



The Newport Board of Education held a special meeting on December 26, 2019 at 5:00 P.M. The meeting was held in the A.D. Owens Professional Development room located at 30 W. 8th Street, Newport, KY.
PURPOSE: Decision on the River Cities Academy Application.

CALL TO ORDER

Chairman Malone called the meeting to order and asked for a roll call. The following were present: Ramona Malone, Dr. Julie Smith-Morrow, Melissa Sheffel, Theresa Miller, and Sylvia Covington.

Also, in attendance: Kelly Middleton, Superintendent, district administrators, and guests.

OPENING

Ms. Malone welcomed everyone and then explained the purpose of the tonight's meeting. "The River Cities Academy Charter School Application was received on October 30, 2019. In compliance with KRS 160.1594(3)(a), a comprehensive review of the River Cities Academy Charter School application was conducted from November 25, 2019 through December 20, 2019. The team used the rigorous criteria outlined in the rubric attached. Additional due diligence was conducted, and findings are included as part of this recommendation. The applicant was provided a list of deficiencies via email and provided 10 days to provide amendments in compliance with KRS 160.1594(3)(e)".

"In compliance with KRS 160.1594(3)(b), the Newport Independent Board of Education conducted a capacity interview of the applicant on December 17, 2019. The interview consisted of a performance task and questioning. The information gleaned was utilized to more fully assess the specific competencies not fully ascertained from resumes or the written application".

"In compliance with KRS 160.1494(3)(c), a Public Forum was held on December 18, 2019. In addition, the Board posted the River Cities Academy application and invited public comment via Google Form linked to the district webpage".

At this time Ms. Malone asked Superintendent Middleton to present the findings of the team who analyzed the application. A copy of the report is referenced and made part of the minutes.

At the conclusion of the presentation the Board Chair advised that the Board takes its responsibility as an authorizer very seriously. The Board realizes that its review of the application must be based in evidence, objective, and clear.

"KRS 160.1594 requires the authorizer adopt approvals and denials by resolution during an open meeting".

BOARD DISCUSSION

At this time, Ms. Malone asked the board if they had any questions regarding any of the information received from Mr. Middleton. There were none. Ms. Malone proceeded to entertain a motion a Motion regarding the Charter School Application.

On MOTION BY SMITH-MORROW AND SECONDED BY SHEFFEL it was moved that the Board adopt the adopt the recommendation and all corresponding materials including the rubric and all attachments regarding the RCA charter school application and deny the RCA charter school application.

Roll Call – Ramona Malone, yes – Dr. Julie Smith-Morrow, yes – Melissa Sheffel, yes – Theresa Miller, yes, and Sylvia Covington, yes

1044 - MOTION CARRIED 5-0

Ms. Malone then read the following resolution:

WHEREAS, in 2017, the Kentucky General Assembly passed a statutory framework authorizing charter schools in Kentucky

AND WHEREAS, KRS 160.1594, in part, provides that, "The authorizer shall adopt by resolution all charter approval or denial decisions in an open meeting of the authorizer's board of directors."

AND WHEREAS, at its December 26, 2019 Board Meeting, the Newport Independent Schools Board of Education considered one (1) charter school application;

AND WHEREAS, the Newport Independent Schools Board of Education at its December 26, 2019 Board Meeting voted to deny one (1) charter application;

AND WHEREAS, the Newport Independent Schools Board of Education adopted the grounds given by the application reviewers for denying the charter school application, which basis are attached hereto;

AND WHEREAS, upon receipt of the grounds for denial, the applicant has thirty (30) days within which to submit an appeal to the Kentucky Department of Education;

AND WHEREAS, the Newport Independent Schools Board of Education will within five (5) days of its decision, provide this resolution and the accompanying materials to the applicant and the Kentucky Department of Education.

NOW THEREFORE BE IT RESOLVED BY THE NEWPORT INDEPENDENT SCHOOLS BOARD OF EDUCATION THAT,

The Newport Independent Schools Board of Education has denied the River Cities Academy Charter School application submitted by Lynn Schaber and Evelyn Pence.

On this 26th day of December 2019.

On MOTION BY SMITH-MORROW AND SECONDED BY SHEFFEL the board voted to adopt the resolution as presented..

1045 – MOTION CARRIED 5-0

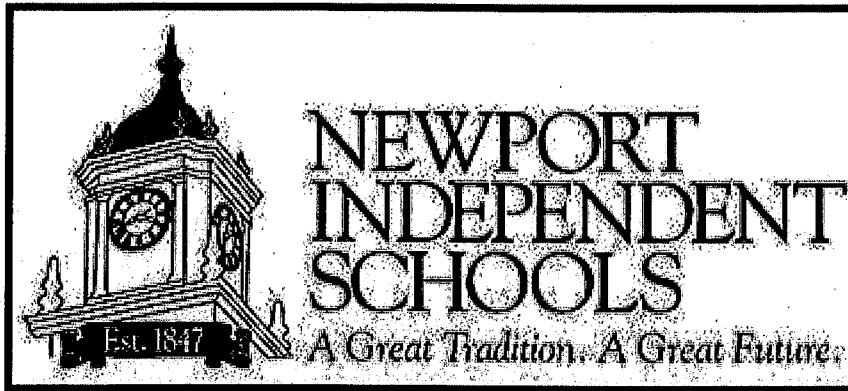
ADJOURNMENT

There being no further business, on MOTION BY SMITH-MORROW AND SECONDED BY SHEFFEL the meeting adjourned. Time: 5:39 PM

1046- MOTION CARRIED 5-0

Chairman

Secretary



Newport Independent Schools - Board of Education

CHARTER SCHOOL RECOMMENDATION REPORT

New Charter School Application for
River Cities Academy

Submitted by
Lynn Schaber, Lead
Evelyn Pence, Co-Lead

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This Charter School Recommendation Report is a summary of the multitude of evidence collected and analyzed for the purpose of evaluation of a submitted charter school application and also includes a recommendation to the Board by the application reviewers.

The Board, as authorizer, makes all final decisions regarding a charter school application. The recommendation provided here is nonbinding on the Board.

EVALUATION PROCESS (KRS 160.1594(3)(a),(d)(f))

The River Cities Academy Charter School Application was received on October 30, 2019. A comprehensive review of the River Cities Academy Charter School application was conducted from November 25, 2019 through December 20, 2019. The team used the rigorous criteria outlined in the rubric attached.

Additional due diligence was conducted and findings are included as part of this recommendation.

CALL FOR CLARIFICATION (KRS 160.1594(3)(e))

On December 6, 2019, the Newport Independent Board of Education, through Superintendent Kelly Middleton, communicated with RCA regarding several deficiencies, as defined in the attached rubric, to which RCA was given ten (10) days to respond. A response was provided by RCA on December 9, 2019, and incorporated into the review.

