

**Sarasota County Public Schools  
2012-2013 Charter School Application Process**

**The Florida Center for Early Childhood Starfish Academy Charter Application**

**Charter Review Committee (CRC) Evaluation Findings and Final Ratings**

The evaluation findings are based on the extent to which the charter school application addressed the criteria required to meet each of the nineteen standards, as specified in the Florida Charter School Application Evaluation Instrument. Initial ratings are based on the CRC’s review and analysis of each charter school’s original application submitted on August 1, 2012. Second ratings were determined based on the applicants’ responses to the CRC’s questions and requests for clarification. Applicants were not permitted to amend the application or correct major or significant deficiencies identified in the original application. Considering all information presented, including the oral responses provided by each applicant during the September 27, 2012 Clarification/Capacity Interview Session, the CRC arrived at the final ratings for each standard through unanimous consensus.

**Charter Review Committee Final Ratings Summary**

Charter School Applicant	I. Educational Plan Standards 1 – 8  Mission & Purpose, Target Population Educational Program Design Curriculum Plan, Assessment & Evaluation ESE, ELL, School Climate & Discipline	II. Organizational Plan Standards 9 – 13  Governance, Management, ESP, Employment, Student Recruitment & Enrollment	III. Business Plan Standards 14 – 19  Facilities, Transportation, Food Service, Budget Financial Management & Oversight Action Plan	Overall Total
The Florida Center for Early Childhood Starfish Academy	37.5% Meets 0% Partially Meets 62.5% Does Not Meet	50% Meets 50% Partially Meets 0% Does Not Meet	100% Meets 0% Partially Meets 0% Does Not Meet	61% Meets 11% Partially Meets 28% Does Not Meet

## Florida Charter School Application Evaluation Instrument

Each section presents criteria for a response that meets the standard, and these criteria should guide the overall rating for the section. The Strengths and Weaknesses boxes provide space to identify data and other evidence that supports the rating. The rationale for each rating is important, especially if some of the data or evidence does not fit neatly into the criteria provided.

The following definitions should guide the ratings:

- Meets the Standard:** 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.
- Partially Meets the Standard:** The response addresses most of the criteria, but the responses lack meaningful detail and require important additional information.
- Does Not Meet the Standard:** 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)(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.

<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Second</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Final</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Strengths</b>
The school plans to support Pre-K-K students as they acquire the necessary social-emotional, language, literacy, and cognitive foundations in a developmentally appropriate research based learning environment. (Pg 3)
Focus will be on all students including the ESE and ELL populations. (Pg 3)
School principal and teachers will be FL certified. (Pg 5)
The Florida Center for Early Childhood is a reputable organization. ( P. 3)

**Concerns/Weaknesses:**  
 According to the FLDOE implementation, Kindergarten students should be taught using the Common Core State Standards (CCSS) not the Next Generation Sunshine State Standards (NGSSS). (Pg 6-9)

<b>Areas in Need of Additional Information and/or Clarification</b>	<b>Charter Applicant's Response</b>	<b>CRC Review/Comments</b>
<p>Required ESE and general ed for all Kindergarten teachers may prove difficult but attainable. However, the mission/vision lacks clarity. Is the intent to serve pre-K students with disabilities as well as general education pre-K students or is pre-K for ESE only and then Kindergarten for general education with ESE included (like every regular kindergarten in the district)? (Pg 4-6)</p>	<p>The above concern/weakness is noted and our Kindergarten students will be taught using the Common Core State Standards (CCSS). These standards set a clear roadmap for learning for teachers, parents and students.</p> <p>It is our goal to employ kindergarten teachers who have dual certification to include regular education and special education. In doing so, we hope to provide the highest quality of education to our children.</p> <p>Please reference the "Executive Summary" on page 2 of this application which states in the second paragraph that the Starfish Academy will serve preschool children in need of Exceptional Student Education (ESE) and kindergarten students with and without special needs (ESE/typically developing).</p>	<p>The applicant acknowledges the weakness in the application and states that students in Grade K will be taught using the Common Core State Standards.</p> <p>Yes, the executive summary states Pre-K is for ESE only, but it appears on pp 4 – 6 that non-ESE students will also be served? It is important that the applicant understand that the school will not receive FTE funding for gen ed Pre-K students. <b>CRC will seek clarification at the 9/27 interview session. ****</b></p> <p><b><u>Interview Findings:</u></b>                      The Guiding Mission appears to be clarified; the presenters did not clarify their understanding of the CCSS.                      The applicants gave confirmation that the Pre-K program will only include ESE.</p>

**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.
- If the applicant proposes to target certain populations, the projected student body should align with the overall mission of the school.

<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>Second</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Final</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Strengths**  
 Kindergarten classrooms will be conducted using an inclusionary model, so ESE and general education students receive instruction. (Pg 2)

**Concerns/Weaknesses:**

Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments																																																																								
<p>The applicant provides student enrollment projections by year, grade and class. Please provide this same information for each location, the Sarasota campus and the North Port campus. (P.10)</p>	<table border="1"> <thead> <tr> <th colspan="6">Proposed Grade Levels &amp; Total Student Enrollment</th> </tr> <tr> <th>Grade</th> <th colspan="5">School Year (Sarasota Campus)</th> </tr> <tr> <td></td> <th>FY13-14</th> <th>FY14-15</th> <th>FY15-16</th> <th>FY16-17</th> <th>FY17-18</th> </tr> </thead> <tbody> <tr> <td>Pre-K</td> <td>12</td> <td>12</td> <td>12</td> <td>12</td> <td>12</td> </tr> <tr> <td>Kindergarten</td> <td>18</td> <td>18</td> <td>18</td> <td>18</td> <td>18</td> </tr> <tr> <td>Total Enrollment</td> <td>30</td> <td>30</td> <td>30</td> <td>30</td> <td>30</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="6">Proposed Grade Levels &amp; Total Student Enrollment</th> </tr> <tr> <th>Grade</th> <th colspan="5">School Year (North Port Campus)</th> </tr> <tr> <td></td> <th>FY13-14</th> <th>FY14-15</th> <th>FY15-16</th> <th>FY16-17</th> <th>FY17-18</th> </tr> </thead> <tbody> <tr> <td>Pre-K</td> <td>12</td> <td>12</td> <td>12</td> <td>12</td> <td>12</td> </tr> <tr> <td>Kindergarten</td> <td>18</td> <td>18</td> <td>18</td> <td>18</td> <td>18</td> </tr> <tr> <td>Total Enrollment</td> <td>30</td> <td>30</td> <td>30</td> <td>30</td> <td>30</td> </tr> </tbody> </table>	Proposed Grade Levels & Total Student Enrollment						Grade	School Year (Sarasota Campus)						FY13-14	FY14-15	FY15-16	FY16-17	FY17-18	Pre-K	12	12	12	12	12	Kindergarten	18	18	18	18	18	Total Enrollment	30	30	30	30	30	Proposed Grade Levels & Total Student Enrollment						Grade	School Year (North Port Campus)						FY13-14	FY14-15	FY15-16	FY16-17	FY17-18	Pre-K	12	12	12	12	12	Kindergarten	18	18	18	18	18	Total Enrollment	30	30	30	30	30	<p>Response is acceptable. Enrollment counts are provided, as requested.</p>
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<p>The applicant does not address the anticipated projections for ESE students to be served in Pre-K and/or K. Please provide the projected percentage of ESE students to be served at each school location relative to the demographics of the areas to be served by each school location. (Pp 10 – 11)</p>	<p>For both Sarasota and North Port campuses the projection for ESE students to be served for Pre-K is 12/12 (100%) at each campus; for Kindergarten 8-9/18 (45%-50%) at each campus.</p>	<p>Acceptable response.</p>																																																																								

