

Sarasota County Public Schools
2013-2014 Charter School Application Process
Charter Review Committee (CRC) Analysis of Application and Initial Findings – September 11, 2013

Pivot Charter School Charter Application

Dear Charter Applicant:

This document provides the Charter Review Committee’s (CRC) initial findings based on their review and analysis of the application submitted to the district on August 1, 2013 (and corrected on August 14, if applicable). The CRC feedback is divided into three categories: 1) Strengths, 2) Concerns/Weaknesses and 3) Areas in Need of Additional Information and/or Clarification. The CRC is offering each applicant an opportunity to respond to the “Areas in Need of Additional Information/Clarification.” The addenda process may not be used to submit new information (not requested) or substantive changes to the submitted application.

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

- Use the column labeled “Charter Applicant’s Response” to address the questions and requests for clarification listed.
- Please respond briefly and succinctly to the specific information requested in each section of the application.
- Do not submit information that is not requested.
- Do not respond to the remarks under “Concerns/Weaknesses.” Applicants are not permitted to correct major deficiencies or amend the original application, therefore, please do not enter information in this box.

The completed document must be submitted electronically to the Office of School Choice and Charter Schools no later than 4:30 pm on Wednesday, September 18, 2013. Also provide 6 hard copies of the document. Please follow the directions provided on the cover letter regarding format, number of copies, etc. when you submit your revisions. If you have questions, call (941) 927-9000, ext. 32262.

Florida Charter School Application Evaluation Instrument

The following definitions guided the CRC’s ratings:

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|-------------------------------|--|
| 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.

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

Strengths

Pivot Charter School’s mission statement clearly defines the school’s focus.

Pivot offers a blended educational model whereby grades 6 – 12 students take courses online and also receive instruction and support at a school site. (Pages 9-11)

Provides a learning environment where virtual instruction is the “primary” mode of curriculum delivery to students. (Pages10-16)

Concerns/Weaknesses:

Comment Only – The virtual provider Advanced Academics, Inc. It is not a FLDOE approved provider. Although permitted under state statute, it is a concern of the CRC that the AAI program does not meet the FLDOE specifications.

Comment only -- in years past the virtual learning environment was indeed innovative. Nowadays parents have a variety of choices for a

virtual learning environment – Sarasota Virtual School, Sarasota Virtual Academy, Part-time and full-time FLVS. Online instruction, while relatively new, is no longer as innovative as Pivot claims. (Page 15)

References to “See Appendix” are noted but are not found in the Appendix. Perhaps application error. (Pages 11, 26)

The applicant says that the environment is to be one that is of a blended model, however, the EC’s role is described as more of a “liaison” and an “instructional coach” not that of a certified teacher who delivers direct instruction to students in a classroom setting. (Pages 10, 11)

It appears that students will be doing online course work outside the school setting. Students in a blended environment must receive the online instruction in a classroom setting in the brick and mortar school as per 1002.33(7) (a)2.b, F.S.

If in fact the EC will be delivering direct instruction, there is a lack of clarity on who will be the student’s teacher of record: EC or contracted VIP assigned teachers. (Page 10)

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|--|------------------------------|
| The application states that because of the use of a virtual curriculum online the school is able to “forgo the expense of textbooks.” Later in the application the applicant discusses additional support and/or instruction provided during the onsite class time. Are any hardcopy instructional materials used during the on-site Sessions? (Page 13) | |
| If the on-site Educational Coordinators don’t have the certification for a particular course, how then are they qualified to provide the “course tutoring” or “small group direct instruction” or instructional intervention to students who are struggling? (Pages 11, 13 & 25) | |

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.

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

Strengths

Pivot School will be open to all grades 6 – 12 students in Sarasota County. (Page 19)

The application describes a thorough study of the demographics to target their population. (Pages 22-23)

Concerns/Weaknesses:

The committee has concerns regarding the projections presented in this section in relation to the projections for ESE students presented in Section 6. Please see Section 6 for the committee’s specific concerns.

The applicant assumes that because of the school performance grades of surrounding schools that students who enroll in Pivot may very likely be proficient or higher. This is a faulty assumption. (Page. 24) The way the last statement reads (last paragraph on page 24) it implies that minority students should be recruited in order to include low performing students in the school.