CAPACITY INTERVIEW (KRS 160.1594(3)(b))

The Newport Independent Board of Education conducted a capacity interview of the applicant on December 17, 2019. The interview consisted of a performance task and questioning. The information gleaned was utilized to more fully assess the specific competencies not fully

ascertained from resumes or the written application.

PUBLIC COMMENT (KRS 160.1594(3)(c))

A Public Forum was held on December 18, 2019. In addition, the Board posted the River Cities Academy application and invited public comment via Google Form linked to the District webpage.

FINAL RECOMMENDATION (KRS 160.1594(3)(f))

The Newport Independent Board of Education was provided this preliminary recommendation on December 23, 2019 and took action on the application December 26, 2019.

APPLICATION REVIEWERS

The Newport Independent Board of Education took action on December 4, 2019 to authorize Superintendent Kelly Middleton to compile a team of application reviewers and hire education consultants to assist in the review of the RCA application. In an effort to mitigate concerns about bias in the review process, the hired reviewers were from outside the Northern Kentucky region and included strong documented experience in education leadership, special populations, program evaluation, compliance with state and federal law, and charter school authorizing processes. The list of reviewers is included below.

REPORT SUMMARY

This evaluation report includes the following:

School Summary

An overall summary of the information provided in the application with no analysis.

Recommendation

An overall judgement regarding whether the proposal meets the criteria for approval.

Proposal Overview by Section

Summary of Analysis section.

Analysis

Analysis of the proposal based on the provided responses to the Kentucky Charter Schools Application.

NOTE

Please note, the applicant did not meet the criteria for use of the Kentucky Application Addenda and therefore it was not incorporated in the final recommendation.

Summary of Public Comment

Overview of the public comment received through the Public Forum and through the written comment received through the Google Form posted on the District webpage.

Summary of Capacity Interview

Overview of the information gleaned through the capacity interview used to inform the capacity component of the application analysis.

Charter School Application Reviewers		
School Leadership/Law		
Bill Bradford	Assistant Superintendent	Ft. Thomas Independent Schools
Mike Borchers	Superintendent	Ludlow Independent Schools
Greg Duty	Superintendent	Southgate Independent Schools
School Finance		
Jay Brewer	Superintendent	Dayton Independent Schools
Rachel Ball	Federal Programs Coord.	Newport Independent Schools
Tete Turner	District Finance Officer	Newport Independent Schools
Trish Gosney	District Finance Officer	Dayton Independent Schools
Jennifer Pierce	District Finance Officer	Bellevue Independent Schools
Susan Bentele	Executive Dir. of Finance	Kenton County School District
Program Evaluation		
Stephen Lin	Specialist Research and Eval.	Jefferson County Public Schools
Diane Hatfield	Professional Learning Coord.	NKY Education Cooperative
Bill Grein	District Assessment Coord.	Covington Independent Schools
Ginger Blackwell	Director of Educational Pl.	Northern Kentucky University
Special Populations		
Kim Chevalier	Chief of Exceptional Child Ed.	Jefferson County Public Schools
Lisa Swanson	Director of Special Education	Newport Independent Schools
Marinell Kephart	Director of Special Education	Campbell County Schools
Esther Brady	Director of Special Education	Covington Independent Schools
Becky Nixon	Regional Director of Sp. Ed.	NKY Education Cooperative
Laura Clarke	Special Education Consultant	NKY Education Cooperative

Educational Programs		
Robb Smith	Superintendent	Bellevue Independent Schools
Carla Davis	Director of Curriculum and Inst.	Newport Independent Schools
Matt Engel	Supervisor of Curriculum	Erlanger-Elsmere Schools
Shawna Harney	Chief Academic Officer	Kenton County School District
Scott Alter	Assistant Superintendent	Covington Independent Schools
Operations		
Tim Grayson	Director of Facilities and Transp	Newport Independent Schools
Brian Vanover	Chief Operating Officer	Beechwood Independent Schools
Lisa Rizzo	Food Service Director	Newport Independent Schools
Rusty Adams	Director of Instructional Technology	Newport Independent Schools
Ron Kinmon	Director of Student Services	Dayton Independent Schools
Review Team Leads		
Cassie R. Blausey	E.A. of School Choice	Jefferson County Public Schools
Amy Gilkison	Assistant Superintendent	Newport Independent Schools

MISSION

The mission of River Cities Academy is: to realize the full potential of young minds through experiential learning with high expectations for excellence in academics and character

VISION

The RCA vision is to embody the following academic model:

- A public, not-for-profit, K-8, northern Kentucky (NKY) urban community charter school with a diverse learner population. Year 1 will be comprised of K-5 and we will add a grade each year until reaching 8th Grade;
- A partner that co-exists in a complementary manner with the other public education institutions; and,
- A student-centered, high expectations school that uses a different approach to learning.

EDUCATIONAL PROGRAM FEATURES

The applicant focuses on the case-based learning method¹, which it states is defined as “an established approach used across discipline where students apply their knowledge to real-world scenarios, promoting higher levels of cognition.”

GOALS

As provided on pages 181-182 in the application:

English Language Arts

By the end of year 2, all students in grade 3 and higher who have been attending RCA for 12 or more months will increase reading/early literacy and writing performance by 10% in Growth as assessed by aimswebPlus. It will be administered 3 times per year, and our 2-year progress will be measured by comparing the first test with the last test in the students' second year.

By the end of year 3, all students in grade 3 and higher who have been attending RCA for 12 or more months will increase reading/early literacy and writing performance by 20% in growth as assessed by aimswebPlus.

Math

¹ <https://poorvucenter.yale.edu/faculty-resources/strategies-teaching/case-based-learning>

- By the end of year 2, all students in grade 3 and higher who have been attending RCA for 12 or more months will increase mathematics/early numeration performance by 10% in growth as assessed by aimswebPlus. It will be administered 3 times per year, and our 2-year progress will be measured by comparing the first test with the last test in the students' second year.
- By the end of year 3, all students in grade 3 and higher who have been attending RCA for 12 or more months will increase in math/early numeration reading and writing performance by 20% in growth as assessed by aimswebPlus.