<p>Applicant does not explain the process of how the 8 to 9 Pre-K students will be selected for enrollment to the kindergarten classroom. Please explain. (Pg 10-11)</p>	<p>During the first year of enrollment (FY13-14), Pre-K ESE children who had been enrolled in our parent agency’s Pre-K classrooms for FY12-13 would be given enrollment preference to the Kindergarten classrooms due to their current public school status via School Board contract with parent agency. In subsequent years of operation, the Starfish Academy shall give enrollment preference to Pre-K students who have been admitted to the school through an appropriate admission process outlined below. This enrollment process would also apply to enrollment for the Kindergarten students:</p> <ol style="list-style-type: none"> <li>1) School will determine enrollment period and will make public announcement of enrollment deadlines. Written announcements to be posted in local newspapers, community flyers, bulletins, websites, etc.</li> <li>2) School will receive completed applications for enrollment by posted deadlines.</li> <li>3) If at the end of the enrollment period there are more spaces available than applicants applying, those students will be admitted and the school will initiate another enrollment period.</li> <li>4) If the school is over-subscribed at the end of an enrollment period, then all applications go into a lottery. The lottery is a system of random selection of applications that identifies students for enrollment and generates the school’s waiting list. During the lottery process all completed and accepted applications submitted during the enrollment period will be publicly drawn in random order until school capacity is reached. This lottery will take place soon after the closure of the enrollment period and will take place at a parent/teacher meeting</li> <li>5) Applicants that remain on the waitlist will be admitted when space becomes available based on their order of submission.</li> </ol>	<p>The response is appropriate.</p>
<p>Please clarify PK student population. Within description they speak about ESE student and general ed PK. Who will fund general ed PK? (Pg 10)</p>	<p>The general education pre-school will not be part of the charter school. It will continue as its own program and will be run totally by The Florida Center with continued funding support through parent fees, scholarships through grants, and Child Care Connection. Some subsidization is provided through contracts with Sarasota County and United Way.</p>	<p>OK</p>

**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.

<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 type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Second</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Final</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please note that the final rating remains “Does Not Meet” because the deficiencies found in the initial application were deemed significant and pertained to the most essential criteria for this standard. Although the applicant was permitted to clarify information and answer specific questions posed by the CRC in writing and/or during the interview, the applicant was not permitted to submit new information, add new sections, or make other substantive changes to the original application. During the interview process, the applicant was not able to demonstrate an understanding of the requirements or was not able to describe a plan to meet the standard thereby confirming the CRC’s rating.

<b>Strengths</b>
Literacy in Kindergarten is infused throughout the day. (Pg 12)
The school will follow the regular District School Calendar. (Pg 11)
Pre-K students will be supported as they acquire developmentally appropriate skills in the areas of social-emotional growth, literacy, and literacy. (Pg 12)
The school will promote and expect active parent involvement as students acquire the cognitive and behavioral skills necessary to become successful learners in the school and home environments. (Pg 12-13)

**Concerns/Weaknesses:**

The educational program design lacks the “specifics” especially in terms of instructional methods and specific strategies to be implemented for both their targeted population and those who are performing adequately. (Pg 12)

Allotment of 35 minutes per day for math, science and social studies in grade K. (Pg 12)

Reference to NGSSS-CCSS as one in the same is not the case. This reader needs clarification that the school knows which standards they need as a basis for their curriculum. (Pg 14)

Daily schedule minutes for Math/Science/Social Studies are not appropriate. (Pg 12-35)

Research-based principles presented were vague. (Pg 13-14)

Research-based principles loosely (if at all) connected the educational program design to the school’s mission nor does it evidence improved student performance.

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
<p>It is stated that PE will be scheduled, but it is not in the sample schedule. Please correct the schedule.(Pg 12)</p>	<p style="text-align: center;"><b>★Kindergarten Daily Schedule</b></p> <p>8:30am-8:45am (15 min.) Welcome Students/Duties/Tabletop Manipulatives              8:45am-9:15am (30 min.) Morning Message, Calendar Mathematics              9:15am-10:45am (90 min.) Literacy Block                  Whole Group/Small Group Instruction                  -storybook reading, shared reading                  -address components: comprehension, oral language, phonological awareness, phonics, fluency &amp; vocabulary              10:45am-11:15am (30 min.) Social-Emotional Group Activity/Quiet Time              11:15am-11:45am (30 min.) Literacy Block (Writing Workshop)              11:45am-12:45pm (60 min.) Mathematics              12:45pm- 1:15pm (30 min) Student Choice/Intervention Activities                  -individual/small group instruction may occur at this time</p> <p style="background-color: #e0e0e0;">1:15pm-2:15pm (30 min.) Physical Education (PE)</p> <p>2:15pm-2:45pm (30 min.) Group Time/Science, Social Studies, Thematic Activity              2:45pm-3:05pm (20 min.) Evaluate the day, prepare for tomorrow, sharing time, prepare for dismissal</p> <p><b>Note: All teaching materials will align with the Common Core Standards. Science and social studies will occur on alternate days and will also be woven in other activities throughout the day.</b></p>	<p>PE is now shown on the schedule. Response is acceptable. Applicant addressed specific concerns regarding scheduling However, the CRC needs to ask clarifying questions regarding the role of linguistics in reading success. <b>CRC will question further at the 9/27 interview to confirm a deep understanding. ****</b></p> <p><b><u>Interview Findings:</u></b>              The applicants clarified the role of linguistics in reading success.</p>

<p>More detail needs to be provided regarding the role of linguistics at the school and how it relates to reading success. (Pg 13)</p>	<p>Linguistic knowledge represents the rules for how language operates. The application of linguistic rules in the teaching of language is critical to reading success. Linguistic knowledge underlies competence in a language. Components include the following:</p> <ul style="list-style-type: none"> <li>• Phonetics- study of speech sounds</li> <li>• Phonology-study of combination of sounds into units of speech, the formation of syllables, words, etc.</li> <li>• Semantics- meaning components of language (vocabulary)</li> <li>• Morphology-study of words and their meaningful parts (grammar)</li> <li>• Syntax-rules of language that specify how to combine different classes of words (e.g., nouns, verbs) to form sentences (word order)</li> </ul> <p>Reading/reading comprehension requires the ability to construct linguistic meaning from written representations of language. This ability is based on the ability to construct meaning from spoken representation of language and decoding (e.g., ability to recognize written representation of words). Both language comprehension and decoding are complex abilities that are necessary for reading success. Neither is sufficient in itself. The ability to read and understand a passage of text depends upon the ability to decode the words in text and to understand the language the text is written in.</p> <p>It should also be noted that children draw on experiences within their immediate surroundings. Having well developed schema in particular domains of learning will also help with comprehension.</p>	<p>The applicant did their research and the response is appropriate.</p>
<p>There is no description of “how” the educational program aligns with the school’s mission. Please describe briefly.</p>	<p>This question is addressed on pages 13-14 under section D, “Explain how the educational program aligns with the school’s mission”.</p>	<p>Understood that <u>section D</u> is titled as such, however, the narrative provided does not fully address the information requested.</p>

