





TO: P-12 Education Committee

FROM: Allison Armour-Garb 

SUBJECT: Renewal Recommendation for Charter School Authorized by the Board of Regents

DATE: May 27, 2021

AUTHORIZATION(S): 

SUMMARY

Issue for Decision

Should the Board of Regents approve the proposed renewal charter for the following charter school authorized by the Board of Regents pursuant to Article 56 of the Education Law (the New York Charter Schools Act):

- **Collegiate Academy for Mathematics and Personal Awareness Charter School** (short-term, two-year renewal and revisions to approve a contract between the school and the Center for Educational Innovation (CEI), whose proposed relationship meets the NYSED criteria for an entity that provides comprehensive management services; and to decrease the school's currently authorized enrollment from 375 students to 120 students, phased in over the school's proposed charter term).

Reason(s) for Consideration

Required by State statute.

Proposed Handling

This issue will come before the P-12 Education Committee and the Full Board for action at its June 2021 meeting.

Procedural History

The New York State Education Department (NYSED) made the renewal recommendation being presented to the Board of Regents for approval and issuance as required by Article 56 of the Education Law and 8 NYCRR 119.7.

Background Information

The Board of Regents and NYSED are bound by law, regulation, and Regents-endorsed internal policies regarding the criteria that can be considered in decision making pertaining to the authorization of new charter schools, charter school renewals, and charter school revisions. Detailed information on these laws, regulations, and Regents-endorsed internal policies can be found in the Appendix.

As State assessments were not administered in the 2019-2020 school year due to the COVID-19 pandemic, NYSED is not able to include results from that academic year in the analysis of Benchmark 1 of [the Charter School Performance Framework](http://www.p12.nysed.gov/psc/regentsoversightplan/SectionIIIPerformanceFramework.html) (<http://www.p12.nysed.gov/psc/regentsoversightplan/SectionIIIPerformanceFramework.html>) for the school presented in this Regents Item. This school has implemented significant academic turnaround/intervention programs during its current charter term, which are therefore not reflected in the Benchmark 1 ratings for this school.

Related Regents Items:

November 2012: [Board of Regents Charter School Renewal Policy](https://www.regents.nysed.gov/common/regents/files/documents/meetings/2012Meetings/November2012/1112p12a1.pdf)
(<https://www.regents.nysed.gov/common/regents/files/documents/meetings/2012Meetings/November2012/1112p12a1.pdf>)

Collegiate Academy for Mathematics and Personal Awareness Charter School

December 2013 [Initial Charter](https://www.regents.nysed.gov/common/regents/files/1213p12a2%5B1%5D.pdf)
(<https://www.regents.nysed.gov/common/regents/files/1213p12a2%5B1%5D.pdf>)

April 2015 [Grade Level and Enrollment Reduction Revision](https://www.regents.nysed.gov/common/regents/files/meetings/Apr%202015/415p12a4.pdf)
(<https://www.regents.nysed.gov/common/regents/files/meetings/Apr%202015/415p12a4.pdf>)

Recommendations

It is recommended that the Board of Regents take the following action:

VOTED: That the Board of Regents finds that the **Collegiate Academy for Mathematics and Personal Awareness Charter School**: (1) meets the requirements set out in Article 56 of the Education Law, and all other applicable laws, rules and regulations; (2) the applicant can demonstrate the ability to operate the school in an educationally and fiscally sound manner; (3) granting the application is likely to improve student learning and achievement and materially further the purposes set out in subdivision two of Section twenty-eight hundred fifty of this article; and (4) granting the application would have a significant educational benefit to the students expected to attend the charter school, and the Board of Regents therefore approves the renewal application of the **Collegiate Academy for Mathematics and Personal Awareness Charter School** and that a renewal charter be issued, and that its provisional charter be extended for a term up through and including **June 30, 2023**.

Timetable for Implementation

The Regents action for the above-named charter school will become effective immediately.