Other Academic / Performance

- By the end of year 2, all students in grades 3 and higher who have been attending RCA for 12 or more months will score at least equal to the weighted average 6 River Cities KPREP results for the region.
- By the end of Year 3, all students in grades 3 and higher who have been attending RCA for 12 or more months will score 5% higher than the weighted average 6 River Cities KPREP results for the region. Page 182 of 207, October 2019
- 85% of students enrolled on October 1 of the current year will re-enroll and be in attendance on October 1 of the following year. The Student Information System will be utilized as the measuring tool.
- The school will attain an average student daily attendance of 93% in the second year of operation. The Student Information System will be utilized as the measuring tool.
- Teacher attendance will be 90% or better and retention rate will be at least 70% annually.
- 80% of the teachers will strongly agree that the leaders are implementing the mission annually based upon a teacher survey.
- In an annual survey, 75% of families will agree or strongly agree in terms of the positive overall quality of the education at RCA

Charter School Recommendation Report 2019
River Cities Academy

FISCAL IMPACT

	(A)	(B)	(C)	(D)	(E)
Charter Year	Expected Number of Students	ADA (Public Funds) **AS PROJECTED BY APPLICANT	Federal and State Grants **AS PROJECTED BY APPLICANT	Other Proposed Revenue (Charter School Grants, Fundraising, etc.) **AS PROJECTED BY APPLICANT	Total Revenue
Year 1 (2018-19)	201	\$2,242,994	\$150,000	\$342,009	\$2,735,003
Year 5 (2023-24)	300	\$3,347,753	\$150,000	\$137,700	\$3,635,453

ENROLLMENT PROJECTIONS

Academic Year	Planned # Students	Projected ADA	Grades Served
2020-2021	201	190	K-5
2021-2022	200	189	K-6
2022-2023	240	226	K-7
2023-2024	279	264	K-8
2024-2025	300	284	K-8

OVERALL RECOMMENDATION

I. COVER SHEET AND ENROLLMENT PROJECTION	PARTIALLY COMPLETE
II. SCHOOL OVERVIEW	
III. EDUCATIONAL PROGRAM DESIGN AND CAPACITY	
IV. OPERATIONS PLAN AND CAPACITY	
V. FINANCIAL PLAN AND CAPACITY	
VI. CLOSURE AND DISSOLUTION	
VII. OPTIONAL INFORMATION	

APPLICATION REVIEW RECOMMENDATION

Application Review Standards

KRS 160.1594 provides the following standard for the charter school application review process:

"(4) In deciding to approve a charter application, the authorizer shall:

- (a) Grant charters only to applicants that possess competence in all elements of the application requirements identified in this section and KRS 160.1593;**
- (b) Base decisions on documented evidence collected through the application review process;**
- and**
- (c) Follow charter-granting policies and practices that are transparent, based on merit, and avoid conflicts of interest."**

Additionally, KRS 160.1594 later provides:

"(7) An application shall be approved if the public charter school authorizer finds that :

- (a) the public charter school described in the application meets the requirements established by this section and KRS 160.1590 and 160.1592;**
- (b) The applicant demonstrates the ability to operate the school in an educationally and fiscally sound manner; and**
- (c) Approving the application is likely to improve student learning and achievement and further the purposes established by KRS 160.1591."**

In compliance with KRS 160.1594, based on the information provided in the application, during the capacity interview, as part of the public comment and forum and for the reasons provided in the rubric as part of the detailed analysis of the River Cities Academy Charter School Application, this final recommendation document incorporates all evidence as provided in this packet as support for the recommendation presented to the Newport Board of Education.

Authorizer Statement of Compliance with KRS 160.1594

"(a) Grant charters only to applicants that possess competence in all elements of the application requirements identified in this section and KRS 160.1593;"

The applicant has not provided sufficient evidence to comply with this element of KRS 160.1593 in the following areas:

KRS 160.1593-(3)(a),(b),(c)(1)-(2), (d), (e), (f), (g), (h), (i), (j), (k), (m), (o), (p), (q), (s), (t), (u), (v), (w), (x), and (y)

The applicant has not provided sufficient evidence to prove competency to open and sustain a high quality charter school. See rubric for specific details.

"(b) Base decisions on documented evidence collected through the application review process;"

The authorizer has conducted a thorough review process that has included all elements of KRS 160.1594(3) and has documented evidence from each element of the application review in this recommendation and the accompanying rubric and materials.

“(c) Follow charter-granting policies and practices that are transparent, based on merit, and avoid conflicts of interest.”

The authorizer reviewed all application reviewers for potential conflicts of interest and bias. Each reviewer provided a statement of their ability to provide an impartial assessment of the merits of the application.

**“(7) An application shall be approved if the public charter school authorizer finds that :
(a) the public charter school described in the application meets the requirements established by this section and KRS 160.1590 and 160.1592;”**

KRS 160.1590(12) indicates that a public charter school is one that, in part, “(h) operates in pursuit of a specific set of educational objectives as defined in its charter contract.” This is one area of concern as outlined in the rubric review, as the applicant does not provide specificity as to its goals.

Issues with compliance in the following areas of KRS 160.1592 are noted in the rubric review and this final recommendation:

- KRS 160.1592(3)(b), (d), (f), (g), (h), (i), (j), (k), (l), (m), (n), (p), (q); (8); and (17)

“(b) The applicant demonstrates the ability to operate the school in an educationally and fiscally sound manner; ”

Capacity of the applicant is questioned throughout, especially as several of the documents provided in an effort to support evidence of capacity are somewhat, substantially, or entirely plagiarized.

“(c) Approving the application is likely to improve student learning and achievement and further the purposes established by KRS 160.1591.”

The applicant simply does not provide enough credible evidence to support the notion that the school is ready to launch and be viable and sustainable, much less improve student learning and achievement. Evidence to that end is highly speculative and relies on the applicant's word rather than documented research. Additionally, it is questionable as to whether or not the applicant's model, as outlined in the application, will support and improve student learning for ALL students, as proposed. There is a significant lack of clarity regarding the applicant's understanding and capacity to support systems and structures required in compliance with state and federal law for special populations.

Brief Overview of Major Concerns:

- Significant plagiarism of documents provided by the applicant as evidence of competency and capacity were found throughout the application. The applicant utilized external sources without providing proper citation and represented the materials to be their own work.
 - The applicant demonstrated questionable integrity when in a comment by the applicant during the Capacity Interview that a partnership with TANK had been secured. When follow up with TANK officials was conducted, it was revealed that the applicant misrepresented the nature of the discussion and that there was not, in fact, an agreement between TANK and River Cities Academy to provide transportation for K-5 students.
 - Overall, the applicant lacked evidence to support competency and capacity with regards to providing services as required by state and federal law for special populations. For example, the applicant could not describe the role of the Admissions and Release Committee (ARC) when asked during the Capacity Interview (December 17, 2019).
 - The applicant lacked specificity and provided unfinished planning in multiple areas that leave significant question as to whether or not the school will be able to launch successfully for a proposed August 2020 start date. For example, the applicant did not provide a detailed start-up plan that should act as a roadmap for school implementation.
 - The applicant demonstrated a lack of attention to detail as several questions required by the application were not answered at all by the applicant whether as a result of not reading the question carefully or simply not including all required elements of the posed question.
 - The applicant utilized vague and generalized language with regards to the description and needs of the students and families to be served by the proposed school. The applicant does not provide data to support the complexities of the population to be served and relies on generalized notions of what the applicant believes should be good for all children.
- The lack of authentic evidence of community support was also felt throughout the application. The applicant provided unfounded research methods in the use of a survey to track school demand and did not provide a clear picture of who actually attended the community information sessions leaving the impression that the community demand is limited to those that know the applicant, rather than the breadth of the community.