**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-Common Core 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Second	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Final	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please note that the final rating remains “Does Not Meet” because the deficiencies found in the initial application were deemed significant and pertained to the most essential criteria for this standard. Although the applicant was permitted to clarify information and answer specific questions posed by the CRC in writing and/or during the interview, the applicant was not permitted to submit new information, add new sections, or make other substantive changes to the original application. During the interview process, the applicant was not able to demonstrate an understanding of the requirements or was not able to describe a plan to meet the standard thereby confirming the CRC’s rating.

<b>Strengths</b>
The OWL curriculum appears to be a good match for the goals of the school. (Pg 15)
Proposed curriculum is research based and comes from well known publishers. (Pg 15-17)
Curriculum will support students with the acquisition of developmentally appropriate behavioral and academic skills.
The proposed methods to evaluate the effectiveness of the curriculum are sound. (Pg 23)

**Concerns/Weaknesses:**  
 Reference to NGSSS-CCSS as one in the same is not the case. It appears that the applicant is not knowledgeable of which standards they need as a basis for their curriculum. (Pg 14)  
 The use of Storytown will need to be evaluated as it is not aligned to Common Core. (Pg 16)  
 The application lacks “specifics.” For example, “The curriculum will include alternatives...” but no alternatives are presented. (Pg 22)  
 Applicant does not describe or explain how the needs of advanced learners will be met; how will these students’ needs be met? (Pg 15-17)  
 The description of the curriculum does not demonstrate how it will meet the NGSSS-CCSS and support students in kindergarten with meeting expected state benchmarks in core areas.  
 MTSS:RtI is not addressed

Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments
<p>How will the instructional needs of students above and below grade level in reading be addressed? (Pg 19, 21)</p>	<p>The Starfish Academy will select a curriculum for reading and language arts that is aligned with the Common Core State Standards and uses a Fountas and Pinnell framework. A curriculum being considered is their Guided Reading Text Types published by Scholastic. This reading program for grades K-6 is designed to show students that reading comes in many forms-from pictures books to graphic novels. The program has built in everyday literacy features that connect classroom reading to a variety of real-world, informational texts. It differentiates instruction for all students with the goal of maximizing their growth and potential. Results from Kindergarten screening and assessments that include the FLKRS, FAIR and possibly the DIBELS will help place children in appropriate reading groups. Using ongoing observation and benchmark assessment of students, staff will consider the following when grouping students for guided reading and monitoring progress:</p> <ul style="list-style-type: none"> <li>● developmental stage of reading and reading level</li> <li>● their language proficiency level</li> <li>● the strategies they know how to use</li> <li>● the strategies they are ready to apply that have been previously taught</li> </ul>	<p>Weak response. This applicant has not demonstrated a sound understanding of the current standards. Using the following identifiers (NGSSS-CCSS) throughout the document does not demonstrate understanding. <b>CRC will question further at the 9/27 interview to confirm a deep understanding. ****</b></p> <p><b><u>Interview Findings:</u></b>                      The applicants did not explain how all (ESE and general education) students would be able to attain Sunshine State-Common Core Standards and receive learning gains for each year enrolled. Applicants had an incomplete response regarding the use of a Guided Reading Program to meet all reading needs.</p>

	<p>All students whether they are above or below grade level can be successful with this guided reading program because each students' needs are considered when forming appropriate groups or individual interventions, identifying appropriate materials and choosing appropriate teaching strategies. If a student is not responding to classroom interventions, a diagnostic measure will be administered to obtain more information on the student.</p> <p>This new program also provides teachers a Teacher's Guide that offers comprehension information on addressing the Common Core State Standards and response to intervention. Collecting, analyzing and sharing data on individuals and class will help evaluate the success of the program.</p>	
<p>There are now 6 components of instruction in reading. Description of how they are included in the reading curriculum is needed. (Pg 17, 18)</p>	<p>The 6 major components of reading include the following:</p> <ol style="list-style-type: none"> <li>1)Oral Language</li> <li>2)Phonological Awareness</li> <li>3)Phonics</li> <li>4)Fluency</li> <li>5)Vocabulary</li> <li>6)Comprehension</li> </ol> <p>These components are part of the reading program's design with lessons rich in language and literacy. Instructional components include interactive read-aloud activities, literature discussion/Book Clubs, guided reading and independent reading for those who may need differentiated instruction.</p>	<p>The applicant did not describe how the components are included in the reading curriculum is needed. <b>CRC will question further at the 9/27 interview to confirm a deep understanding. ****</b></p> <p><b><u>Interview Findings:</u></b> The applicants described the elements to be included in the reading block and the literacy activity in which students would be engaged.</p>

<p>Please clarify a student schedule to include sufficient time for math instruction and physical education.</p>	<p style="text-align: center;"><b>★Kindergarten Daily Schedule</b></p> <p>8:30am-8:45am (15 min.) Welcome Students/Duties/Tabletop Manipulatives              8:45am-9:15am (30 min.) Morning Message, Calendar Mathematics              9:15am-10:45am (90 min.) Literacy Block                  Whole Group/Small Group Instruction                  -storybook reading, shared reading                  -address components: comprehension, oral language, phonological awareness, phonics, fluency &amp; vocabulary              10:45am-11:15am (30 min.) Social-Emotional Group Activity/ Quiet Time              11:15am-11:45am (30 min.) Literacy Block (Writing Workshop)              11:45am-12:45pm (60 min.) Mathematics              12:45pm- 1:15pm (30 min) Student Choice/Intervention Activities                  -individual/small group instruction may occur at this time              1:15pm-2:15pm (30 min.) Physical Education (PE)              *2:15pm-2:45pm (30 min.) Group Time/Science, Social Studies, Thematic Activity              2:45pm-3:05pm (20 min.) Evaluate the day, prepare for tomorrow, sharing time, prepare for dismissal</p>	<p>The proposed blocks of time for an academic schedule are not in line with state requirements.</p>
<p>How will the school develop interventions on a continuum in order to meet the behavioral and/or academic needs of students continuously?</p>	<p>The school will develop interventions on a continuum in order to meet the behavioral and/or academic needs of children continuously by defining levels of interventions for Pre-K and Kindergarten students that are carefully planned and monitored. A Multi-tier System of Supports (MTSS): Response to Instruction/Intervention (RtI) will be put into place. The Starfish Academy will provide instructional support in tiers consistent with what can be found on Florida’s Response to Instruction/Intervention website, <a href="http://www.florida-rti.org">www.florida-rti.org</a>.</p> <p>Tier 1 Core, Universal Supports              Tier 2 Targeted Supplemental Support              Tier 3 Intensive, Individualized Support</p> <p>Assessment data as well as classroom observations will be used to allocate resources to improve learning for all of our students.</p>	<p>The response does not fully address the question of what <u>specific</u> strategies. <b>CRC will question further at the 9/27 interview to confirm a deep understanding. ****</b></p> <p><b><u>Interview Findings:</u></b>              Concerns remain about the applicants understanding that there must be specially designed instruction (SDI) to target the presenting area(s) of the identified disability that the Pre-K and kindergarten students have already been labeled with. General education RtI/MTSS does not apply to the preschool population; the applicants did not mention FBA/BPI or implementation of any type of a behavioral plan to address individual student needs; general interventions do not meet the intensity of the student populations that will be served.</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:

- Measurable educational goals and objectives that set high standards for student performance.
- 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.
- 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.

