for any reason, dismissal procedures should to be provided; including possible reasons for dismissal, due process procedures prior to dismissal and reasonable parent (and district) notification procedures. (Page 89 – 90) | A dismissal policy will be implemented by the school and is subject to modification by the Governing Council. See Appendix B | The plan is not clear regarding expulsion vs. student dismissal from the school. The committee has concerns regarding the applicant's understanding of these two processes. |

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.

9. 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(16)(5)(b)

Evaluation Criteria:
A response that meets the standard will present:

- Documentation of proper legal structure of the governing board.
- Adequate policies and procedures for board operation.

- Evidence that the proposed governing board will contribute to the wide range of knowledge and skill needed to oversee a charter school.
- A clear, sensible delineation of roles and responsibilities in relation to governance and school management.
- A plan for the meaningful involvement of parents and the community in the governance of the school.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
There is a varied group of parents, teachers and administrations governing the school. (Page 96)
The applicant, Threefold Waldorf, Inc. (TWI) has not yet applied for 501 c 3 status, but intends to do so upon approval of the charter application. (Page 92)
The roles and responsibility of the governing board are clearly defined and appear to be consistent with statutory requirements. (Page 94)
The nominating committee responsible for board membership will consider skills and knowledge needed by incoming board members. (Page 95)
Identified initial board members appear to be individually well qualified. (Page 96 – 97)
Dispute resolution procedures are detailed and well defined. (Page 98 – 99)
Bylaws for TWI are included in the application. (Appendix A)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: Please clarify the role of the Charter Governing Council. Will it be limited to setting policy and not the actual operation of the school? (Page 92) The organizational flow chart does not include the Waldorf national organization.	The Governing Council will be limited to setting policy and will not be involved in any of the operations of the school There is no national organization for Waldorf- method charter schools	

Has the applicant resolved any potential legal issues regarding the use of the Waldorf name? (Page 92)	Yes, please see the response to the first question above.	
The application indicates that "the school will have "access to network of services available through Threefold Waldorf, Inc." What are those services? (Page 92)	Threefold Waldorf, Inc. is forming an alliance with Rudolf Steiner college to provide for teacher training, possibly here in Sarasota. It will also provide access to other Waldorf based Charter schools' personnel and policies. Finally, it will also make loan funds available to the school and engage in other fund raising efforts for the school.	The applicant has not made clear the availability of funds for staff development.
The governing board (Charter Council) may consist of as few as five or as many as nine members including parent, teachers, and community members. Per the bylaws, the governing board could have as few as one community member. Parent and teachers holding voting memberships on the board has the potential for conflicts of interest on issues related to parents, students and staff. (Appendix A)	There is a defined conflict of interest policy in the bylaws which will become further elaborated as needed.	There remains confusion regarding the composition of the board and the potential for conflicts of interest.

10. Management
The Management 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:

- A management structure that includes clear delineation of the roles and responsibilities for administering the day-to-day activities of the school.
- A sound plan for the recruitment, selection and evaluation of the school leader.
- A viable and adequate staffing plan.
- A sound plan for recruiting and retaining qualified and capable staff.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☒	☐	☐
Final	☒	☐	☐

Strengths
Job descriptions for the school administrator and teachers are included in the application. (Page 99 – 100) The responsibility of the school administrator for day-to-day operation of the school is clearly identified. (Page 99 – 100)

Areas in Need of Additional Information and/or Clarifications	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: Staffing may be challenging, and meeting the requirements of highly qualified teachers may not be realistic due to the structure and design of the educational program which requires teachers to remain with their students from Kindergarten through 7/8 grade.	Most of the teachers will come through teacher training centers and other Waldorf Schools. We already have a dozen inquiries.	Although the committee revised the rating in this area to <u>Meets the Standard</u>, there is a continuing concern regarding the applicant's ability to recruit teachers with the required certifications for the school.
A plan is not included for recruitment and retention of teachers.	We will advertise in the Waldorf jobs market We retain our teachers by creating a positive school environment and community, funding for continuing education, and opportunities for professional development.	
Desired qualifications for the school administrator are identified but the process for recruiting, selecting and evaluating the administrator is not defined. (Page 101) Procedures and criteria for evaluation of individual staff members are not clearly identified. (Page 102)	A committee of the Council will interview and evaluate potential administrators and staff members (not teachers) based on the criteria listed in the charter and make a recommendation to the Council. The Council will make the final decision.	
The staffing plan in Appendix B identifies only one part-time special education consultant for each year of the charter. This level of staffing is inadequate to meet the needs of the school's ESE students. (Appendix B)	The staffing level will change as necessary depending on the numbers of ESE students we actually have each year.	

11. Education Service Providers
The term **"education service provider" (ESP)** refers to any number of organizations that contract with the governing board of a school to provide comprehensive services. The three major types of ESPs that serve charter schools are education management organizations, comprehensive school design providers, and virtual school management organizations. The Education Service Provider section should describe, if applicable, the contractual arrangement between the school's governing board and such a provider.