I. COVER SHEET AND ENROLLMENT PROJECTION

I. COVER SHEET AND ENROLLMENT PROJECTION	PARTIALLY COMPLETE
Section A	Complete
Section B	Partially Complete
Section C	Complete
Section D	Complete
Sections E-G	Complete
Sections H and I	Complete
Sections J-S	Complete
Section T	Partially Complete
Section U	Complete

ANALYSIS

I. COVER SHEET AND ENROLLMENT PROJECTION	PARTIALLY COMPLETE
<p>While the application provides most of the requisite information for this section, the section relies on generalized language or terms without definitions. This is an overall theme throughout the application, as the applicant does not provide clarity around the systems and structures proposed, but instead relies on generalized notions and high-level descriptions. This results in more of a high-level idea rather than an actionable plan.</p>	

II. SCHOOL OVERVIEW

II. SCHOOL OVERVIEW	
School Overview	
A1. Mission and Vision	
2.a-d General School Overview	
B. Pre-Opening Planning and Activities	
C. Educational Need and Anticipated Student Population	
D1. Education Plan/School Design	
2. Unique Features of the School	
3. External, Internal, and State-Required Assessments	
4. Specifically identify comprehensive learning experiences or expanded learning opportunities	
E1. Community Engagement	Partially Meets
2. Strategies to Solicit Community Input	
3. Form and Nature of Feedback	Meets
4. Process to Incorporate Community Input	
F. Leadership and Governance	
G1. Enrollment Summary	Partially Meets
2. Rationale for Enrollment Summary	
3. Total Enrollment Capacity	Partially Meets
4. Exceeding Enrollment Capacity	
5. Minimum Number of Students Enrolled	Partially Meets
6. Description of Plan to Fill Enrollment Vacancies	Partially Meets
7. Enrollment Plan - Growth	Partially Meets
7. Enrollment Plan - Future Growth Renewal	Partially Meets

ANALYSIS

II. SCHOOL OVERVIEW

The reasons below are a high-level overview of the reasoning for a score of **DOES NOT MEET** in this section:

- The applicant does not provide a deep analysis of the targeted population. The applicant provides a generalized description and limits their analysis to data sourced from private company (SchoolDigger) rather than state reported information that is more accurate and timely as it is reported for accountability purposes in compliance with state and federal law. The lack of analysis of student population leads to an overall lack of specificity in tailoring the school plan to the needs of the student body. The applicant has not demonstrated due diligence in understanding or demonstrating an understanding of the complexities in student demographics across the six school districts, exemplified in its generalization of the six school districts as being substantially similar.
- The applicant relies on generalized language like “at-risk”, “high expectations”, and fails to define the parameters of its proposal as a result. The lack of specificity makes it difficult to ascertain whether or not the applicant truly understands the significance of word use and ultimately the need for systems associated with those concepts. For example, during the Capacity Interview (December 17, 2019) the applicant was asked for a definition of “at-risk” and could not provide a specific definition, only general notions of what might be considered at risk.
- The pre-opening activities identified by the applicant are not aligned with a strong plan for school launch. Deadlines are passed, tasks are non-specific, and several required elements like teacher training are not provided. In addition, as evidenced in the Educational Programs and Capacity section, the applicant has not provided a fully developed plan in many cases, leaving the final development to the school leader. The further into the application one reads, the more the school principal (not hired) and eventually school staff are loaded with the development of essential systems to ensure a successful school launch. Many of those needed systems will take time and appropriate study and do not appear reasonable to be developed essentially last minute.
- The information provided to support demand is questionable. The applicant did not provide a description of the survey procedures without evidence of the instrument, the details of the sample, methods, analytical techniques used, etc., in the implementation of this survey. During the Capacity Interview (December 17, 2019) the applicant indicated that they were told by someone that a 101 person response rate for community survey was a legitimate sample size. This is questionable because while the population of the six rivers cities is approximately 94,000, the applicant surveyed 101 residents (.001%) to inform their objectives. The legitimacy of the survey from a research standpoint, is speculative and it can be assumed, without this information that the applicant did not conduct the survey with research legitimacy because the reasonable researcher would add more context to validate the survey results and ground the questions in evidence.
- Another general theme throughout the application is lack of understanding of the complexities and systems required for serving students with disabilities, English Learners, and other special populations. For example, the applicant provides generalized language around special education that indicates a lack of an overall understanding of the legal structures

required by federal and state law. The applicant asserts that the school will be in compliance with state and federal law for special populations (Capacity Interview - December 17, 2019) but does not provide evidence of competency nor capacity to ensure the implementation of a high-quality charter school that serves students with special needs well.

III. EDUCATIONAL PROGRAM DESIGN AND CAPACITY

III. EDUCATIONAL PROGRAM DESIGN AND CAPACITY	
A1. Program Overview - Summary of Essential Elements	
2. Resources and Instructional Materials	
4. Evidence of Success	
5. Improvement of Student Achievement	
6. Student Achievement Goals	
7. Potential Pitfalls	Partially Meets
B1. Curriculum and Instruction - Description of Basic Learning Environment	Partially Meets
2. Overview of Planned Curriculum	Partially Meets
3. Curricular Choices	
4. Basis for Curriculum	
5. Formative Processes	
6. Instructional Planning	Partially Meets
7. Processes to Revise and Evaluate Curricula	
9. High Quality Instruction and Intervention	
C1. Student Performance Standards	
2. Policies and Evidence for Promotion and Retention	
3. Exit Standards for Graduating Students	Partially Meets
E1. School Calendar and Schedule - Annual Academic Calendar	Meets
2. How calendar reflects needs of educational program	
3. Proposed first year of operation	
4. Planned Structure of Student Attendance Day, Week, and Year	
5. Sample Teacher Schedule	