<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 type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Second</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Final</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please note that the final rating remains “Does Not Meet” because the deficiencies found in the initial application were deemed significant and pertained to the most essential criteria for this standard. Although the applicant was permitted to clarify information and answer specific questions posed by the CRC in writing and/or during the interview, the applicant was not permitted to submit new information, add new sections, or make other substantive changes to the original application. During the interview process, the applicant was not able to demonstrate an understanding of the requirements or was not able to describe a plan to meet the standard thereby confirming the CRC’s rating.

<b>Strengths</b>
The school proposes to follow the district’s Student Progression Plan (p. 25).
Assessment types are varied and include development, behavior and social, and communication skills assessment tools. (p.27)

**Concerns/Weaknesses:**  
 The applicant states that 100% of AYP will be met. However, AYP is no longer part of Florida’s Accountability Model. (Pg 24)  
 The educational goals and measurable student outcomes are vague and do not show how much academic improvement students are expected to show each year. (P.24)  
 References to federal and state accountability requirements are outdated and not relevant. (P 24)  
 The FAIR assessment does not provide data (scores) to determine “Grade-Equivalent growth,” as proposed by the applicant. The FAIR is a criterion – referenced not norm- referenced test. (p.24)  
 The applicant’s response to Section F. on page 27 is somewhat weak and is not clearly focused on what is asked in this section, which is to describe how data will be used to evaluate the effectiveness of instruction (not the students). (P. 27)  
 It is not evident that the applicant fully understands the district’s student progression plan.

Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments
<p>The school proposes to use the district’ Student Progression Plan, which does not address Pre-K. What are the school’s procedures/standards for placement and promotion for Pre-K. (P. 25)</p>	<p>Progression decision for our Pre-K children would be based on recommendations of the professional team working with the child and the child’s parent or legal guardian. The team may consist of but not be limited to Principal, teacher, speech-language pathologist, occupational therapist, etc. This team would discuss the child’s progress based on testing on developmental areas of cognitive, communication, motor, adaptive skills and personal social, accomplishment of IEP goals and objectives and overall social and emotional development observed at home and in the classroom. From this discussion, the team would make recommendations for placement, establish IEP goals for the next year if indicated and make any suggestions for appropriate teaching strategies that may be effective for this child.</p>	<p>It still remains unclear as to how Pre-K ESE students will be identified. What is the role of Child Find? <b>The CRC will ask for clarification at the 9/27 interview session ****.</b></p> <p><b>Interview Findings:</b>                      Applicant could not explain the Standards that would be used to promote and retain its population of Pre-K students.</p>

<p>Please provide further detail as to how “one-year equivalent growth” is determined on the BDI-2 and how “showing improvement” on the DECA will be demonstrated. What are the specific measurable outcomes and results expected each year? (p. 24)</p>	<p>The BDI-2 will be administered to our Pre-K children to assess skill levels in learning domains of motor, adaptive, cognitive, communication and personal social. Norm referenced scores (e.g. scaled scores, standard scores) can be obtained at the subdomain level and combined to provide an overall performance quotient. Percentile ranks and age equivalent scores are also available for subdomain and developmental quotient. “One-year equivalent growth” refers to age equivalent growth. Teachers/therapists will use assessment to develop appropriate goals and objectives in identified areas of need and then use classroom/therapy performances, parent input and an annual reassessment to monitor student progress and effectiveness of teaching strategies.</p> <p>Improvement on the DECA is demonstrated by administering a pre/post test. Before administering the DECA in a classroom, the teacher should take four weeks to get to know the child. Parents are also encouraged to administer the assessment within a week of the teacher. During each administration, areas of resiliency that include Initiative, Self-Control and Attachment and Behavior are measured via direct observation of the child. Raw scores, standard scores and percentile ranks obtained in these areas provide a baseline of skill level and enable teacher to use as a progress monitoring tool. The DECA can be ideally administered three times a year. <b>Teachers can use the tool to evaluate effectiveness of strategies</b> in supporting the development of protective factors and minimizing or eliminating challenging behavior. Measurable outcomes will include:</p> <ol style="list-style-type: none"> <li>1) Child will demonstrate 75% improvement in gaining more self-confidence in learning to manage feelings.</li> <li>2) Child will demonstrate 75% improvement in establishing healthy relationships with adults and peers.</li> </ol> <p>Child will demonstrate 75% improvement in behavior.</p>	<p>Response is acceptable.</p>
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<p>The CELLA assessment is not included (p 25). Please explain how/when the CELLA will be administered and how results will be used.</p>	<p>It was in error that the Comprehensive English Language Learning Assessment CELLA Assessment was not included in Section 5 of this application that described student assessment tools used. The CELLA is a statewide assessment tool used to measure the progress of English Language Learner’s proficiency in English in areas of listening, speaking, reading and writing. This is to ensure that ELL students have the skills needed to achieve at high levels academically. The CELLA is administered between March-April each year; for 2012-2013 between March 4-April 5, 2013. Results obtained are useful for charting student progress over time; new students over the first year. Information about language proficiency levels can be useful in making decisions regarding placement into, or exiting from ESOL programs. Assessment also provides useful information in identifying strengths and challenges in English.</p>	<p>It is apparent that the applicant reviewed district and state policies and procedures. <b>The CRC will follow-up with additional questions at the 9/27 interview session. ****</b></p> <p><b><u>Interview Findings:</u></b>          Applicant acknowledged the error and researching the accurate information. Responses were appropriate.</p>
<p>Please explain how the use of journals to assist students in self-observation, goal setting, etc. (p.28) are appropriate for Pre-K ESE and Kindergarten students.</p>	<p>Journals for this Pre-K and Kindergarten students was intended to be expressed as an instructional tool to help students begin to express themselves by reflecting on what they learned during a particular thematic activity. The teacher may ask the student to draw/write about what they learned; tell teacher what he/she learned while teacher transcribes. The journal may be used by the student to then communicate his school experience with his peers and his parents at home.</p>	<p>Acceptable response.</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:

- Clear description of the levels of service the school will provide to students with disabilities.
- A clear description of how the school will ensure that students with disabilities (SWD) will have an equal opportunity of being selected for enrollment.
- 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.
- 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 projection.