There is not a clear understanding of the students that the school intends to serve.

| Areas in Need of Additional Information and/or Clarification | Charter Applicant's Response |
|--|------------------------------|
| What other criteria should parents consider to determine if their child is suited for online instruction, such as familiarity/experience with computer technology, owning a computer at home? (Page 19) | |
| Regarding the statement that the ECs will be staffed at a ratio of 25:1 for high school per session. Is the Session the A (morning) or B (afternoon) session or are you referring to a class period. Please clarify "per session." (Page 20) | |

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

Strengths

The proposed educational design aligns with the school’s mission and focus. (Page 43)

Expectations for students to complete a service learning project provide a real world link. (Page 38)

Concerns/Weaknesses :

The application is not clear as to the roles and duties of the ECs or their qualifications. It is unclear as to who the teacher of record will be for the students’ courses in the classroom setting.

Pivot will contract with Advanced Academics, Inc (AAI) for the provision of the curriculum and the online instruction. It will be necessary at a later time to verify that the AAI teachers, who are not Pivot employees, meet Florida’s criteria for highly qualified status and are certified to teach the particular course. (Page 27)

The application does not provide a clear description of the school’s daily schedule and the hours of instructional time. The application states that students will receive instruction 24/7 and that the expectation is that students complete two hours of coursework outside the

8:00 – 1:00 or 11:30 – 4:30 school session. (Page 125) The math does not add up? Students in a blended environment must receive the online instruction in a classroom setting in the brick and mortar school as per 1002.33(7) (a)2.b, F.S.

The applicant mentions that the EC is providing individual and small group direct instruction, however it is unclear how this would be reflected in the master schedule during a regular school day. (Page 27)

The applicant is not clear whether students are receiving online instructional support from their teacher of record or another AAI instructor with appropriate certification. (Page 29)

It is not clear if the intent is to submit the Pivot Sarasota application as “replication of an existing school design” based on the state criteria. It is confusing because Sections 3.F and 3.G are partially completed. (Pages 44-45)

The applicant references the Pivot Charter School in Lee County and the one in Hillsborough County in support of the effectiveness of the Pivot educational program. (Page 44) However, both Pivot Schools obtain significantly low student achievement results on the 2013 FCAT Writing, Science, Reading, Mathematics and on the End-of-Course (EOC) exams.

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|---|------------------------------|
| Please provide a sample of a daily schedule for a student that reflects the time spent at the physical school site. | |
| Please provide a typical work schedule for the EC that shows time teaching, managing, tutoring, etc. | |
| Approximately what proportion of the 5 hours on site are students receiving direct instruction with an onsite teacher (rather than working online with AAI or another online tutorial program)? (Page 25) | |
| The application states that the 5 hour block of time students are on-site is broken into 45 minute sessions. Will an EC or other adult be present during each session? The school plans to serve 242 students and hire 6 ECs. How many students per EC. | |
| One section states that because of the blended model “our onsite teachers do not necessarily need to hold all of the certifications for all of the courses the students are taking.” (p. 13) In another section it states that they are highly qualified teachers that may serve an instructional role. (Page 26) | |
| Who is the teacher of record for the students’ courses? | |

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| <p>Are the ECs primarily teachers or mostly supervising students while they receive instruction from Advanced Academics, Inc.? In what cases does the EC become the teacher of record?</p> | |
| <p>Although the other two Florida Pivot Charter Schools did not have sufficient number of students to receive a school performance grade, the applicant should submit achievement data trends (FCAT, EOCs, SAT/ACT, graduation rates, etc) to demonstrate the following criteria: “effectiveness of an existing school design can be demonstrated by providing evidence of organizational viability and <u>the success of the academic program</u>, including compliance with legal requirements, as well as a <u>direct relationship between program elements and student achievement.</u>” (Model Florida Charter School Application Criteria, page 44) Please provide achievement trend data (FCAT, EOC) in a summary chart for the Hillsborough and Lee County Pivot schools.</p> | |
| <p>The application does not fully address section 3.G. The response is general in nature and does not provide “well-defined strategies for replication, including the financial and human resources necessary to replicate the design.” (Model Application Criteria p. 45). Please explain further.</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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| Final | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Strengths