6. Before and After School Care	
F1. School Culture	Partially Meets
2. Implementation of Culture	
3. Strategies to Encourage Attendance and Re-enrollment	Partially Meets
4. School Culture and Students with Special Needs	
5. Likelihood of Success with Targeted Population	
6. Typical Attendance Day - Student	
7. Typical Attendance Day - Teacher	
8. Dress Code	Meets
G1. Supplemental Programming and Health Services - Description of Health Services	
2. Extracurricular or Co-Curricular Activities	
2. Programs or Strategies to Address Student Mental, Emotional and Social Development, etc.	
3. Other Student Focused Activities	Partially Meets
H1. Special Populations and At-Risk Students - Overall Plan	
2. Mild, Moderate, Severe Disabilities	
3. EL	
4. Students Performing Below Grade Level	
5. Gifted and Bilingual	
6. Services from District	Meets
I1. Student Recruitment, Enrollment and Retention	
2. Enrollment Policy	
3. Retaining Students	
J1. Student Discipline - Philosophy	
1. Practices to Promote Good Discipline	

2. Definitions of Offenses for Suspension and Expulsion	
3. Discipline of Students with Disabilities	
4. Bias and Discrimination	
5. Due Process	
6. Discipline Policy Professional Development	
7. Communication of Discipline Procedures	
8. Behavior Intervention Professional Development	
K1. Parent and Community Involvement - Parent Engagement	
2. Philosophy Regarding Parental Engagement	
3. Family-School Partnerships	
4. Parent Commitments	
5. Community Resources Available to Students/Parents	
6. Services Provided to Community	
7. Partnerships and Indication of Support	
M1. Educational Program Capacity - Structure of Leadership Team	Meets
2. Individual and Collective Qualifications	Partially Meets
3. Connection to Target Community	Meets
4. Partner Organizations	
5. School Leader	
N1. Programmatic Audits and Assessments - Plan	
2. Assessments/Measures to be used to evaluate program components	
3. Assessment Results Valid and Reliable	
4. Responsible for Administering Assessments and Data Collection	
5. Methods of Access for Shareholders	Partially Meets
6. Methods of Access for Parents and Students	Partially Meets

7. Technology Infrastructure	Partially Meets
01. Food Service - Description of Plan	Meets
3. Distribution, Collection, and Recording of USDA forms	
4. Description of Overdue Lunch Charges	
5. CEP	
6. Food Allergies and Special Dietary Needs	

ANALYSIS

III. EDUCATIONAL PROGRAM DESIGN AND CAPACITY

The reasons below are a high-level overview of the reasoning for a score of **DOES NOT MEET** in this section:

- **Plagiarism.** The applicant provided several responses in this section and in others throughout the application that were heavily plagiarized, meaning, they provided material that was written by another organization or individual but included in their application as their own. The applicant provided few citations and references to sources. This has direct implications for an assessment of competency and capacity as required by KRS 160.1594 (4) and (7) which requires the authorizer to assess the applicant's competency and capacity to implement a high-quality charter school. The applicant's decision to plagiarize and not provide materials specific to the school's proposed operations is not acceptable and has been noted throughout the rubric where applicable. The vast amount of plagiarized material is astounding, as many of the places require attention to detail with regards to Kentucky law. Additionally, astounding is the applicant's failure to modify some terms to cover the plagiarized work. For example, there are several instances where "Board of Trustees" is subbed for "Board of Directors". Kentucky utilizes the term "Board of Directors" while other state utilizes terms like "Board of Trustees".
- **Generalized language.** Based upon documentation within the application and addendum, there is no confidence in the maintenance of emphasis on high expectations for all students while identifying and responding to challenges with a plan for addressing them. The applicant is negligent in explaining the correlation between selection of resources and instructional material and the targeted student population. Curricular choices indicate a certain failure on behalf of the applicant to meet student achievement goals due to misalignment with most Kentucky Academic Standards. Additionally, the instructional planning lacks evidence-based strategies to ensure high-quality instruction and intervention.
- **Curricular Resources Aligned the Kentucky Academic Standards.** The applicant failed to select curricular resources that are aligned to the Kentucky Academic Standards for core instruction, Reading and Writing, Mathematics and Social Studies, and other content areas, Physical Education and Music.

- Section A. Program Overview

- In attachment 2 the applicant provided curricula for: EL Education, Singapore Math, TCI- Social Studies. The EL Language Program curriculum map indicates its correlations to the Common Core State Standards which are not congruent to the new Kentucky Academic Standards. In this attachment the Singapore Math program also shows its alignment to the Common Core State Standards which are not congruent to the new Kentucky State Standards.
- On page 61 the applicant states that RCA will be implementing TCI for Social Studies grades K-12 curriculum, lesson plans, and teaching resources. The below website referenced on this page indicates state specific social studies programs. Kentucky is not listed as one of the states on this page. Also, Kentucky has recently adopted new social studies standards statewide.
<https://www.teachtci.com/social-studies/elementary-school>
- The adoption of these programs shows a lack of understanding and research done by the applicant of the new standards that are required for each student in the state of Kentucky. In addition, the applicant stated on page 48 that all of the above core courses are, 'aligned to the Kentucky Academic Standards'.
- In attachment 2 they have placed each chosen program scope and sequences. They state that these curriculum maps are provided by RCA's curricula. Again, these programs state they are aligned to the Common Core Standards and Kentucky now follows the Kentucky Academic Standards. They state these 'curriculum maps' will allow them to check for gaps. They will not be able to check for gaps using the incorrect standards on these scope and sequence lists.

- Section B. Curriculum and Instruction

Singapore Math: The applicant provides a sample scope and sequence for Singapore Math, Attachment 2, indicates that this curriculum is aligned to the Common Core Standards (CCS). The applicant does not provide sufficient information that this curricular resource is aligned with Kentucky Academic Standards which indicates the applicant has no indication or knowledge of how teachers and administrators plan instruction and assessment that is congruent to the identified learning targets from the deconstructed standards.

According to What Works Clearinghouse (WWC) Intervention Report (Updated December 2015), "No studies of Singapore Math that fall within the scope of the Primary Mathematics review protocol meet WWC group design standards. Because no studies meet WWC group design standards at this time, the WWC is unable to draw any conclusions based on research about the effectiveness or ineffectiveness of Singapore Math on the achievement of primary students in kindergarten through grade 8. Research that meets WWC design standards is needed to determine the effectiveness or

ineffectiveness of this intervention." This mathematics program hasn't been determined as an evidence-based curricular resource that will have a positive effect on increasing achievement with the identified at-risk student population in this proposal.

- **Physical Education and Music:** The applicant stated (pages 72-73) that RCA will create a Physical Education, Music and Arts curriculum based on the Kentucky Model Curriculum outlined in the Kentucky Academic Standards for Practical Living, Visual and Performing Arts, and Arts and Humanities (cite references 72, 73 and 74). The applicant provided the previous Kentucky standards for these subjects instead of the current adopted Kentucky standards for Physical Education, Music and Arts. This indicates that the applicant has no knowledge or understanding of the newly adopted standards to plan instruction and assessment that is congruent to the identified learning targets from the deconstructed standards.