Collegiate Academy for Mathematics and Personal Awareness Charter School

In accordance with Education Law, Article 56, Sections 2851(4) and 2852(2), Commissioner’s Regulation 119.7, and the Board of Regents Charter School Renewal Policy, the **New York State Education Department recommends a short-term renewal for a period of two years for Collegiate Academy for Mathematics and Personal Awareness Charter School. The charter term would begin on July 1, 2021 and expire on June 30, 2023, and the school would be permitted to revise its charter to enter into a contract with the Center for Educational Innovation (CEI), whose proposed relationship meets NYSED’s criteria for an entity that provides comprehensive management services; and to decrease the school’s currently authorized enrollment of 375 students to 120 students, phased in over the school’s proposed charter term.**

Charter School Summary

Name of Charter School	Collegiate Academy for Mathematics and Personal Awareness Charter School
Board Chair	Ms. Viola Abbott
District of Location	NYC CSD 19 ¹
Initial Commencement of Instruction	Fall 2016
Charter Term	Initial Term: September 8, 2016 - June 30, 2021
Current Term Authorized Grades/Authorized Enrollment	Grades 6 - 8 / 375 students
Proposed Renewal Term Authorized Grades/Proposed Authorized Enrollment	Grades 6 - 8 / 120 students
Comprehensive Management Service Provider	None
Facilities	1962-84 Linden Boulevard in the East New York neighborhood of Brooklyn - Private Space
Mission Statement	<i>The Community of the Collegiate Academy for Mathematics and Personal Awareness Charter School (CAMPA CS) will work tirelessly to ensure that our students will be in a serious, nurturing environment that will foster academic success and promote character development. We expect that all of our students will not only leave CAMPA CS with a command of the skills necessary to perform at a high level in college but will also develop the social tools required to thrive in our ever-changing global society.</i>
Key Design Elements	<ul style="list-style-type: none"> • High School Level Mathematics in Middle School. • Personal Awareness and Wellness. • More instructional time. • Peer tutoring provided by high school students.

¹ Twenty-three percent of all students residing in this district attend charter schools. As the total enrollment of resident students attending charter schools in this district is greater than 5 percent of the total public school enrollment, pursuant to Education Law Section 2852(2)(d), NYSED notes that granting this renewal application provides a significant educational benefit to the students attending and expected to attend this charter school.

	<ul style="list-style-type: none"> Partnerships to integrate SEL and Wellness Initiatives designed to Support Student Achievement. Organizational Structure and Capacity designed to maximize support for teachers.
Recommended Material Revisions	<ul style="list-style-type: none"> To approve a contract between the school and the Center for Educational Innovation (CEI), whose proposed relationship meets NYSED’s criteria for an entity that provides comprehensive management services. To decrease its currently authorized enrollment of 375 students to 120 students phased in over the school’s proposed charter term.
Link to Charter School Renewal Report	http://www.p12.nysed.gov/psc/csdirectory/CollegiateAcademyforMathematicsandPersonalAwarenessCharterSchool/CAMPARENRP2021.pdf

Collegiate Academy for Mathematics and Personal Awareness Charter School (CAMPAC CS) is meeting two out of the 10 benchmarks set forth in the Board of Regents’ Charter School Performance Framework. Responding to these deficiencies, the school has implemented significant whole school turnaround efforts, including a new board chair, a new school/academic leader, and a new operations leader. To further implement and support these school turnaround efforts, the school proposes to contract with CEI, whose services include, but are not limited to, board governance, academic, operational, fiscal, and enrollment supports.

The school was required by NYSED to provide a corrective action plan (CAP) establishing strategies and measurable outcomes to improve academic, fiscal and enrollment deficiencies. The CAPs are being closely monitored, and NYSED will report to the Regents as necessary. The school is currently implementing the strategies outlined in the CAP and provides quarterly progress reports and updates to NYSED’s Charter School Office (CSO) around specific measurable metrics to ensure the school meets the majority of Performance Framework Standards by the school’s next renewal. Failure to demonstrate significant improvement, as evidenced by the school meeting the majority of Performance Framework standards by the conclusion of the school’s next proposed renewal term, may result in NYSED recommending nonrenewal at that time.

Charter School Performance Framework Benchmark Ratings
Collegiate Academy for Mathematics and Personal Awareness Charter School