Statutory Reference(s):
s. 1002.33(7)(a)(9)

Evaluation Criteria:
A response that meets the standard will present:

- A persuasive explanation of the reasons for contracting with an education service provider.
- A persuasive explanation that the proposed relationship with the ESP will further the school's mission and program.
- A clear description of the services to be provided by the ESP.
- A clear delineation of the roles and responsibilities between the school's governing board and the ESP.
- A clearly defined performance-based relationship between the school's governing board and the ESP.

CRC Rating	Not Applicable	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☒	☐	☐	☐
Second	☒	☐	☐	☐
Final	☒	☐	☐	☐

Strengths

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments

12. Employment
The 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 compensation plan that will attract and retain quality staff.
- Policies and procedures that hold staff to high professional standards.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
A proposed salary and benefit schedule is included in the application. (Appendix F)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: The average salary for teachers seems disparate from teacher requirements on pg 102. Please clarify the professional development designated by the administration pertaining to state statutes and assessments affecting student achievement. The administrator salary identified in the application is very low ($40,000). How will the school attract a well qualified school leader for this salary? (Page 103, Appendix F)	Our teachers are committed to Waldorf Education and these salaries are actually commensurate with most other Waldorf and Waldorf method charter schools. That is one of the primary jobs of the administrator to keep up in his / her professional development with the state requirements. Because we are a Waldorf methods school, many people are attracted to it. We already have two interested parties. We also plan to accelerate that salary over the years as the school grows and has more funds available.	The CRC continues to have concerns about Threefold Charter School attaining and retaining highly qualified/dually certified teachers.

The school's personnel policies are not included in the application, nor does the application indicate when, and by whom, those policies will be developed. (Page 102 – 103) The application indicates that staff who do not teach core curriculum classes "are not bound by credential requirements." This assumption appears to be incorrect. The applicant must identify all "specialty classes" to be offered by the school and the certification requirements for those classes. (Page 103)	Policies will be developed by the Council and faculty before the beginning of the school year. All specialty teachers will be credentialed as required. Foreign language requirements are listed on the DOE website. We are currently researching certification requirements for handwork, woodwork, eurythmy and spacial dynamics which are types of body movement.	A clear plan and timeline for personnel policies are lacking in the application.

13. 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.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☒	☐	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
The advertising plan is varied. (Page 103)

The applicant conducted informational sessions in the community to share information regarding the proposed school. (Page 104)

Marketing and recruitment strategies for the proposed school are identified. (Page 104)

Admission and enrollment procedures are well defined and appear to be consistent with statutory requirements including specified enrollment periods, conducting of a lottery if applicants exceed capacity, and allowable enrollment preferences. (Page 105)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: How were families identified to participate in the survey referenced on Pg. 103? Was this a random selection process designed to reflect the total community or was it targeted to a selected population of families? (Page 103 – 104)	The families indicated all volunteered to participate on their own. It was mostly done through advertising by electronic means such as Facebook and other social media also with flyers, radio interview, and word of mouth.	The committee has moved the rating in this area from Meets the Standard to Partially Meets the Standard because the proposed loan program is unclear and problematic and will most likely hinder student and family recruitment for a public school. The loan program appears to be in conflict with open enrollment requirements.
The loan described in the application has questionable merit and raises legal issues. (Page 110)	The loans are not to the school but to the non-profit corporation and were mentioned solely to show where the funding for the startup would originate.	The committee has serious concerns regarding the loan component of the application in a public school based on a free public education. The loan programs could be interpreted as a tuition payment.
Requests for donations may be in conflict with laws and court precedent related to FAPE (pg 105)	Donations are not to the school but to the non-profit corporation. All non profits can have fund raisers.	

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.

14. 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:
A response that meets the standard will present:

- **A realistic plan for securing a facility that is appropriate and adequate for the school's program and targeted population.**
- **Evidence that the school has access to the necessary resources to fund the facilities plan.**

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☐	☒
Final	☐	☐	☒

Strengths
The applicant identifies the estimated square footage requirements, cost per square foot, and total facilities costs for the proposed school. (Page 108)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: The facilities plan cost analysis does not include carry-forward costs of expanding a facility and does not reflect current real estate market values in central Sarasota County. (Page 108)	Our research with real estate marketers and our own experience with the Sarasota Waldorf School indicate that we are able to find commercial real estate within our budget. Also there are two lines in the budget for expansion. The first is entitled School classroom expansion and the second is the last line of the budget entitled Building Fund/Contingencies.	The facilities plan is inadequate and the budget does not reflect funding for long-term financial stability.
This section should be carefully reviewed to ensure that the above referenced facilities cost estimates is accurate. (Page 108)	It will be carefully reviewed once a facility is found.	

15. Transportation
The Transportation 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 transportation plan that will serve all eligible students.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
The applicant intends to contract with School Board for transportation services. (Page 109)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: **The transportation budget appears to be underfunded based on a lack of information on the targeted demographic area.** **There is no information provided regarding how the school will adhere to transportation rules and regulations as set forth by state regulations.**	**We assume most kindergarten children will not use the pubic school bus system** **We will follow whatever state rules and regulations that are required. We are using the Public school system but not offering it to all parents if it becomes too expensive. We will not be offering carpooling.**	**The committee has concern regarding this statement and does not feel the applicant has a clear understanding of the requirements for student transportation.**

| If a geographic area were defined, transportation might be more adequately planned. It is difficult to determine with the limited information presented. (Page 109) | We have parents from all over Sarasota and Bradenton who want to send their children to the school. Our parents are not related to any geographic area but to the Waldorf idea behind the education. | |

16. 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.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
The applicant intends to contract with School Board for food services.