- **Instructional and Non-Instructional Time.** The applicant demonstrates a lack of understanding of the legal requirements in governing instructional and non-instructional time.

- **Section E. School Calendar and Schedule** - The applicant fails to adhere to KRS 158.070 changes that occurred for the 2018-19 School Year

- This application demonstrates lack of competency on the part of the applicant in designing a school calendar that is accurate and satisfies the Kentucky statutes. The applicant, on page 90, states that RCA will have both a longer school year, of 193 school days and a 7-hour instructional day, which is a longer school instructional hour than the minimum required.

RCA's schedule provides less than the required instructional time for students according to KRS 158.070 (1) (f) "Student instructional year" means at least one thousand sixty-two (1,062) hours of instructional time for students delivered on not less than one hundred seventy (170) student attendance days and the applicant lacks competence in understanding the difference between instructional and non-instructional time. On page 91, the applicant states that RCA will have 193 instructional days with 7 hours of instruction each day built into the school calendar (this may vary by year depending on holidays.) This is a total of 1,330 instructional hours. Attachment 5, School Calendar, shows a discrepancy in the number of instructional days.

Attachment 6, Bell Schedule, shows a discrepancy in the number of instructional hours per day and the total of hours per school year.

The applicant failed to indicate any time for remediation for Tier II or III instruction, they only indicated time for the Homework Cafe in the Attachment B: Bell Schedule.

On page 94 and Attachment B: Bell Schedule, the applicant failed to indicate time teachers will have for planning and a brief scenario describing a typical teacher day and week.

- The applicant failed to provide a detailed plan of how the services would be delivered or funded, only stating that the Building Level Team (BLT) will evaluate options for compensating existing teachers or contracting with an external vendor for tutoring or aftercare services for RCA. This is problematic because the applicant it demonstrates a lack of competency in developing a budget and planning for these before and after-care options.

- **Section F. School Culture:**

- The applicant fails to provide time in a typical day for school wide interventions for this target population. The fact that the applicant fails to identify blocks of time for school wide interventions in for example reading, shows a lack of understanding and capacity to serve this population of students. A typical school in our district has an average of 45% of its kindergarten students at the readiness level according to Brigance Testing yearly. The applicant shows how knowledge of this fact or plan to address this in their typical day for these students.
- The applicant fails to provide any time in its daily schedule for teachers planning each day. Attachment 6.

- **Evidence Based Reasoning for Curriculum/Instruction Selection**

- The applicant failed to provide sufficient research evidence to support the curriculum/instructional strategy selection that will be successful with targeted population.

- **Section A. Program Overview**

Applicant states that all of their programs are widely implemented and boost knowledge and scores with underperforming students locally at numerous schools. They do not provide any of the data which supports this statement locally. The applicant only listed one of the six River City Schools as a school that uses these programs. The rest of the schools listed are located in Ohio or other locations not in Kentucky. The applicant also does not list which of the programs that this school uses from the programs they intend to implement. They also state on page 62 that these programs have remarkable effect upon minorities with achievement, career pathway and personal confidence in subject capabilities. The data that is provided is limited and vague on the website. The data that they provide is from the following website:

<http://stem.piemedia.org/research-facts-and-stats/>

- **Section B. Curriculum and Instruction**

- Singapore Math (Math in Focus)

<https://www.evidenceforessa.org/programs/math/elementary/math-focus>

The applicant provided a research conducted by the Houghton Mifflin Harcourt, seller for the Math in Focus textbook, stating the Math in Focus has a Strong ESSA Rating and an Average Effect Size of +0.18. Researching WWC and ERIC database, indicates that no studies of Singapore Mathematics met WWC evidence standards or the results do not support the hypothesis that

CCSS-aligned curricula narrow the achievement gap. Consequently, the applicant failed to conduct a thorough research using WWC or ERIC database to ensure there is a correlation with Houghton Mifflin Harcourt's ESSA findings. The applicant's understanding of ESSA and the process of reviewing all research for accuracy is minimum and therefore questionable to their competency to ensure that selected curricular resources will have an effect size on student achievement with the target student population.

- EL Language <https://curriculum.eleducation.org/what-educators-are-saying>
 - This research link provides generalization comments without any data to indicate student growth over a period of time, especially with the identified at-risk student population. The applicant demonstrates a lack of understanding of the process for selecting a resource that includes evidence to support the academic achievement for all students.
- Social Studies Alive! <https://www.teachtci.com/about-us> and DiscoveryEducation Social Studies TechBook <https://www.discoveryeducation.com/solutions/social-studies-techbook/>
 - The applicant provided the research links as evidence that these curriculum resources are appropriate and effective for the targeted students, however, neither link included research data to support that the textbooks have any gains in student achievement. The applicant lacks competency in researching curricular resources to determine the effectiveness of increasing academic achievement with any and all student groups.

Special Populations: As mentioned above, the applicant does not provide evidence to suggest that enough time and resources have been spent to ensure the seamless programming for special populations. For example, the applicant does not provide specificity in the answer to question 2 of H. Special Populations and At-Risk Students, which requires reflection on the systems and structures to be put in place for students with mild, moderate, or severe disabilities. The applicant does not reference mild, moderate, or severe disabilities and instead generalizes with a five-step process that does not include reference to state or federal law in this area. Additionally, when asked during the Capacity Interview (December 17, 2019) about where the Admissions and Release Committee process fits into the applicant's special education plan, the applicant appeared to not know what the ARC was, much less its role in special education. This is one example of several where the applicant simply does not answer the question posed. As such, the applicant was not given credit if the answer was not directly aligned to the question posed.

Student Discipline: While the applicant provides a Student Discipline Policy, much of it is plagiarized and does not reflect the student due process rights provided in state law. Additionally, there does not appear to be a clear understanding by the applicant as to the protections and expectations for student discipline with regards to students with disabilities.

Proposed Partnerships. The applicant provides a list of potential partners but has not contracted with third-party vendors at this point. In some cases, like food service and health services, the applicant has not even contacted the potential vendor listed in the application.

This is cause for great concern because the applicant provides no evidence that the potential vendor has the capacity to provide the services indicated. For example, the Northern Kentucky Cooperative for Educational Services (NKCES) is listed several times by the applicant as a potential vendor for services. NKCES does not provide direct student services and would therefore not be a likely partner to provide services. The applicant does not appear to realize that is the case as many services are connected to the NKCES reference.