2015 Performance Benchmark		Level
Educational Success	Benchmark 1: Student Performance: The school has met or exceeded achievement indicators for academic trends toward proficiency, proficiency and high school graduation. At all grade levels and all assessments, scoring proficiently means achieving a performance level of 3 or higher (high school Regents and Common Core Regents exam score of 65 or higher).	Approaches
	Benchmark 2: Teaching and Learning: School leaders have systems in place designed to cultivate shared accountability and high expectations and that lead to students' well-being, improved academic outcomes, and educational success. The school has rigorous and coherent curriculum and assessments that are aligned to the New York State Learning Standards (NYSLS) for all students. Teachers engage in strategic practices and decision-making in order to address the gap between what students know and need to learn so that all students experience consistent high levels of engagement, thinking and achievement.	Meets
	Benchmark 3: Culture, Climate, and Family Engagement: The school has systems in place to support students' social and emotional health and to provide for a safe and respectful learning environment. Families, community members and school staff work together to share in the responsibility for student academic progress and social-emotional growth and well-being. Families and students are satisfied with the school's academics and the overall leadership and management of the school.	Meets
Organizational Soundness	Benchmark 4: Financial Condition: The school is in sound and stable financial condition as evidenced by performance on key financial indicators.	Approaches
	Benchmark 5: Financial Management: The school operates in a fiscally sound manner with realistic budgets pursuant to a long-range financial plan, appropriate internal controls and procedures, and in accordance with state law and generally accepted accounting practices.	Approaches
	Benchmark 6: Board Oversight and Governance: The board of trustees provides competent stewardship and oversight of the school while maintaining policies, establishing performance goals, and implementing systems to ensure academic success, organizational viability, board effectiveness and faithfulness to the terms of its charter.	Approaches
	Benchmark 7: Organizational Capacity: The school has established a well-functioning organizational structure, clearly delineated roles for staff, management, and board members. The school has systems and protocols that allow for the successful implementation, evaluation, and improvement of its academic program and operations.	Approaches
Faithfulness to Charter & Law	Benchmark 8: Mission and Key Design Elements: The school is faithful to its mission and has implemented the key design elements included in its charter.	Approaches
	Benchmark 9: Enrollment, Recruitment, and Retention: The school is meeting or making annual progress toward meeting the enrollment plan outlined in its charter and its enrollment and retention targets for students with disabilities, English language learners, and students who are eligible applicants for the free and reduced priced lunch program; or has demonstrated that it has made extensive good faith efforts to attract, recruit, and retain such students.	Approaches
	Benchmark 10: Legal Compliance: The school complies with applicable laws, regulations, and the provisions of its charter.	Approaches

Innovative and Noteworthy Programs: CAMPA CS serves Grades 6-8. Grade 8 students outperformed the State in the percentage of students passing the Algebra I (93 percent) and U.S. History and Government Regents (100 percent) in the 2018-2019 school year. Seventy-seven percent of CAMPA CS

Grade 8 students scored proficient on the Living Environment Regents exam in the 2018-2019 school year. Overall, 67 percent of the 2019 graduating Grade 8 class passed at least one Regents exam.

Renewal Conditions:

- Demonstrate significant improvements in board governance, academic, operational, fiscal, and enrollment domains, as evidenced by the school meeting the majority of Performance Framework standards by the conclusion of the school’s next proposed renewal term.
- Work with the school’s comprehensive management provider to develop sustainable systems and processes, subject to NYSED approval, to address the academic, fiscal, organizational, and legal concerns identified by NYSED’s CSO throughout the charter term, as outlined in this Item, such that no additional academic, fiscal, organizational, or legal deficiencies are identified during the school’s next proposed charter term.
- Devise and implement a corrective action plan, subject to NYSED approval, to ensure the school’s enrollment is within 85 percent of the school’s annual authorized enrollment in each year of the proposed charter term at all times during the academic year.
- Devise and implement a weighted lottery policy, subject to NYSED approval, for English language learners (ELL) and economically disadvantaged (ED) students, for implementation no later than the 2021-2022 school year.
- Develop and implement a multi-step comprehensive process compliant with all State requirements to ensure that all school employees have fingerprint clearance prior to their start date at the school and that the records CAMPA CS maintains accurately reflect those clearances. CAMPA CS will submit such school board approved policy, including the identification and training of applicable staff members, to NYSED’s CSO for review and approval no later than May 30, 2021 (the school’s current charter term).
- The school must administer the interim/local assessments detailed in the school's charter, and/or other interim and/or summative assessments approved by NYSED’s CSO, to evaluate students' academic achievement, progress, and growth, as set forth in [NYSED’s Charter School Local Assessment Plan Policy](http://www.p12.nysed.gov/psc/aboutcharterschools/lawsandregs/documents/BoRAuthorizedCharterSchoolLocalAssessmentReportingMemoApril2020_FINAL.pdf) (http://www.p12.nysed.gov/psc/aboutcharterschools/lawsandregs/documents/BoRAuthorizedCharterSchoolLocalAssessmentReportingMemoApril2020_FINAL.pdf).