Concerns/Weaknesses:
 The application does not provide a clear and coherent framework for teaching and learning. The blended model is unclear.
 Required reading must be provided by the school. It is unacceptable to require student to purchase reading materials or go to the library. (Page 49)
 The application is missing – English IV – College Prep and the Reading and Writing for College Success Courses.
 The applicant is not consistently clear on how middle school courses and high school credits will be recovered. (Pages 49-73)
 The applicant plans to use a platform/program called ROAD TRIPS to reduce the amount of lessons that a struggling Gen Ed and/or special needs student will have to complete; there are no details on how the EC will provide direct instruction to remediate the deficient

areas. (Page79)

The applicant does not explain how students remaining for the extended time will be transported home if they require transportation by Pivot Charter School. Or, are parents of struggling students expected to make special arrangements for school transportation? (Page 79)

The applicant does not give information pertaining to the supports/strategies/interventions that will be used in Tier 1. (Page 80)

In a blended model where students schedules are individualized, how will you be able to meet the needs of those students who need daily reading intervention? Reading Plus = 45 minutes (2-3 days) plus the EC teacher must be reading endorsed/certified.

| Areas in Need of Additional Information and/or Clarification | Charter Applicant's Response |
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| What grade level are the US history and the civics course addressed? (Page 68) | |
| In the social studies sequence, there are only 2 of the 3 core social studies courses listed, how would the civics content be addressed? (Page 68) | |
| How will you address the updated and revised careers exploration at the middle school level based upon SB 1076? (Page 69) | |
| How will the changes in the economics courses reflecting financial literacy through SB 1076 be addressed? (Page 73) | |
| Identify who as "low on FCAT or PARCC" will participate in Reading Plus. (Page 77) | |
| In a blended model where students schedules are individualized, how will you be able to meet the needs of those students who need daily reading intervention with a qualified instructor? E.g., Reading Plus = 45 minutes (2-3 days) plus the EC teacher must be reading endorsed/certified. | |
| If the students are being served for Reading Intervention by an AAI teacher, he/she must be reading certified. Will the AAI instructors who are outside of state have Florida's NGCAR-PD or Reading endorsement? | |
| Are parents of struggling students who have to come early or remain in school beyond the Session time expected to make special arrangements for school transportation? (Page 79) | |

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.

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

Strengths

The goal to have a 90% graduation rate with a 3-5% increase each year is a high standard. (Page 97)

Pivot Charter school plans to administer parent and student surveys to collect feedback and satisfaction ratings. (Page 96)

Concerns/Weaknesses:

Comment Only: Goals 1 – 3 are more formative in nature (e.g., daily completion rates in coursework) rather than school goals or performance outcomes based on summative assessments and metrics. (Page 93)

Comment Only: Goal 6 is considered a program implementation objective – having a high tech multimedia learning studio – and not tied directly to student outcome measures. (Pages 94-95)

Pivot has not set any educational goals for improving student achievement in writing, science, technology (other than ELA and math) or any goals based on summative measures such as EOC or AP exams. (Pages 93-97)

The applicant’s response to Section 5.D lacks detail about how state assessment data will serve as a baseline and how it will be used to identify the educational strengths and needs of students. (Page 100)

It is highly unlikely that Pivot will be able to fully evaluate the effectiveness of instruction given that the teachers are not their employees.

The application addresses how assessment results will be shared with parents. However, plans for distributing state assessment results are not provided. It is not clear whether the ROADS system will include student results for FCAT/PARCC, EOCs, AP. (Page 104)

It appears that the school will not offer students the opportunity for course recovery during the summer. The plan is to offer remediation/course recovery the following school year. (Page 97) The application conveys that the school will retain middle school (MS) students who fail 2 courses during the school year as a method of course recovery (97); this does not align with the district’s MS Student Progression Policy (SPP).

The applicant discusses available diploma designations but does not include the procedures that will be used to track students’ progress towards satisfying requirements for diploma designations.