IV. OPERATIONS PLAN AND CAPACITY

IV. OPERATIONS PLAN AND CAPACITY	
A1. Legal Status and Governing Documents - Legal Status	Meets
1. Attachment 13 - Legal Status	Partially Meets
2. Statement of Assurances	Meets
B. Organizational Charts - Attachment 15	
C1. Charter School Board of Directors - Attachment 15	
2. Governance Structure	
3. Structure of the Board	
4. Skills, Areas of Expertise, and Constituencies	
5. Rationale for the Structure and Composition	
6. Current and Identified Board Members	Meets
7. Summary of Board Interest	Meets
8. Signed Information Sheets	Meets
11. Procedure for Board Selection	Partially Meets
12. Description of Ethical Standards	Meets
12. Code of Ethics	Meets
13. Conflicts	Meets
14. Capacity Building for Board	Meets
15. Dispute Resolution Process with Authorizer	
E. Grievance Process for Parents/Guardians	
F1. Staff Structure - Staffing Chart	
2. Relationship between Senior Admin and Staff	

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G1. Staffing Plans, Hiring, Management, and Evaluation - School and Employees	
2. Personnel Policies	
3. Outline of Salary Ranges, Employee Benefits, and Incentives	
4. Strategy, Plans and Timeline for Recruiting and Hiring	
5. Procedures for Hiring and Dismissing School Personnel	
6. Leadership Evaluation, Support and Development	
7. Teacher Evaluation, Support, and Development	Partially Meets
8. Unsatisfactory Leadership or Teacher Performance	
H1. Professional Development - Person Responsible Identified	Meets
2. Core Components of PD	
3. PD - Internally and Externally; Individualized or Uniform	
4. Days and Hours for PD; Schedule	
5. PD Evaluation	
6. Restraint and Seclusion Training	
I1. Performance Management- Mission Specific Goals and Targets	Partially Meets
2. Mission Specific Organizational Goals and Targets	
3. Interim Assessments	Partially Meets
4. Measure and Evaluation of Academic Progress	
5. Collection and Analysis of Student Academic Achievement Data	
6. Staff Responsible for Managing and Interpreting Data	Partially Meets
7. Training and Support for Data Analysis	
8. Corrective Action	
9. Trigger for Corrective Action	
J1. Facilities Experience and Planning -Experience of Board/Applicant	
2. Description of Interaction with Gov Agencies Regarding Facilities	

3. Inputs and Sources of Information Used	
L1. Independent Facilities - Process for Identification	Partially Meets
3. Description of Facilities	Meets
4. Alignment with Academic Program and Student Needs	Partially Meets
5. Renovation	
5. Zoning and Occupancy	
5. Code	
5. Involvement of Targeted Community in Facility Design and Selection	
5. Specialty Classrooms	
5. Administrative/Support Space Needs	
5. Athletic Program	
M1. Start-Up and Ongoing Operations - Start Up Plan	
2. Transportation	
3. School Safety	
4. Insurance Coverage	Partially Meets
5. Schedule and Explanation of PD Prior to First Day	
N1. Operations Capacity - Qualifications	Partially Meets
2. Capacity in Facilities Acquisition	

ANALYSIS

IV. OPERATIONS PLAN AND CAPACITY

The reasons below are a high-level overview of the reasoning for a score of **DOES NOT MEET** in this section:

Plagiarism. Again, this section has several documented instances of plagiarism which directly conflict with the applicant's duty to provide evidence of competency and capacity in its ability to implement a high-quality charter school. Where plagiarism was found, a note has been provided in the rubric.

- **Governance.** The applicant provides the appropriate documentation as evidence of non-profit status. However, that documentation reveals a lack of understanding as to how the board will operate as a non-profit with additional requirements per state charter school law. For example, the bylaws included in Attachment 17 appear to be basic Kentucky non-profit bylaws that do not take into account the fact that a charter school will be subject to more transparency requirements (Open Records and Open Meetings) than typical non-profits.
- **Board Structure.** The board appears to lack membership of an individual representing the law skill set as required by KRS 160.1592(8) and does not provide a specific statement as to filling that need.
- **Planning.** The applicant makes many broad encompassing statements on a variety of questions within the Operations Plan. However, the major concerns are the lack of detailed planning, experience, and the reliance on outside sources to complete many of the areas. Given the amount of detailed planning required from this point forward in order to get a school up and running, hire staffing, determine facility to be utilized, etc. It is unreasonable to expect this could happen without significant gaps that could have a negative impact on their targeted population.
- **Staffing.** The applicant does not appear to have a clear understanding of the nuances of certified staffing, especially in the area of special populations. There is no detailed plan that ensures RCA understands the requirements or is prepared to hire certified special education teachers for each area of disability as required by state statute for special education populations. Additionally, when asked about certified staffing for special education during the Capacity Interview (December 17, 2019) the applicant seemed to believe that should there be a need to add an additional special education teacher based on the students' needs to be served, the school should just be able to substitute a general education teacher for a special education teacher. This demonstrates a lack of understanding as to how special education teachers are staffed and parameters around staffing per IDEA and state law.
- **Professional Development.** The applicant failed to demonstrate the competency to develop a professional development plan that provides clear expectations and opportunities for all staff members to support effective implementation of the educational program and evaluative measures to assess its effectiveness and success.

The applicant states that teachers will participate in 'weekly' professional development and workshops trainings. The applicant gives does not give a detailed plan which outlines the training and support teachers will receive in analyzing, interpreting and using performance data to improve student learning. This plan contradicts all of the other responsibilities that teachers have been given such as after school homework cafe etc. The applicant plainly lists, without any further explanation the PD courses the teachers will have with no other given details in this section.
- **Restraint and Seclusion.** On page 180, the applicant stated that in compliance with Kentucky Law, all teachers will receive required training including the use of physical restraint and seclusion, and the prevention, recognition, and reporting of child abuse and neglect. The

applicant failed to assure that all school personnel will be trained regarding the use of physical restraint and seclusion as required by 704 KAR 7:160.

- **Goal Setting.** The applicant fails to provide goals in the areas of gap, growth, separate academic indicators and transition readiness. All other schools in the River Cities area are held accountable in all these areas. This shows lack of research completed into Kentucky's accountability system. RCA is vague in setting goals also in this area. They do not list any particular area of accountability in this section, in this section 'other academic performance', they only include a general statement for K-PREP results. In addition, the applicant failed to provide a detailed plan, Continuous School Improvement Plan (CSIP), as required by statute (see below) with core components: needs assessment, goals, objectives, strategies, activities, measures of success, progress monitoring and funding.

703 KAR 5:225. Continuous improvement planning for schools and districts

- (4) "Comprehensive School Improvement Plan" or "CSIP" means a plan developed by the school council, or successor, and charter schools with the input of parents, faculty, and staff, based on a review of relevant data that includes targets, strategies, activities, and a time schedule to support student achievement and student growth, and to eliminate achievement gaps among groups of students.