Table 1: Current Grade Levels and Authorized Enrollment

	Year 1 2016 to 2017	Year 2 2017 to 2018	Year 3 2018 to 2019	Year 4 2019-2020	Year 5 2020 to 2021
Grade Configuration	Grade 6	Grades 6-7	Grades 6-8	Grades 6-8	Grades 6-8
Total Authorized Enrollment	125	250	375	375	375

Table 2: Proposed Renewal Term Grade Levels and Proposed Enrollment

	Year 1 2021 to 2022	Year 2 2022 to 2023
Grade Configuration	Grades 6-8	Grades 6-8
Total Proposed Enrollment	110	120

Summary of Evidence for Renewal

Key Performance Area: Educational Success

Student Performance – Middle School Outcomes

See Figure 1 regarding assessment proficiency regarding 3-8 math and ELA. See Table 1 below regarding 3-8 math and ELA exam aggregate and subgroup student performance compared to the district and State average, which are two of the many indicators in Benchmark One of the Charter School Performance Framework. **According to the 2020-2021 school year ESEA accountability designations, CAMPA CS is in Good Standing.**

Academic Program for Middle School:

- CAMPA CS's academic program focuses on balanced literacy and critical thinking in ELA, application and problem-solving in math, and project-based learning in science and social studies.
- The school's course sequence and Saturday Academy academic support prepare students to take Regents exams in Algebra I, Living Environment, and US History and Government.
- The remote learning schedule, implemented during the pandemic, provides synchronous in-person learning Monday through Thursday with five 45-minute classes, daily recitation, and end-of-day office hours. On Fridays, students have opportunities for individual and small group remediation, assignment completion, and lesson previewing for the following week.

Academic Program for Students with Disabilities (SWDs) and English Language Learners (ELLs):

- CAMPA CS employs a special education coordinator who provides push-in and pull-out special education teacher support services. The school also offers an Integrated Co-Teaching class at each grade level.
- CAMPA CS works with the New York City Department of Education (NYCDOE) to provide speech and occupational therapy services.
- CAMPA CS employs a Spanish/ENL teacher who incorporates language literacy strategies during Spanish class and provides direct ELL support during Saturday recitation. The introduction of this Saturday recitation serves as supplemental support and does not replace the use of the pull-out time during the weekday.

Figure 1: Elementary/Middle School Assessment Proficiency State and District Differentials Over Time Comparison to NYC CSD 19

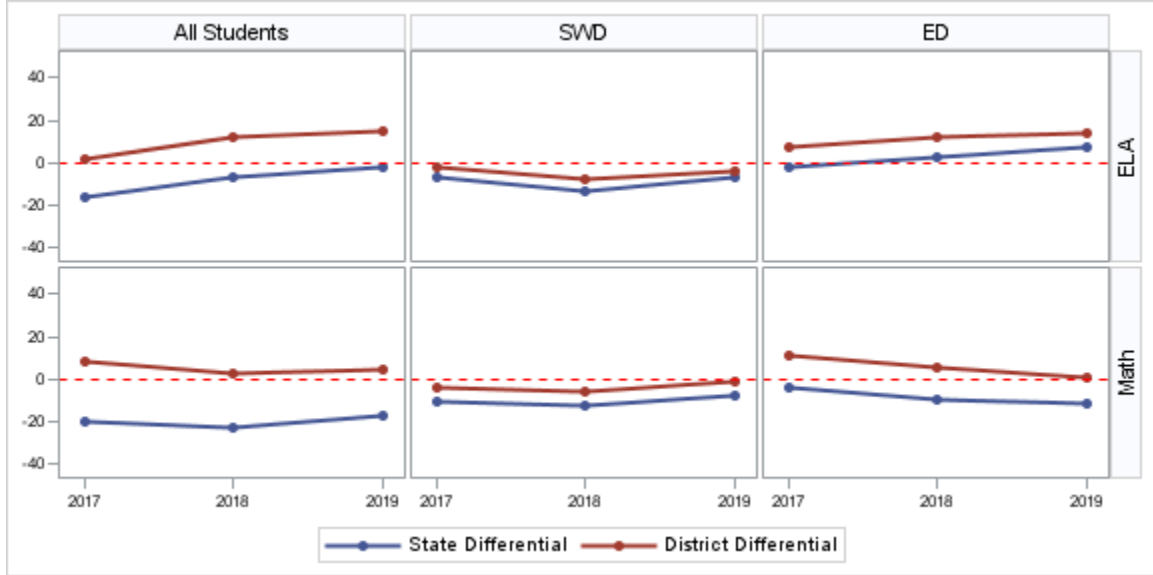


Table 1: Elementary/Middle School Assessment Proficiency Outcomes: Charter School, District & NYS