The MS Promotion policy outlined in the Policy Manual does not align with the district’s MS SPP. (Page 299)

The applicant did not reflect the correct number of credits required to earn a diploma from a public high school in Sarasota County. (Page 99)

The applicant did not include a weighted grade scale in its Policy Manual. (Page 299)

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|--|------------------------------|
| <p>Goal 7 pertains to students having a post-secondary plan and sounds more like a program objective rather than an education goal. A more appropriate goal based on student achievement outcomes would be one that targets college readiness (PERT, ACT, SAT) or performance on accelerated courses. Will the school set performance targets for college readiness?</p> | |
| <p>The application states that the Scantron Performance Series Assessment is standards based. Please clarify – is the assessment aligned to Common Core? Is it aligned to specific courses? (Page</p> | |

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| 101) | |
| Will the ROADS system include student results for FCAT/PARCC, EOCs, AP, etc? (Page 104) | |
| The MS Promotion policy outlined in Policy Manual does not align with the district's MS SPP. Please clarify. (Page 299) | |

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.

| 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"/> |
| Final | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Strengths

Concerns/Weaknesses:
 The application does not present evidence of a clear understanding of the MTSS process from referral to evaluation to eligibility and access to services. (Page 106)

The application does not provide the school’s projected population of students with disabilities or describe how the projection was made. The data regarding the ESE prevalence in the County is from Orange County and not from Sarasota County. (Page 109)

The application does not fully address the staffing plan for the school’s special education program, including the number and qualifications of staff.

- The narrative does not include the number of projected staff needed to meet the needs of their projected ESE students. (Page 110)
- The application shows a lack of understanding of the required certification for ESE staff.

Based on the application, it appears that the applicant does not have a clear understanding of gifted eligibility requirements, guidelines and the process for services. (Pages 110-111)

There is no evidence to show that the applicant has an understanding of IEP requirements for students that are transition age.

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|--|------------------------------|
| Clarify the level of service that the school will provide to students with disabilities. Section A, by way of check mark, indicates regular classroom, but Section C, page 106, references the full continuum of services. | |
| Section C, page 106 – Clarify the applicant’s expectations of “School District staff assigned to our school”. Section C – Clarify understanding of the term “LEA.” | |
| Section H – Narrative does not include the number of projected staff needed to meet the needs of their projected ESE students. | |

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

Strengths

Concerns/Weaknesses:
The application does not fully address or provide sufficient detail to determine if the school will provide ELL students with the necessary programs and services. (Page 113)

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|--|------------------------------|
| Is the school planning to implement the District’s ELL plan or the state’s plan? There are discrepancies in what the application is proposing to implement. For example, please refer to District ELL Plan for initial assessment timeline (Page 113) and for specific requirements and timeline based on Teacher Category. (Page 115) | |

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| Clarify how ELLs will receive comprehensible instruction and ESOL strategies through the online environment? (Page 116) | |
|---|--|

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

Strengths

Pivot has high expectations for its grade 6-12 student population. (Page 119)

Pivot states that it will adhere to the district’s Code of Student Conduct in most instances (page 120) and Policy Manual (page 292). However, some discrepancies are apparent (see below).

Concerns/Weaknesses:

It appears that the applicant does not have a clear understanding of the policies and procedures with regard to discipline of students with disabilities. (Page 123)

The student discipline procedures are not outlined and do not provide sufficient information to determine if conduct procedures are appropriate. (Page 120)

- The application did not include a research based PBS model to design a school wide and classroom behavior management system. (Pages 119-120)
- The application does not fully address the procedures and guidelines on how MTSS will be used to intervene with inappropriate

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| <p>behavior in Pivot’s classrooms and campus wide school environment. (Pages 119-124)</p> <ul style="list-style-type: none"> • The applicant does not include or discuss any preventive measures that will be taken to identify and address inappropriate behavior displayed regularly by groups of students or school wide problem areas. (Pages 119-124) • The applicant intends to dismiss any student found to have drugs in their possession, however, does not provide dismissal procedures that will be followed if such a situation arise. (Page 120) • The applicant acknowledges that it will follow Due Process for students under IDEA, but it does not include the procedures that will be implement to ensure Due Process is given to students who have an IEP or 504. (Pages 123-124). |
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| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|---|------------------------------|
| How the “behavioral contract” will be used is unclear. (Page 119) Please clarify. | |
| Who will make up Pivot’s “Behavior Team” that reviews parent appeals regarding discipline actions taken by the principal? And, who and how are these individuals selected to serve on this appeals team? (Appendix E, Page 295) | |

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.