<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>Second</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Final</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please note that the second rating remained “Partially Meets” because the deficiencies found in the initial application were deemed significant and pertained to the most essential criteria for this standard. Although the applicant was permitted to clarify information and answer specific questions posed by the CRC in writing and/or during the interview, the applicant was not permitted to submit new information, add new sections or make other substantive changes to the original application. During the interview process, the applicant was not able to demonstrate an understanding of the requirements or was not able to describe a plan to meet the standard thereby resulting in a lower rating.

**Strengths**  
 The school’s Pre-K program is focused and targeted to ESE students.

**Concerns/Weaknesses:**  
 The applicant did not provide a description of how they will ensure that students with disabilities will have equal access to the school. Simply stating that SwD is the target population does not fully answer the question posed in section B. (P 30).  
  
 The applicant is advised that the District will not provide a staffing specialist or a school psychologist. That is the responsibility of the school.

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
Please re-state the “discrimination statement.” (6.C- Pg.33 paragraph 3)	The school will be committed to equal opportunity. Admissions shall be open to all district residents on a non-discriminatory basis without regard to race, color, national origin, disability, creed, sex, ethnicity, behavior, age (pre-k, kindergarten), ancestry, and proficiency in English language.	Response is acceptable.
Please review certification requirements to be a Principal and Asst. Principal of a school in the State of Florida Teacher Job description. (6-H - Pg 36)	Certification requirements to be a Principal and Assistant Principal of a school in the State of Florida were reviewed and it is noted that the Principal and Assistant Principal, in addition to holding a Master's degree or higher, one must hold a valid professional certificate covering educational leadership, administration, or administration and supervision. The Starfish Academy will follow these requirements.	Response is acceptable.
The response to Section 6 I is not complete. Describe how the school will serve gifted and talented students. (Pg 37)	<p>The school staff will familiarize themselves with Florida's definition of “Gifted” which states that “a student is determined to be eligible for gifted services as defined by the state rule, Rule 6A-6.03019, FAC, Specialized Instructional Programs for Students Who Are Gifted”. This rule states that a gifted student is “one who has superior intellectual development and is capable of high performance. The minimum evaluations for determining eligibility include:</p> <ul style="list-style-type: none"> <li>● Need for a special instructional program</li> <li>● Evidence of characteristics of the gifted</li> <li>● Evaluation documenting intellectual development</li> </ul> <p>These are all defined in the Florida Plan for K-12 Gifted Education that the school will align with to serve this special population of students. In doing so, the school will implement a meaningful plan for students that will ensure their needs are met and include the following goals clearly detailed in the Florida Plan:</p> <p>(1)Identification of Gifted Learners                  (2)Program Design &amp; Service Delivery                  (3)Curriculum &amp; Instruction                  (4)Guidance &amp; Counseling</p>	<p>The response is a description of the state requirements but does not answer the “how” question. <b>CRC will question further at the 9/27 interview to confirm a deep understanding. ****</b></p> <p><b>Interview Findings:</b>                  Since the applicants could not explain the school's plan for delivering services to gifted students, the CRC was unable to evaluate its effectiveness for this population of students.</p>

	<p>(5) Program Administration &amp; Management                  (6) Professional Development                  (7) Program Evaluation</p> <p>After need for services is determined, developing an Education Plan (EP) is critical in how we will deliver the services that meets the individual learning needs of the student. An EP team defined in the plan as parent/guardian, teacher of the gifted, teacher of regular education, student as appropriate, etc. will meet to determine what steps to take in ensuring an appropriate education will be provided. <b><i>Services may be provided in different service delivery models at our school that may include, support facilitation, cluster grouping or pull out.</i></b> All students will be expected to master basic curriculum aligned with the Common Core State Standards. To accomplish this and meet the individual goals of the EP, the teacher may use differential curriculum. Teachers will differentiate, replace, supplement, compact, and/or modify curricula to facilitate higher level learning goals for the gifted. Four hours/week of instruction will be provided to our Kindergarten students to enable them to focus on their EP specific goals. The WOGI website (<a href="http://www.ufwogi.com">www.ufwogi.com</a>) appears to be a wonderful resource parents, teachers and administrators have work with gifted children!</p>	
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**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)

**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.
- 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Second	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Final	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please note that the final rating remains “Does Not Meet” because the deficiencies found in the initial application were deemed significant and pertained to the most essential criteria for this standard. Although the applicant was permitted to clarify information and answer specific questions posed by the CRC in writing and/or during the interview, the applicant was not permitted to submit new information, add new sections or make other substantive changes to the original application. During the interview process, the applicant was not able to demonstrate an understanding of the requirements or was not able to describe a plan to meet the standard thereby confirming the CRC’s rating.

**Strengths**  
The school will follow the district’s ELL plan. (Pg 37)

**Concerns/Weaknesses:**  
Reference to graduation and GED seems inappropriate given the school is Pre-K and K. (Pg 38)

It is apparent that the applicant is not familiar with district’s ELL plan. The applicant is advised to refer to District ELL Plan for testing timeline and information on instruments to be used to assess student’s linguistics ability and growth. (Pg 38, 39)

The applicant frequently refers to “Hispanic.” Students from many different races, ethnicity and cultures are English Language Learners. (Pg 40-41)

Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments
<p>Concerned about alternate teaching strategies to be implemented? (Pg 37)</p>	<p>Alternate teaching strategies on page 37 should read “differentiated” teaching instruction. These teaching strategies may include but are not limited to the following:</p> <ol style="list-style-type: none"> <li>1) <b>Preview, View, Review</b> (Freeman)-ex. Children receives information first in his native language about what upcoming lesson is to occur. As lesson is then introduced in English, the teacher can use story mapping that builds schema with visual anchors.</li> <li>2) <b>Total Physical Response</b> (Asher)-ex. Pairing vocabulary words to be taught with physical action; similar to playing a game like “Simon Says”.</li> <li>3) <b>Using Visualization and Schema</b> (Beck, McKeown, Kucan, Marzano)-ex. Learning vocabulary by creating schema that connects to what is already know.</li> </ol>	<p>Acceptable response.</p>
<p>Please clarify how ELL students will be engaged in and benefit from the curriculum as well as how language development will be addressed. (Pg 40, 41)</p>	<p>It is understood that English Language Learners (ELL) are students from many different races, ethnicity and cultures. Making reference to the Hispanic population was not appropriate and so noted. It is noted in our application that we would align with the District English Language Learner (ELL/LEP) Plan. ELL students will engage in curriculum activities that support the Common Core State Standards and support differential instruction such as the ESOL strategy examples outlined above. The district proposes using in addition to ESOL strategies, approaches that include:</p> <ul style="list-style-type: none"> <li>• Sheltered-English</li> <li>• Sheltered-Core/Basic Subject Areas</li> </ul> <p><b><i>These approaches would provide instruction in English to students classified as English Language Learners only</i></b></p> <ul style="list-style-type: none"> <li>• Mainstream/Inclusion-English</li> <li>• Mainstream/Inclusion-Core/Basic Subject Area</li> </ul> <p><b>These approaches would provide instruction in English to students classified as English Language Learners and fluent English-Speakers.</b></p>	<p>The response is a literal description of the state/district requirements. It does not convey a thorough understanding of the needs of ELL.</p>