		ELA					Math				
		Collegiate Academy for Mathematics and Personal Awareness CS	NYC CSD 19	Differential to District	NYS	Differential to NYS	Collegiate Academy for Mathematics and Personal Awareness CS	NYC CSD 19	Differential to District	NYS	Differential to NYS
All Students	2016-2017	16%	14%	+2	32%	-16	20%	12%	+8	40%	-20
	2017-2018	38%	26%	+12	45%	-7	20%	17%	+3	43%	-23
	2018-2019	43%	28%	+15	45%	-2	25%	21%	+4	42%	-17
SWD	2016-2017	0%	2%	-2	7%	-7	0%	4%	-4	11%	-11
	2017-2018	0%	8%	-8	14%	-14	0%	6%	-6	13%	-13
	2018-2019	6%	10%	-4	13%	-7	5%	6%	-1	13%	-8
ED	2016-2017	21%	14%	+7	23%	-2	24%	13%	+11	28%	-4
	2017-2018	38%	26%	+12	35%	+3	21%	16%	+5	31%	-10
	2018-2019	42%	28%	+14	35%	+7	21%	20%	+1	33%	-12

Key Performance Area: Organizational Soundness

Financial Condition

NYSED monitors the school's compliance with Benchmark 4 of the Charter School Performance Framework, which includes its near- and long-term financial condition. Unless otherwise indicated, financial data is derived from the school's annual independently audited financial statements, which are publicly available on [NYSED's website](http://www.p12.nysed.gov/psc/csdirectory/CSLaunchPage.html) (<http://www.p12.nysed.gov/psc/csdirectory/CSLaunchPage.html>).

A financial composite score is an overall measure of financial health based on a weighting of primary reserves, equity, and net income. A charter school with a score between 1.5 and 3.0 is generally considered to be in good financial health. The CAMPA CS's Board of Trustees reports that the school is no longer running a deficit as of the 2020-2021 school year. CAMPA CS's 2019-2020 composite score is 1.62.

**Table 2: Composite Scores
2016-2017 to 2019-2020**

<i>Year</i>	<i>Composite Score</i>
2016-2017	1.58
2017-2018	.14
2018-2019	.01
2019-2020	1.62

Financial Management

NYSED's CSO reviewed CAMPA CS's 2019-2020 audited financial statements to determine whether the independent auditor observed sufficient internal controls over financial reporting. The auditor did not identify or find deficiencies in internal controls that could be considered material weaknesses. The board worked to ensure that its internal controls are implemented and followed, including putting into place a new financial management system and bill paying software (which the education services provider and outside financial consultant at Charter School Business Management will monitor). This work has placed the school in better financial position as of the 2019-2020 school year and thereafter.

NYSED's CSO also reviewed CAMPA CS's 2018-2019 audited financial statements, the most recently available at the time of the renewal site visit, to determine whether the independent auditor observed sufficient internal controls over financial reporting and the absence of a going concern disclosure. The auditor identified the going concern and significant deficiency outlined below which the school has subsequently worked to correct and address:

- **Prior Substantial Doubt about CAMPA CS's Ability to Continue as a Going Concern:**
CAMPA CS suffered recurring operating losses of approximately \$108,000 during the year ended June 30, 2018 and approximately \$67,000 during the year ended June 30, 2019. In addition, current liabilities exceeded current assets by approximately \$120,000 as of June 30, 2018 and \$270,000 as of June 30, 2019. To address this issue, CAMPA CS has implemented cost cutting strategies to reduce expenses and maintain financial stability while preserving a high level of academic instruction to its students. These cost cutting strategies have included reduction in

cost from outside professional services, reduction in staff, and close monitoring of weekly cash flow.