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

Strengths

Concerns/Weaknesses:
 The Pivot governing board members are not residents of Sarasota County. They are the Pivot Education Inc. Board of Directors. Although permitted in state statute, it is the belief of the CRC that it in the best interest of the parents/students that governance and oversight of the school be under the direction of local board members who understand the needs of its stakeholders and the unique Sarasota County community. (Pages 127-129)

Secondly, the Pivot Board will only have two public meetings in Sarasota. Again, permitted by law, but not in the best interest of the parents and community stakeholders in that it does limit the number of opportunities for parents and citizens to attend the open public charter school board meetings.

The relationship between the Pivot Governing Board and the provider Advanced Academics, Inc. (AAI) is unclear. Based on the definition of an ESP, it appears that AAI should be considered an ESP. AAI is providing a loan to the school. AAI is signing the agreement with CSSCI, Pivot’s back office service provider. There is no explanation of how the governing board will ensure that an “arm’s length,” performance-based relationship exists between the governing board and the AAI. (See Section 11 – ESP and the sample contract in Appendix I)

Application errors – references appendix in three different locations without denoting which appendix number. (Page 129)

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|---|------------------------------|
| Please elaborate on the partnership relationship with Advanced Academics, Inc. and the services provided. What is the fee (percentage) for instructional services and the fee for consultant/management services? (Page 136) | |
| The application states that Advanced Academics Inc will provide consulting and project management services. They also contract with Charter School Services Corporation. What are the respective roles of each provider as it relates to school management? | |

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.

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

Strengths

The salary schedules are reasonable.

Concerns/Weaknesses:

Pivot has job descriptions but they are lacking in the area of qualifications. They are more a listing of job duties rather than job descriptions.

The delineation of the roles and responsibilities between the contracted service providers, AAI and CSSC is not clear. (Page 139 and Section 11 – ESP)

It is of concern that the school will not have an ESE liaison on staff (and will rely instead on the statewide ESE coordinator. (Page 140)

The school will not have an on-site guidance counselor in its first year of operation. (Page 140)

With the exception of the “Education Coordinators” a large majority of the teachers are not school employees. Therefore the majority of Pivot school staff will not be part of the new Teacher Evaluation System. (Page 149)

Comment only. The CRC questioned the necessity of the applicant to submit over 175 pages of the FLDOE teacher/principal evaluation system documents in order to convey that they acknowledge the requirements. A more informative approach would entail providing specifics about the personnel.

Application Error – appendix listed but not denoted. (Page 139)

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|--|------------------------------|
| AAI provides the on-line curriculum and the platform. AAI also provides “access to online FL credentialed teachers.” (Appendix I) Who does AAI contract with for teachers? | |
| Given that the school will not have an on-site guidance counselor the first year, how often will the “state expert/guidance” person be available on site at the brick-and-mortar school? (Page 140) | |
| The school will NOT have an ESE liaison on staff (and will rely on the statewide ESE coordinator). Please describe the proportion of time, if any, that a person will be on-site to facilitate IEP meetings and other IDEA-required activities. (Page 140) | |
| Given that the online classroom teachers are contracted AAI employees, will parents annually receive “a list of all teachers’ qualifications” that includes the AAI teachers? (Page 143) | |

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

Strengths

Concerns/Weaknesses:
The applicant states on the Cover Page of the application that the school will not contract with an ESP yet this section of the application is completed. (Page 145) The applicant does not consider the services provided by AAI at meeting the definition of an ESP. However, AAI will have a contractual agreement to provide the curriculum, instructional materials, teachers, the online platform, progress monitoring tools, assessment results, etc. In addition, AAI provides a letter of financial support to Pivot Charter. The school will receive a start-up loan of \$450,000 from AAI. AAI is to sign the agreement with CSSCI, Pivot’s back office service provider. It is the CRC’s opinion that these services comprise the bulk of the school’s education program and online management, thereby meeting the definition of ESP. It is the CRC’s opinion that the relationship of AAI to the school meets the definition of ESP.

Error – several omissions and blanks. (Pages 146, 147)

| Areas in Need of Additional Information and/or Clarification | Charter Applicant's Response |
|---|------------------------------|
| Why is this section of the application completed when the applicant states (cover sheet) that the school will NOT contract with an education service provider (ESP)? (Page 145) Please clarify. | |

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.

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

Strengths

Concerns/Weaknesses:
 The non-discrimination statement is incomplete by state standards.

Comment only: while we appreciate that the applicant is aware of the requirements for principal and teacher evaluation, it was not necessary to include over 175 pages of the DOE’s evaluation protocol and documents.