	<p>Teachers at The Starfish Academy when using the “sheltered” instructional approach would use clear, direct, simple English and a wide range of scaffolding strategies to communicate meaningful input in the content areas to students. Learning activities that connect new content to students’ prior knowledge, that requires collaboration among students, and that is embedded through curriculum material, offer ELLs the grade-level content instruction of their English speaking peers. This will occur while adapting lesson delivery to their English proficient level. Critical to effective sheltered instruction is the preparation of learning objectives for every lesson.</p> <p>Teachers using the “mainstream” instructional approach will provide an environment to support total immersion. This will enable students to acquire English language in a manner similar to the way they acquired their Native language, naturally and through regular interactions with others who already know the language. Some strategies to help students meet content standards may include but not be limited to using visuals that reinforce spoken words, employ gestures for added emphasis, exaggerate intonation, adjust speech (e.g., speak slowly, enunciate, use longer pauses), etc.</p> <p>Overall language development will support the development of the 6 components of reading identified in previous curriculum section. Particular focus on the development of function (purpose of communication), form (structure of language/grammar &amp; syntax), fluency (ease in speaking the language) and vocabulary. Development of wide variety of vocabulary is essential to reading comprehension success.</p>	
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		<p><b>CRC will question the applicant about the ELL requirements in general to confirm a deep understanding of the requirements and to determine if the school would have the capacity to implement services. ****</b></p> <p><b><u>Interview Findings:</u></b></p> <p>It was apparent that the applicant had not reviewed the district’s ELL plan. Earlier in the process the applicant was advised to refer to District ELL Plan for testing timeline and information on instruments to be used to assess student’s linguistics ability and growth. However, it was clear that the applicant had not reviewed the District ELL Plan since they did not have an understanding of assessment instruments and criteria for program entry. At this time, the applicant does not demonstrate an understanding of state and federal requirements regarding the education of English language learner students nor demonstrates capacity to meet the school’s obligations under state and federal law regarding the education of English language learner students.</p>
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**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)

**Evaluation Criteria:**

A response that meets the standard will present:

- A sound approach to classroom management and student discipline.
- Legally sound policies for student discipline, suspension, and dismissal.

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

Please note that the final rating remains “Does Not Meet” because the deficiencies found in the initial application were deemed significant and pertained to the most essential criteria for this standard. Although the applicant was permitted to clarify information and answer specific questions posed by the CRC in writing and/or during the interview, the applicant was not permitted to submit new information, add new sections or make other substantive changes to the original application. During the interview process, the applicant was not able to demonstrate an understanding of the requirements or was not able to describe a plan to meet the standard thereby confirming the CRC’s rating.

<b>Strengths</b>
The application provides specific examples of teaching and modifications. (Pg 41)
The school will follow the district’s Code of Conduct for discipline and suspension with adaptations for K population of special need students. (Pg 41)

<b>Concerns/Weaknesses:</b>
The guidelines stated on page 42 are contrary to State Board Rule.
The application does not provide legally sound policies for student suspension.
There is no evidence that Starfish Academy will have a school wide PBSS plan.

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
<p>There is no mention of school wide discipline handbook procedures, lack of process to deal with extreme behaviors. Please explain how this will be aligned to your school mission and to the individual needs of students. (Pg 42)</p>	<p>A school wide discipline handbook, consistent with all school board procedures, will be implemented following the district's Code of Conduct for discipline and suspension as stated on Pg 41. The school will not provide any policies/procedures that are contract to State Board Rule. There will be a school wide PBSS plan and all teachers will be trained in PBSS. The parent organization currently utilizes PBSS in all classrooms and will provide the training through their trained PBSS facilitator. Students will be evaluated on an individual basis and provided the necessary behavioral supports utilizing the MTSS:RTI process. The school will follow the district's process for extreme behaviors, constant communication with the parent, and referral for mental health services from the parent organization if deemed necessary and parents agree. This process fits extremely well with the mission of the school to support those young children at risk of school failure due to delayed social emotional development or other developmental challenges that might be contributing to unacceptable behaviors. The school will incorporate the MindUp curriculum , specifically aimed at self-regulation, self-reflection, and sound social emotional development.</p>	<p>The response does not address the CRC's concerns. <b>Further clarification will be requested at the 9/27 interview session. ****</b></p> <p><b>Interview Findings:</b> The applicant did not demonstrate an understanding regarding the significance of using a FBA/BIP to guide the process of developing appropriate behavioral goals and interventions to meet the needs of Pre-K and Kindergarten students with extreme behavior and emotional disorders. Concerns continue to exist about the applicants understanding of the Due Process that must be afforded to students with a disability when taking disciplinary actions.</p>
<p>There is no plan outlined for dismissing students from the school. What procedures/guidelines will be used? (Pg 41-42)</p>	<p>Every effort will be made with the child and parent to maintain the child in the school. If the level of the child's behavior reaches a point of presenting significant safety concerns to self or others, the school will use the same policies/procedures for dismissal of students from the school as outlined in the district's Code of Conduct.</p>	<p>It is not apparent from the response that the applicant understands the district procedures they propose to follow. <b>CRC will question further at the 9/27 interview to confirm a deep understanding. ****</b></p> <p><b>Interview Findings:</b> Concerns continue to exist about the applicants understanding of the Due Process that must be afforded to students with a disability when taking disciplinary actions.</p>

**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(9)

**Evaluation Criteria:**

A response that meets the standard will present:

- Documentation of proper legal structure of the governing board, or a plan to organize in conformity with the laws of Florida.
- A clear understanding and description of the governing board’s responsibilities.
- 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 sensible method for resolving disputes between parents and the school.

<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>Second</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Final</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Strengths</b>
The applicant has an established governing board. (P 48)
The process for resolving complaints/grievances is clearly explained. (Pg 86 Appendix C)

**Concerns/Weaknesses:** A clear understanding and description of the governing board’s responsibilities has not been provided

The roles and responsibilities in relation to governance and school management are not clear.

It appears from the organizational structure that the local charter is not running the school.