- **Prior Significant Deficiency Related to Bank Reconciliations:**
CAMP A CS had engaged a fiscal consultant to perform bank reconciliations on a quarterly basis. Upon NYSED recommendation, CAMP A has consultants perform bank reconciliations on a monthly basis. The board chair and Finance Committee reviews the reconciliations to ensure the task is done in a timely fashion. The CAMP A CS's Board of Trustee's Finance Committee meets monthly to review financial statements prepared via the new financial management system and reports out to the full board at its monthly public BOT meetings. A part-time business manager has been hired to work with the School Leadership Team and director of operations to ensure all policies and procedures are adhered to and ensure that all instructional supplies, equipment, and text books are purchased and available to all staff and students in a timely manner. In addition, the business manager will continue to monitor the continued implementation of a CAP with the principal, director of operations, and educational service providers with oversight from the Board Finance Committee.

Key Performance Area: Faithfulness to the Charter and Law

Enrollment, Recruitment, and Retention

Through efforts toward increasing the percentage of at-risk students enrolled, CAMP A CS has enrolled a comparable number of SWDs with its district of location, NYC CSD 19 (differentials of 0 in 2016-2017, 0 in 2017-2018, -2 percentage points in 2018-2019, and -3 percentage points in 2019-2020). (See Table 3 below).

However, CAMP A CS has been below 85 percent of initial maximized authorized enrollment throughout this charter term, including 46 percent in 2016-2017 (enrolled 58 students of authorized 125), 26 percent in 2017-2018 (enrolled 66 students of authorized 250), and 35 percent in 2018-2019 (enrolled 109 of authorized 315).² In recent years, the CSO reduced authorized enrollment to 100, given the school's challenges in meeting anticipated enrollment levels and facility concerns.

Across the 2016-2017 through 2019-2020 school years, CAMP A CS did not enroll a comparable number of ELLs (-19 percentage points in 2019-2020) and educationally disadvantaged (ED) students (-20 percentage points in 2019-2020) with NYC CSD 19. The 2019-2020 annual report and renewal application narrative describe multiple recruitment efforts, which include:

- Hosting monthly open houses.

² Education Law §2854(2)(a) requires that schools demonstrate good faith efforts to attract and retain a comparable or greater enrollment of students with disabilities, FRPL-eligible students and English language learners when compared to the enrollment figures for such students in the school district in which the charter is located. SUNY and the Regents were charged with setting specific enrollment and retention targets for each charter school and have done so (Education Law §2852(9-a)(b)(i)). All charter schools that were initially chartered after August 2010 or renewed after January 1, 2011 are expected to meet or exceed the enrollment and retention targets set by the Regents and SUNY. When submitting an application for renewal of the charter, schools are required to provide information detailing the means by which they will meet the enrollment and retention targets (Education Law §2851(4)(e)), and this information is considered by the Regents in the review of the school's performance over the charter term. A school's plan to change its enrollment practices, whether by weighting the lottery or preferencing, may also be considered when determining whether the school will meet the targets in the upcoming charter term. A school's repeated failure to meet or exceed its enrollment and retention targets, when combined with a failure to show that extensive efforts to meet the targets have been made, may be cause for termination or revocation of the charter, pursuant to Section Education Law §2855(1)(e).

- Forming relationships with area elementary school counselors, community-based organizations, tenant associations and homeless shelter/service providers.
- Holding public meetings at local recreation centers.
- Publicizing flyers and articles in printed newspapers and advertisements.
- Implementing a marketing campaign, using both social and traditional media, as well as working with former NYC CSD 19 principals to assist with recruitment.

Table 3: Subgroup Enrollment: Students with Disabilities, ELLs, and Economically Disadvantaged

	SWD			ELL			ED		
	Collegiate Academy for Mathematics And Personal Awareness CS	NYC CSD 19	Differential to District	Collegiate Academy for Mathematics And Personal Awareness CS	NYC CSD 19	Differential to District	Collegiate Academy for Mathematics And Personal Awareness CS	NYC CSD 19	Differential to District
2016-2017	26%	26%	0	7%	14%	-7	69%	92%	-23
2017-2018	26%	26%	0	5%	17%	-12	80%	93%	-13
2018-2019	23%	25%	-2	4%	18%	-14	75%	92%	-17
2019-2020	22%	25%	-3	0%	19%	-19	73%	93%	-20

Table 4: Aggregate and Subgroup Retention

	All Students			SWD			ELL			ED		
	Collegiate Academy for Mathematics and Personal Awareness CS	NYC CSD 19	Differential to District	Collegiate Academy for Mathematics and Personal Awareness CS	NYC CSD 19	Differential to District	Collegiate Academy for Mathematics and Personal Awareness CS	NYC CSD 19	Differential to District	Collegiate Academy for Mathematics and Personal Awareness CS	NYC CSD 19	Differential to District
2017-2018	72%	89%	-17	80%	86%	-6	75%	85%	-10	75%	88%	-13
2018-2019	82%	88%	-6	76%	86%	-10	67%	87%	-20	81%	88%	-7
2019-2020	82%	89%	-7	91%	89%	+2	100%	89%	+11	84%	90%	-6