Given that the AAI teachers are not employees of Pivot, the Pivot principal is not authorized to evaluate the AAI teachers. The school district will not have meaningful or comprehensive teacher evaluation results for the Pivot school. Parents will not be able to discern teachers’ effectiveness in the same manner as parents of other schools.

It appears that the applicant proposes to use Florida-wide (across all Pivot schools) student growth (VAMS) data for the personnel evaluation of the ECs that work in the Sarasota school. (Appendix G) Please clarify.

| Areas in Need of Additional Information and/or Clarification | Charter Applicant's Response |
|---|------------------------------|
| <p>Given that the AAI teachers are not employees of Pivot, the Pivot principal is not authorized to evaluate the AAI teachers. Does AAI provide performance appraisal information for their teachers?</p> | |
| <p>The draft contract with AAI states that AAI provides” access” to FI qualified teachers. Are these teachers employees of AAI or does AAI contract with another provider for the online teachers?</p> | |
| <p>Who are the teachers described in the chart on page 397 in Appendix G? AAI teachers or Pivot teachers?</p> | |

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

| |
|--|
| Strengths |
| The application addresses all of the enrollment and admissions procedures required of Florida charter schools. (Pages 154-156) |
| Pivot School will not require a parent contract as a requirement of continued enrollment. (Page 156) |

| |
|-----------------------------|
| Concerns/Weaknesses: |
| None. |

| | |
|---|-------------------------------------|
| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
| None. | |

III. Business Plan

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

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

Strengths

The applicant has demonstrated adequate knowledge of the steps required in acquiring a site for the school and has already completed at least 3 other schools.

Concerns/Weaknesses:

The applicant has not chosen a site as of this application and the reviewer could not find any budget information in the application as to the estimated cost related to the design and construction that would be required for the build out of the acquired facility.

\$17 per s.f. including custodial and basic utilities is not realistic for Sarasota County.

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|--|------------------------------|
| None. | |

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.

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

| |
|---|
| Strengths |
| The applicant confirms that the school will adhere to F.S. 1002.33 and Charter 1006(1)(e) discipline. |

| |
|--|
| Concerns/Weaknesses: |
| The transportation Revenue/Expense data is conflicting and very unclear. |

| Areas in Need of Additional Information and/or Clarification | Charter Applicant's Response |
|--|------------------------------|
| Questions on school utilizing carpooling and PAC assisting parents. | |
| It appears that the plan is to have parents responsible for transporting students in the p.m. session until the school builds capacity conflicts with F.S. 1002.33. (Page 163) Please clarify. | |
| How was the estimate that 25% of students will need transportation determined? | |

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

Strengths

Concerns/Weaknesses:
 The NSLP program may NOT be offered only to students who qualify for free and reduced meals as this is considered overt identification of economically needy students and is strictly prohibited by federal law.

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|---|------------------------------|
| Where will the nutritious snacks and beverages come from and who will make the determination of the standards they meet? (Page 165) | |
| What efforts, if any, will be given to ensure nutritional standards are met? | |

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

Strengths

Concerns/Weaknesses:
 The 5-year summary budget does not match the detailed budget submitted in Appendix C, pages 203-235.

In Appendix C the dollar amount for the state charter capital outlay has been increased 50% above the per student amount being received for 2013-2014. It does not seem reasonable to expect another 50% increase for 2014-2015. Also the reason the school in Hillsborough County is receiving the state capital outlay is that the district as a whole is SACS accredited. In Sarasota each individual school is SACS accredited. Clarification from the state will need to be rendered on if the school would be allowed to receive the state capital outlay funds the first year of operation.

The required audit expense could not be located in Appendix C.

The projected student enrollment for year 1 is 241; year 2, 291; year 3, 338; year 4, 385; and year 5, 432. We are unable to determine if staff funding is appropriate because the number of teachers be provided by AAI in unknown. Based only on the number of ECs funded

there are 6 in year one for an average class size of 40 students; year 2, 7 teachers funded for an average class size of 42 students; year 3, 7 teachers for an average class size of 48 students; year 4, 9 teachers for an average class size of 43 students; and in year 5, 9 teachers for an average class size of 48 students.