Please note that a majority (50% plus one) rather than a quorum is required for action. (By-Laws Appendix A Pg 70)

Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments
<p>Please clarify the organizational chart. (Pg 43)</p>	<p>The local charter school is running the school. The school will operate under its own Governing Council/Board of Directors independent of the parent agency’s Governing Board. The dotted line between the two Boards represents a “liaison” relationship between the Boards to ensure a flow of communication, support, and accountability. The school will be managed on a day-to-day basis by the school Principal, in consultation with the VP of EI Services when needed. The Principal has the responsibility and authority to make all day-to-day decisions related to all aspects of the school. The VP directly supervises the school Principal. The Principal will be involved in all Board meetings and report to the Board the successes/challenges of the functioning of the school. The Governing Board is not involved in day to day activities of the management of the school and the Governing Board’s roles and responsibilities are clearly defined on pages 44-47, with a listing on page 46. In essence, the Board supports and promotes the school’s mission, establishes short and long term planning through a strategic planning process, sets school policy and oversees policy in all areas, fulfills a legal responsibility, provides oversight of financial policies and requirements, supports the hiring of the school principal and participates in evaluation of the principal, and serves as an ambassador in promoting the school in the community. By-laws have been changed to reflect a majority (50+1) is required for action. (Appendix A-pg 70).</p>	<p>The applicant did not fully meet the requirements of this section. The liaison relationship intimated in the applicant’s response is not satisfactory in delineating the separate duties and responsibilities of the charter governance board versus the parent company. Moreover, the applicant’s response infers that the parent company is the deciding body on areas of critical importance to school operations such as HR, IT and facility, rather than a willful choice on the part of the charter board to contract with an entity they feel best supports the school mission and vision.</p> <p>There is no provision for how any disagreement between the parent company and the local charter board will be reconciled. <b>The CRC will pursue this matter further at the clarification interview. ****</b></p> <p><b>Interview Findings:</b> The applicants could not articulate a sensible method as to how the school’s local governing board and the parent company would resolve any disputes.</p>

<p>Please clarify the relationship between FCEC and Starfish Academy.</p>	<p>Starfish Academy will operate as an independent local charter with its own Governing Board. The Florida Center, as a not-for-profit (501 c 3) organization, will serve as the parent organization. The Florida Center, with years of non-profit history and experience, will provide a sound infrastructure for the school in the areas of HR, IT, facilities, etc. It will also provide the financial structure and resources necessary to fiscally manage the school with all necessary separation of duties in place. The Governing Board of The Florida Center and the CEO will serve in an advisory capacity to the Board of the charter school in whatever capacity may be beneficial to the success of the school. This may include board and staff training, fundraising, board mentoring, etc.</p>	<p>There is no provision for separation between the school and the parent company that allows to the school to continue independently should the charter board no longer wish to continue the relationship. <b>The CRC will pursue this matter further at the clarification interview. ****</b></p> <p><b><u>Interview Findings:</u></b> The applicants could not articulate how the school and the parent company would dissolve its relationship.</p>
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**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 and selection of the school leader.
- A viable and adequate staffing plan aligned with the projected student enrollment.
- A sound plan for recruiting and retaining qualified and capable staff.

<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>Second</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Final</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Strengths**

The plan for recruitment, selection, and retention of employees is adequate. (Pg 53-54)

Professional development opportunities are available and employees at all levels are expected to participate.

The staffing plan is appropriate. (Pg 51)

**Concerns/Weaknesses:**

The management structure does not provide a clear delineation of the roles and responsibilities for administering the day-to-day activities of the school.

Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments
<p>Please clarify the relationship between the parent company and the school. (Pg 50)</p>	<p>This is further clarified on pgs 47-48 and in above section. The parent company provides significant infrastructure to the school, serves in an advisory capacity from the Board and CEO, and can be a source for additional necessary services (behavioral/mental health services and parent education). In terms of day-to-day management of school activities, the school principal has the responsibility, authority, and accountability for managing the school. Administrative support from the VP of Early Intervention Services and CEO is available if necessary. The school principal directly supervises the administrative assistant to the school and the teachers and teaching assistants.</p>	<p>Because concerns stated here are related to those stated under the Governance section, the CRC will ask for clarification during questioning about governance. <b>The CRC will request clarification at the 9/27 interviews. ****</b></p> <p><b><u>Interview Findings:</u></b> Concerns continue to remain about the delineation of responsibilities between the school and parent company.</p>

**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 of how the proposed relationship with the ESP will further the school’s mission.
- 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Second	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Final	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Strengths</b>
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<b>Concerns/Weaknesses:</b>
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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 or a sound plan for development of policies and procedures.

<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Second</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Final</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Strengths</b>
The application fully addressed this section.

<b>Concerns/Weaknesses:</b>
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<b>Areas in Need of Additional Information and/or Clarification</b>	<b>Charter Applicant’s Response</b>	<b>CRC Review/Comments</b>

**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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Second	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Final	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Strengths**  
 The recruitment outreach plan is well developed and the applicant proposes a comprehensive and multi-faceted campaign to notify parents of the opportunity to enroll in the school (p. 56)

**Concerns/Weaknesses:**  
 Based on the information presented, it is not apparent that the applicant is familiar with public school enrollment and admissions policies.  
  
 Having enrollment status connected to the parent contract is related more to a “magnet” school/program; the proposed school is not a magnet program, so the contract’s verbiage may need to be changed. (Pg 60)

Areas in Need of Additional Information and/or Clarification	Charter Applicant's Response	CRC Review/Comments
<p>The proposed enrollment and lottery process is unclear. In order to ensure equal access, F.S. 1002.33 (10)(b) specifies that "The charter school shall enroll an eligible student who submits a timely application, unless the number of applications exceeds the capacity of a program, class, grade level, or building. In such case, all applicants shall have an equal chance of being admitted through a random selection process." The lottery process needs to occur after all enrollment periods and all applications are received before the cut-off date. Please clarify. (P. 58).</p>	<p>The charter school will follow all public school enrollment and admissions policies and strictly adhere to F.S. 1002.33. This process is summarized below::</p> <ol style="list-style-type: none"> <li>1) School will determine enrollment period and will make public announcement of enrollment deadlines. Written announcements to be posted in local newspapers, community flyers, bulletins, websites, etc.</li> <li>2) School will receive completed applications for enrollment by posted deadlines.</li> <li>3) If at the end of the enrollment period there are more spaces available than applicants applying, those students will be admitted and the school will initiate another enrollment period.</li> <li>4) If the school is over-subscribed at the end of an enrollment period, then all applications go into a lottery. The lottery is a system of random selection of applications that identifies students for enrollment and generates the school's waiting list. During the lottery process all completed and accepted applications submitted during the enrollment period will be publicly drawn in random order until school capacity is reached. This lottery will take place soon after the closure of the enrollment period and will take place at a parent/teacher meeting</li> <li>5) Applicants that remain on the waitlist will be admitted when space becomes available based on their order of submission.</li> </ol>	<p>The applicant demonstrates an understanding of the admissions procedural requirements. The CRC remains concerned that the enrollment period is brief. Additionally, students in the Florida Center for Early Childhood program will likely feed into the charter Pre-K ESE and K program, so care must be taken to ensure equal access to parents of students not in FCEC.</p>
<p>What type of "audition" will be required of students for admission? (Pg 56)</p>	<p>The word "audition" is a typo. No audition will be held for enrollment to the school. Sentence should have read, "Information advertising the opportunity to <b>apply</b> for admission to the school will circulate through various media, etc."</p>	<p>OK</p>

**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 acquiring 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Second	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Final	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Strengths</b>
Two facilities are proposed. The Sarasota facility is currently used for early childhood and pre-K classrooms. (Pg 61)

<b>Concerns/Weaknesses:</b>
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Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments

**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)

**Evaluation Criteria:**

A response that meets the standard will present:

- A transportation plan that will serve all eligible students.