Table 5: Aggregate Enrollment: Reported vs Contracted – Target = 100%

Collegiate Academy for Mathematics and Personal Awareness CS	Contracted Enrollment	Reported Enrollment	Percent of Contracted Enrollment
2016-2017	125	58	46%
2017-2018	250	66	26%
2018-2019	375	109	29%
2019-2020	375	86	23%

Legal Compliance

CAMPA CS has lacked compliance with applicable laws related to financial management and oversight during the charter term. The November 2017 and December 2019 NoDs and a February 2020 Office of Audit Services report outlined financial compliance issues concerning purchasing, documentation, escrow funds, and internal controls.

- The school was required to repay certain grant funds and owed NYCDOE in excess of \$130,000. The school has repaid all amounts owed.
- The school has been under-enrolled throughout the charter term.
- The school had been consistently tardy in submitting required documents to SED, including annual report documents and audited financial statements.
- The school has conducted board business without a quorum of members present at the meeting.
- The school has exceeded the legal number of uncertified teachers.

CAMPA CS requested a material revision to revise its enrollment consistent with its actual historically low enrollment and capacity of its current facility. Via a Memorandum of Understanding with CEI (prior to the school’s material revision request to execute a formal partnership with this comprehensive

educational service provider), CAMPA CS's Board of Trustees began working with CEI to address concerns identified in NYSED's CSO-issued CAP, including:

- monitoring the implementation of internal controls and putting into place a new financial management system and bill paying software.
- implementing professional development for the Board of Trustees.
- reviewing and updating all board/school policies and legal documents to ensure compliance with all legal and regulatory requirements.
- undertaking measures to ensure compliance with fingerprinting and clearance requirements, which now includes a multi-step, comprehensive process whereby all school employees have fingerprint clearance prior to their start date at the school.

Summary of Public Comment

NYCDOE held the required public hearing on October 29, 2020. Seventy-two members of the public attended; 35 of whom spoke in favor of the proposed renewal and revisions. No one spoke in opposition to the proposed renewal or revisions.

APPENDIX

Laws, Regulations, and Regents-endorsed internal policies Applicable to Board of Regents-authorized Charter School Renewals

Statutory requirements pertaining to Board of Regents charter school decision making are enumerated in Article 56 of the Education Law. This section of the law sets forth the purpose of charter schools to:

- (a) Improve student learning and achievement;
- (b) Increase learning opportunities for all students, with special emphasis on expanded learning experiences for students who are at-risk of academic failure;
- (c) Encourage the use of different and innovative teaching methods;
- (d) Create new professional opportunities for teachers, school administrators and other school personnel;
- (e) Provide parents and students with expanded choices in the types of educational opportunities that are available within the public school system; and
- (f) Provide schools with a method to change from rule-based to performance-based accountability systems by holding the schools established under this article accountable for meeting measurable student achievement results.

Criteria regarding the evaluation of charter schools, including for renewal decisions, are set forth in Section 2852(2) of the Education Law:

- (a) Does the charter school described in the application meet the requirements set out in applicable laws, rules and regulations;
- (b) Does the charter school demonstrate the ability to operate the school in an educationally and fiscally sound manner;
- (c) Will approving the charter school action make it likely to improve student learning and achievement and materially further the purposes of the law; and
- (d) In a school district where the total enrollment of resident students attending charter schools in the base year is greater than 5 percent of the total public school enrollment of the school district in the base year (i) would granting the application have a significant educational benefit to the students expected to attend the proposed charter school or (ii) did the school district in which the charter school will be located consents to such application.

In addition, Renewal Guidelines contained in the Regulations of the Commissioner of Education (8 NYCRR 119.7(d)) were adopted by the Board of Regents and require that the Board further consider the following when evaluating a charter renewal application:

- (a) The information in the charter school's renewal application;
- (b) Any additional material or information submitted by the charter school;
- (c) Any public comments received;
- (d) Any information relating to the site visit and the site visit report;
- (e) The charter school's annual reporting results including, but not limited to, student academic achievement;
- (f) The Department's renewal recommendation and the charter school's written response, if any; and

- (g) Any other information that the board, in its discretion, may deem relevant to its determination whether the charter should be renewed.