- **Transportation.** The applicant states that one option for student transportation includes the use of the Transit Authority of Northern Kentucky (TANK) for transporting students K-6. When asked about this during the Capacity Interview (December 17, 2019) the applicant provided that a conversation and plans had been made with TANK and that the organization was willing to partner with the school for transporting students K-6 with the addition of bus monitors. The authorizer researched and discussed this statement with TANK officials and discovered that the situation was not as the applicant had provided. Documentation of this discovery is included as part of the final recommendation. This raises not only issues about the basic question about how transportation will be provided, but also about the competency, capacity, and integrity of the applicant as it appears this was an intentional misrepresentation in an effort to allay concerns about the transportation plan. Applicant integrity is discussed earlier in this final recommendation.

V. FINANCIAL PLAN AND CAPACITY

V. FINANCIAL PLAN AND CAPACITY
A1. Financial Plan - Description for Systems, Policies and Processes
2. Roles and Responsibilities
3. Fiscal and Internal Controls
4. Financial Management Plan
5. Annual Audit
6. Acting on Audit Results
7. Financial Transparency
8. Services to be Contracted
9. Liability Insurance
10. Budget Form - Attachment 25 - Budget Template
11. Budget Form - Attachment 25 - Cash Flow Template
B1. Budget Narrative - Attachment 27 - Revenue
2. Budget Narrative - Variable Income
C. Financial Management Capacity - Qualifications

ANALYSIS

V. FINANCIAL PLAN AND CAPACITY

The reasons below are a high-level overview of the reasoning for a score of **DOES NOT MEET** in this section:

Generalized language. The financial section of the application is significantly plagued by a lack of clarity as to the systems, assumptions, and evidence of capacity as required by the application questions. There are few and limited references to Kentucky law, but nothing that explicitly cites relevant law that governs in the area of finance.

MUNIS. The applicant does not reference use of or budgeting for MUNIS as required by KRS 160.1592(3)(i).

- **Revenue.** The following assumptions are made but not supported by evidence:
 - Revenue assumes \$2,242,994 in Public Funds based on ADA allocation, but state budget does not include such allocation
 - Revenue assumes \$225,000 in Charter Schools Grants but no evidence of securing grant is included in application
 - Revenue assumes \$150,000 in Federal and State Grants but no evidence of securing grants is included in application
 - Revenue assumes Direct Contributions of \$75,000 but donor commitments are not included within application
- **Federal Funding.** The applicant makes several assumptions as to the use of federal funding, treating it more like an unrestricted fund source. In reality, federal funding from each of the federal programs is heavily restricted for programmatic use and is subject to specific rules and requirements.

VI. CLOSURE AND DISSOLUTION

VI. CLOSURE AND DISSOLUTION

Closure Procedure

ANALYSIS

VI. CLOSURE AND DISSOLUTION

The reasons below are a high-level overview of the reasoning for a score of **DOES NOT MEET** in this section:

- Inadequate detail is outlined on the closure and dissolution plan other than referencing KRS 160.1593(3)(q) and 701 KAR 8:020. Applicant documents marginal comprehensive planning efforts to facilitate a smooth and orderly transition for students to a new school. While the applicant does cite the National Association of Charter School Authorizers in its inclusion of the closure plan, the applicant does not make an effort to align the plan with Kentucky law.

VII. OPTIONAL INFORMATION

VII. OPTIONAL INFORMATION	
1. Demand for Charter School	
2. Role of Parents and Community in Application	Partially Meets
3. Assessment of Demand	
4. Letters of Support	Concerns Noted
5. Strategies for Relationship with District	
6. Strategies for Partnership with District Persistently Low-Achieving Schools	
7. RTI	
8. Trauma Informed Care Services	
9. Trauma Informed Care PD	
10. Culturally Responsive Teaching PD	

ANALYSIS

VII. OPTIONAL INFORMATION

The reasons below are a high-level overview of the reasoning for a score of **DOES NOT MEET** in this section:

- Outreach:** There is no evidence of a carefully constructed detailed plan for the charter school. The applicant has shared limited numbers of surveys, letters of support that demonstrate limited numbers of potential students.
- Community Meetings:** Community meetings consisted of 60 people. When broken down you see a total of 22 individuals not connected to the Board, previous attendees, or on Outreach listing.
- Roles of parents and community in the process:** Roles of parents and community in the process consisted of 2 community meetings and website feedback do not show a demand for a charter school. There was no evidence provided for the website feedback. Out of approximately 94,000 residents and 11,000 students in the targeted River Cities only 101 surveys were completed.
- Assessment of the demand:** Assessment of the demand is not supported by documentation.
- Letters of support:** Letters of support lacked significant parental feedback from parents with school age children.

- Surveys provided shared showed only 1 response with a child of school age to attend the charter school.
- **Building Relationships.** There is no evidence of building relationships with the 6 districts as applicant has moved forward or the sharing of strategies to show evidence of potential success.
- **RTI.** There are no behavioral strategies listed nor a detailed plan for RTI dealing with the targeted group of At-Risk students.
- **Trauma Informed Care.** Trauma Informed Care is not detailed and has total reliance on outside agencies to provide support and professional development without a clear indication as to whether or not outside agencies have been partnered with, have the capacity to provide services, etc.
- **Culturally Responsive Teaching.** There are no evidence-based strategies detailed to culturally responsive teaching. Once again, all aspects are to be addressed by unknown outside agencies.

Public Comment was taken via a Google Form posted on the Newport Independent Schools webpage from December 11, 2019 through December 20, 2019. The unaltered comments are provided as an attachment. Thirty comments were collected.

A Public Forum was held in compliance with KRS 160.1594(3)(c) on December 18, 2019. The applicant and several of the proposed school's board were present and spoke in addition to multiple school and district leaders from the area school districts. The unaltered video and audio are provided as an attachment.

A Capacity Interview was held in compliance with KRS 160.1594(3)(b). The applicant was asked a series of probing questions for forty-five (45) minutes based on the application submitted. The question was led by the Board Chair, Ramona Malone, and the Board received answers from the applicant. The unaltered video and audio are provided as an attachment.

A Capacity Interview was held in compliance with KRS 160.1594(3)(b). The applicant was asked to complete a performance task that included a real-life scenario and required the applicant to provide best thinking around four prompts. The performance task was introduced by Board Chair, Ramona Malone, and the Board received answers from the applicant and proposed board. The unaltered video and audio are provided as an attachment, as well as a copy of the performance task.

- 1. Rubric Evaluation**
- 2. Plagiarism Report (In Binder 2)**
- 3. Email with TANK Officials**
- 4. Kentucky School Board Association Statement on Charter School Funding**
- 5. Video and Audio of Capacity Interview (December 17, 2019)**
- 6. Video and Audio of Public Forum (December 18, 2019)**
- 7. Public Comment from Google Form**
- 8. Public Comment in the Form of Letters Received**