<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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Second</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Final</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Strengths</b>
Starfish Academy proposed to contract with the district for transportation services. (Pg 62)

<b>Concerns/Weaknesses:</b>

<b>Areas in Need of Additional Information and/or Clarification</b>	<b>Charter Applicant’s Response</b>	<b>CRC Review/Comments</b>

**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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Second	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Final	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Strengths</b>
The school will contract with the Sarasota County Schools for food services. (Pg 62)

<b>Concerns/Weaknesses:</b>
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Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments

**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.
- A sound plan to monitor the budget and make adjustments as necessary.

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"/>
Second	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Final	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Strengths**

**Concerns/Weaknesses:**  
 The applicant did not complete section D on page 63. There is a reference to Appendix G, which is a 2009 procedural document from the Florida Center for Child and Family Services. (P. 63)

<b>Areas in Need of Additional Information and/or Clarification</b>	<b>Charter Applicant's Response</b>	<b>CRC Review/Comments</b>
Please provide the formula used to generate the budget for Medicaid reimbursement.	37 eligible students ( percentage based on current school board pre-k enrolled receiving Medicaid covered services) 3.5 units (1 unit equals ½ hour) per week per Medicaid eligible student 48 weeks of service (budget is based on 12 months- reflects continued service) \$33.94 equals reimbursement rate per unit 37 students x 3.5 units x 48 weeks x \$33.94 unit rate= \$210,971 Reduced figure by 36 units to accommodate student absent days.	Response is acceptable.

**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 clear description of how the school’s finances will be managed. The description must include assurances that the governing board retains ultimate control over the school’s finances.
- A clear description of strong internal controls. The system of internal controls must be sufficient to safeguard finances.

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"/>
Second	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Final	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Strengths**

**Concerns/Weaknesses:**  
The reader is directed to a list of appendices rather than providing a clear description in narrative form of how finances will be managed. (section A, p 64)

Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments
Appendices G – L are documents with procedures and protocols from the Florida Center for Child and Family Development dated 2009. This information does not clearly address the application sections on page 18. Please address.	Appendices were attached to show that we currently have policies and procedures in place to ensure proper oversight and safeguards. Additionally, the agency has undergone a name change during the past year. We are currently reviewing and updating all policies to reflect that name change. To address/clarify responses in Section 18- <b>Who will manage the school’s finances and how the school will ensure financial resources are properly managed-</b> The Florida	Who is the CEO? Determination as to whether this standard is met is contingent upon the applicant’s explanation of the governance structure and the relationship between the parent company and the charter school. Based on the response provided in the Governance Section of this report, the

	<p>Center implements ethical financial practices that are consistent with G.A.A.P. and Red Book standards, along with OMB A-133 Single Audit guidelines. Policies and procedures are reviewed periodically to assess adherence to such standards of best practice. We maintain an internal accounting control system that addresses accurate and efficient management of funds. The school financial resources will be managed and/or reviewed by the school Principal, CFO, CEO and the Starfish School Board of Directors with reports to the Agency Finance Committee and Agency Board of Directors. The Florida Center utilizes a modified accrual accounting system. Financial statements are prepared individually by each program/department and funding source. Internal accounting controls include procedures and records concerned with the safeguarding of assets and the reliability of financial records. They include- an inclusive chart of accounts, prompt/accurate recording of revenues and expenses, safeguarding and verification of assets, control over expenditures and separation of duties to the extent possible. Fiscal records are maintained for cash, payroll, payables, fixed assets, funding sources and general ledger with automated software. Records are retained to satisfy the administrative, fiscal, legal and historical needs of the agency.</p> <p><b>The financial controls, including an annual audit and regular board review of financial statements, which will be employed to safeguard finances-</b> Internal account control objectives have been established to monitor compliance with policies and procedures established by management to prevent errors, omission and fraud; to provide accurate financial information and to meet contractual compliance with government contracts and grants. The CEO, CFO and Principal will report and collaborate with the school governing Board about the current financial status, financial planning, potential problems, and funding alternatives. Financial statements will be prepared monthly from the general ledger and reviewed monthly by the CFO, CEO, Principal and school governing Board. They contain actual, budget and variance from budget for year to date. Additionally, the CFO will report said financial statements and monthly review to the Treasurer and Agency Finance Committee. The Treasurer will take this information to the Agency Board of Director. The agency governing board will remain</p>	<p>applicant's response infers that the parent company is the deciding body, not the school's governing board.</p> <p><b>The CRC will pursue this matter further at the clarification interview. ****</b></p>
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	<p>aware of all financial operations and collaborate with external auditors to ensure accuracy and integrity of financial management by undergoing an annual financial audit. This audit will take place within 180 days following the end of a given fiscal year. The audit will be conducted by an independent certified public accountant approved by the governing board. Following an audit, the entire agency governing body will meet with the independent auditor to review findings and the auditor’s report, accompanying financial statements, and any accompanying management letter. The agency governing body will be responsible for accepting the auditor’s report, overseeing a plan for management to address recommendations of any management letter in a timely manner, where necessary and making the report available to the public.</p>	
<p>The applicant did not fully respond to the insurance coverage information requested under E on page 18. The insurance certificate referenced as Appendix M is insufficient. Please respond.</p>	<p><b>Insurance Detail-</b>                  Current summary of Insurance carried by The Florida Center:  <b>Worker’s Compensation:</b>                  Each Accident 500,000/Disease Policy Limit 500,000/ Disease Each Employee 500,000  <b>Commercial General Liability:</b>                  General Aggregate 3,000,000/Each Occurrence 1,000,000  <b>Professional Liability:</b>                  Aggregate Limit 3,000,000/Liability Limit 1,000,000  <b>Abuse and Molestation:</b>                  Aggregate Limit 3,000,000/Liability Limit 1,000,000  <b>Business Automobile:</b>                  Liability 1,000,000/Uninsured Motorists 1,000,000  <b>Employee Benefits Liability:</b>                  Aggregate 1,000,000/1,000,000 Each Claim  <b>Management Liability:</b>                  D &amp; O 1,000,000/Employment Practices 1,000,000/ Fiduciary Limit 1,000,000  <b>Accident Policy:</b>                  Accidental Medical Expense 35,000/Death 10,000                  Accidental Dismemberment 20,000/Catastrophic cash 50,000</p> <p>Coverage’s meet all “State Mandated Assessments” and are reviewed annually to insure coverage meets Agency needs and State/Contract</p>	<p>Response is acceptable.</p>

	<p>requirements. Coverage will be reviewed and modified prior to charter school program implementation to insure all state/federal mandates and requirements are met.</p> <p><b>Employee Benefits:</b> Health Insurance is offered to all full-time employees. Employer pays 75% of cost for employee coverage. Employee pays 25% with option of adding family members at employee's expense. At employees expense they may also add dental, vision, life, LTD and/or STD.</p> <p>Benefits are reviewed annually.</p>	
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**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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Second	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Final	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Strengths</b>
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<b>Concerns/Weaknesses:</b>
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Areas in Need of Additional Information and/or Clarification	Charter Applicant’s Response	CRC Review/Comments
Discrepancies in the action plan timelines for some activities compared to timelines specified in prior sections of the application (p 65). Please correct timeline.	Action Plan/Timetable corrected. See Attachment “1”	The plan is acceptable.