[The Board of Regents Renewal Policy](https://www.regents.nysed.gov/common/regents/files/documents/meetings/2012Meetings/November2012/1112p12a1.pdf) (<https://www.regents.nysed.gov/common/regents/files/documents/meetings/2012Meetings/November2012/1112p12a1.pdf>) sets forth the following renewal options and standards upon which the Department's recommendation is based:

Full-Term Renewal: A school's charter may be renewed for the maximum term of five years. In order for a school to be eligible for a full-term renewal, the school must have compiled a strong and compelling record of meeting or exceeding Benchmark 1 during the current charter term and, at the time of the renewal analysis, have met substantially all of the other performance benchmarks in the Framework.

Short-Term Renewal: A school's charter may be renewed for a shorter term, typically of three years. The Regents will place an even greater emphasis on student performance for schools applying for their second or subsequent renewal, which is consistent with the greater time that a school has been in operation and the corresponding increase in the quantity and quality of student achievement data that the school has generated. In order for a school to be eligible for short-term renewal, a school must either: (a) have compiled a mixed or limited record of meeting Benchmark 1 but, at the time of the renewal analysis, have met substantially all of the other performance benchmarks in the Framework, which will likely result in the school's being able to meet Benchmark 1 with the additional time that short-term renewal permits, or (b) have compiled an overall record of meeting Benchmark 1 but falls far below meeting one or more of the other performance benchmarks in the Framework.

Nonrenewal: A school's charter will not be renewed if the school does not apply for renewal or the school fails to meet the benchmark standards for either full-term or short-term renewal. In the case of nonrenewal, a school's charter will be terminated upon its expiration, and the school will be required to comply with [the Department's Closing Procedures](http://www.p12.nysed.gov/psc/regentsoversightplan/sectioni-iv/ClosingProceduresChecklist0220.pdf) (<http://www.p12.nysed.gov/psc/regentsoversightplan/sectioni-iv/ClosingProceduresChecklist0220.pdf>) to ensure an orderly closure by the end of the school year.

To operationalize these statutory and regulatory requirements, the Board of Regents endorsed the Charter School Performance Framework. This document, and the ten academic, organizational, and legal domains contained within it, were created based on the limited criteria that can be considered when making decisions pertaining to the authorization of new charter schools, charter school renewals, and charter school revisions as set forth in Section 2852(2) of the Education Law. Comprehensive data for these benchmark standards is included in the charter school Regents item, summary documents, and Regents meeting presentations.

Performance Framework

The Board of Regents Charter School Performance Framework, which is part of the Board of Regents Charter School Renewal Policy and the Oversight Plan included in the Charter Agreement for each school, outlines three key areas of charter school performance: (1) Educational Success; (2) Organizational Soundness; and (3) Faithfulness to Charter and Law. The Charter School Performance Framework sets forth ten performance benchmarks in these three areas. The Charter School Performance Framework is designed to focus on performance outcomes, preserve operational autonomy, and facilitate transparent feedback to schools. It aligns with the Department's ongoing

accountability and effectiveness work under the Every Student Succeeds Act (ESSA) and holds charter schools accountable to standards set forth in the Education Law, while providing the Regents with discretion. Generally, charter schools are required to demonstrate performance outcomes that exceed those of traditional public schools.

The Department considers evidence related to all ten performance benchmark areas of the Charter School Performance Framework when making recommendations to the Regents concerning charter renewal applications. However, student academic performance is of paramount importance when evaluating each school (See [§ 8 NYCRR 119.7](http://www.p12.nysed.gov/psc/aboutcharterschools/Financing/Regulations/csreg119.7.html) (<http://www.p12.nysed.gov/psc/aboutcharterschools/Financing/Regulations/csreg119.7.html>)). The recommendations in this document were made after a full due-diligence process over the charter term as set forth in [the NYSED Charter School Monitoring Plan](http://www.p12.nysed.gov/psc/regentsoversightplan/SectionIIMonitoringPlan.html) (<http://www.p12.nysed.gov/psc/regentsoversightplan/SectionIIMonitoringPlan.html>), including review of the information presented by the schools in their Renewal Applications; specific fiscal reviews; a renewal site visit of up to two days conducted by a Department team for each school; comprehensive analysis of achievement data; and consideration of public comment.