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: This section, and the budget section, should be reviewed to ensure compliance with federal, state and local requirements and to ensure that	We will be using the Public school food services and the children will pay for their	The committee is concerned about the highlighted comment. Regardless if the applicant questions whether anyone will use the school lunch program, the school is

projected food services costs are realistic. (Page 109, Appendix C)	own meals unless they qualify for the free lunch program. That item is not included in the budget because we do not know if anyone will use the service.	responsible to supply basic equipment to run the program. Those costs are not reflected in the budget.

17. 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 which are consistent with all parts of the application, including the school's mission, educational program, staffing plan and facility.
- A realistic assessment of the projected sources of revenue and expenses that ensure the financial viability of the school.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☐	☒
Second	☐	☐	☒
Final	☐	☐	☒

Strengths

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: The applicant's intent to seek $1,000 loan commitments from parents is not permissible. Any perceived requirement that a loan to the school is a prerequisite for enrollment is a clear violation of statutory open enrollment requirements. In the absence of any letters of commitment (regardless of	It is the corporate non-profit organization that is creating the loan fund for the school. As such it has no relation to the enrollment of any child in the school. It is clear to parents that a loan is not a requirement and many potential parents have already elected not to	The budget, as presented by the applicant, would place the school in a financial emergency status and the funds allocated for the facility, water and electricity are unrealistic. Additionally, the committee has serious reservations, both legally sound

student enrollment status) of loans to the school, these funds cannot be confirmed. (Page 109)	participate. Our student selection process is by lottery if too many parents apply.	financial practice, regarding the $1,000 parent loan program.
There is no budget presented for the audit. (Page 126)	Incorporated in the bookkeeping budget und the line entitled Bookkeeper/Auditor. Day to day operations will be audited by the treasurer of the Council on a weekly basis.	
One part-time bookkeeper will not be adequate for the financial management and reporting requirements of the school. (Appendix E [2])	Our experience indicates that a part time bookkeeper cooperating with the treasurer can handle the necessary work in the first years of the school. Hours will be modified as needed.	
Appendix C does not have an unassigned fund balance of at least 2% of total revenues. This will place the school into a Financial Emergency situation at the end of Year 1. (Page 126)	Fund Raising income was not included in the budget. This line item will be added along with projected funds from donations and fund raising.	
The electrical and water budget does not contain enough funding to operate a commercial property.	It will be adjusted as necessary with location and size of property.	
The school's fund balances appear to be extremely low and do not appear to meet statutory requirements. (Appendix E)	We wrote this budget based on the income provided. We did not include any amount from fund raising or grants. We wanted to show that the school was viable just on the state and local income alone. We intend to do fund raising and apply for grants.	

18. 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 fiscal management system that is appropriate, follows generally accepted accounting principles and properly safeguards assets.
- Evidence of proper insurance coverage.

CRC Rating	Meets the Standard	Partially Meets the Standard	Does Not Meet the Standard
Preliminary	☐	☒	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
The applicant clearly identifies the governing board's responsibility for monitoring and overseeing the finances of the school. (Page 110)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: The school staffing plan and budget includes only a part time bookkeeper. How will day-to-day financial functions be addressed with this minimal staffing allocation? (Appendix B) The applicant indicates that the school will implement "rigorous internal control policies" but does not include these policies in the application. (Page 111) The application indicates that the school will contract for payroll services but the budgeted amount for those services appears to be low. (Page 111, Appendix E)	In a small school bookkeeping does not need to be done on a daily basis. As the school grows the bookkeeper hours will increase. These will be developed by Council and administrator before school opens. The Council treasurer will oversee these control policies The cost for payroll services we had at our previous school was in line with these projections.	The committee is concerned that the council treasurer does not meet the requirements for appropriate internal controls of school funds.

19. Action Plan
The Action 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	☐	☒	☐
Second	☐	☒	☐
Final	☐	☒	☐

Strengths
Key tasks for opening the school are identified. (Page 113)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
The committee requests additional clarification in order to fully meet the Standards for this area of application: The action plan included in the application identifies the key tasks to be completed and the timelines for completion. The plan does not, however, identify the person(s) responsible for each task or how the tasks will be funded if the school does not obtain a Federal start-up grant. (Page 113)	Threefold is a grassroots effort by many parents in the community. As such they have offered to volunteer their services to help the process of creating this school. Committees of volunteer parents are being developed to work on each task. The chairman of each committee has the task to fulfill the task assigned. A Council member is the coordinator of all the committees and reports back to the Council on a regular basis. Costs and funding are spelled out in Appendix D of the charter application	The applicant has not submitted a detailed action plan that adequately addresses the logistics of opening the school.