The school has estimated 10% of their students will be ESE. This generates an additional \$27,588 to be used for the ESE Students. There is no provision for any ESE staff other than a \$10,000 allocation on page 220 for consultant services. This seems to indicate the students will not receive the services needed to claim the extra ESE funding based upon the students ESE matrix.

In summary, the detail in Appendix C is not in agreement with the budget submitted in Section 17. The reserves that are indicated in both Section 17 and Appendix C appear to be inflated without properly recognizing the costs for the appropriate staff that need to be funded and no audit expenditure. Items missing in the budget and revenues that need confirmation are material enough to reduce the reserves, which may put the school at risk of being in a financial deficit.

The application lists a start-up loan of \$450,000 from AAI. The loan documents/debt repayment terms are not provided. The budget shows interest on loans as revenue.

| Areas in Need of Additional Information and/or Clarification | Charter Applicant’s Response |
|---|------------------------------|
| Reference is made to fundraising to supplement FTE funding. (Page 173) How will the use of fundraising dollars “supplement” FTE funding? | |
| Please obtain clarification from the state to determine if the school would be allowed to receive the state capital outlay funds the first year of operation. | |

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"/> |
| Final | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Strengths

September 16, 2013 Addenda

September 16, 2013 Addenda to the CRC Analysis of Application and Initial Findings – September 11, 2013

Subsequent to our review and preparation of the charter school application initial findings, we became aware of issues regarding the financial condition of other Pivot Charter Schools currently operating in the State of Florida. Given that the charter governing board and Executive Director for the Pivot charter application for Sarasota are the same as those for the Pivot charters for Hillsborough and Lee Counties, it is of great concern that both of these schools appear to be in a state of deteriorating financial condition. Our understanding is based on the following information:

Pursuant to s.1002.33(9)3, Florida Statutes, charter schools are required to provide the sponsor with a monthly financial statement. Pivot Education, Inc.’s unaudited financial statement submitted to Hillsborough County Schools as of June 30, 2013 appears to reflect a “deteriorating financial condition” as defined in s.1002.345. A deteriorating financial condition means a circumstance that significantly impairs the ability of a charter school to generate enough revenues to meet its expenditures without causing the occurrence of a condition such as failure to pay wages and salaries owed to employees.

According to Hillsborough County Schools' records, Pivot Education, Inc. reported a deficit unassigned fund balance of \$18,384. Salaries, benefits and payroll taxes payable were reported at \$94,248.

Pivot Education, Inc.'s unaudited financial statement submitted to Lee County Schools as of June 30, 2013 reflects an unassigned fund balance of \$20,077 (1% of revenues). Section 1011.51, Florida Statutes, requires district school boards (may not apply to charter schools?) to maintain an unassigned fund balance of at least 3% of general fund revenues. In the fiscal year ended June 30, 2012 Pivot Education, Inc. reported a deficit unassigned fund balance of \$70,311.

Concerns/Weaknesses:

The application has conflicting internal control procedures.

There is a concern that expenditures over \$25,000 only require the signature of a single board member for approval. (Page 175) AAI signing the agreement with CSSCI, Pivot's back office service provider, is of great concern.

There is a concern that the Executive Director and Board members are not local, but financial decision-making authority over \$1500 requires another level of approval. How will they ensure timely payment of invoices? (Checks returned to school by CSSCI unsigned)

There is conflicting language on Section 18, page 175 (3rd bullet) and Appendix J CSSCI Contract on page 601, part III (1st paragraph). Who is responsible for ensuring financial transactions are coded properly?

| Areas in Need of Additional Information and/or Clarification | Charter Applicant's Response |
|--|------------------------------|
| There is conflicting language on Section 18, page 175 (3 rd bullet) and Appendix J CSSCI Contract on page 601, part III (1 st paragraph). Who is responsible for ensuring financial transactions are coded properly? | |

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"/> |
| Final | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| |
|-----------|
| Strengths |
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|----------------------|
| Concerns/Weaknesses: |
|----------------------|

| Areas in Need of Additional Information and/or Clarification | Charter Applicant's Response |
|---|------------------------------|
| What are the anticipated "changes to curriculum" mentioned in the action plan timeline? Will AAI, who provides the online curriculum, make modifications so close to the start of the school year? (Page 181) | |
| The action time line does not include activities or a timeline for marketing, recruitment, student enrollment, lottery, etc. When are these activities planned to take place? (Page 181) | |