

Anchor Goal 2: 100% of 8-year-olds will read on grade level

The ability to read is critical to academic success

- Students who are not proficient readers by the end of third grade are four times more likely to drop out of high school
- Students who are living in poverty for at least one year and not proficient in reading by the end of third grade are <u>six times more</u> <u>likely to drop out</u> than their proficient peers
- Following third grade, <u>success in nearly all subject areas</u> depend on a student's ability to read

Major components

- 1. Reliable, research-based, reading assessments implemented with fidelity
- 2. Equip all K-3 teachers with best practices through professional development, literacy coaches, and high quality instructional materials
- 3. Coordinate with outside-of-school efforts citywide through the READ By 4th campaign
- 4. Pilot and evaluate additional promising evidence-based strategies and programs

Anchor Goal 2: 100% of 8-year-olds will read on grade level

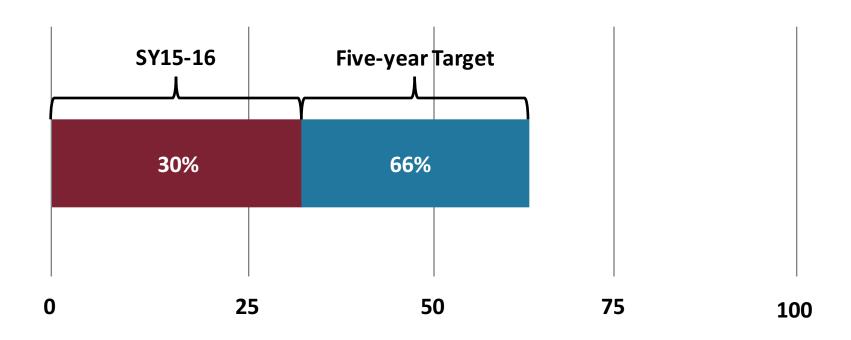
- **SY13-14** Established four anchor goals
- **SY14-15** William Penn/Lenfest Foundations fund 3-year literacy initiative
- **SY15-16** First year of implementation 40 elementary schools
- **SY16-17** Second year of implementation 93 elementary schools
- **SY17-18** Third year of implementation all elementary schools

Early indicators of success

- Assessments of teachers attending the week long Summer Literacy Institute indicate increased knowledge concepts and practices
- Early Literacy Specialists have helped to reduce the percent of students requiring a literacy intervention across all grades
- Students receiving support from Reading Specialists are showing increases in reading growth
- Literacy growth in Kindergarten and third grade students in Cohort 1 schools outpaced that of all other schools

Anchor Goal 2: 100% of 8-year-olds will read on grade level

Third-grade students proficient or advanced on the PSSA standardized test

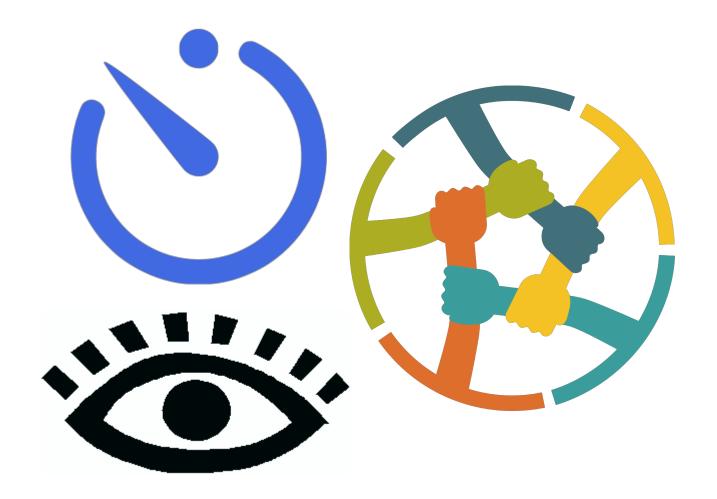


\$20 million investment in school year 2017-2018

- All elementary schools will have participated in the <u>Early Literacy</u>
 <u>Summer Institute</u>
- All K-3 teachers will have the support of an <u>early literacy coach</u>
- All K-3 classrooms will have <u>level classroom libraries</u>



Office of Teaching & Learning

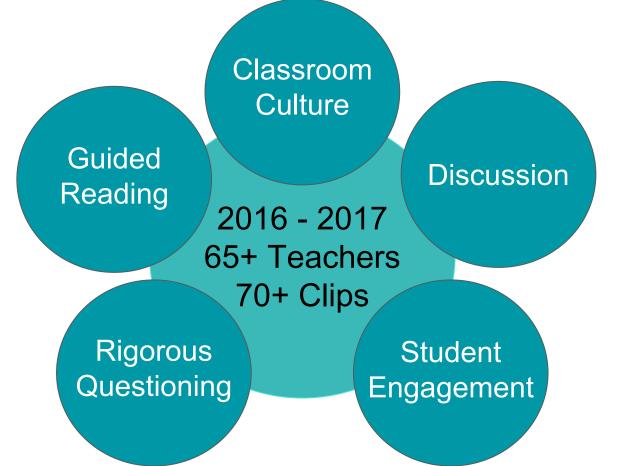


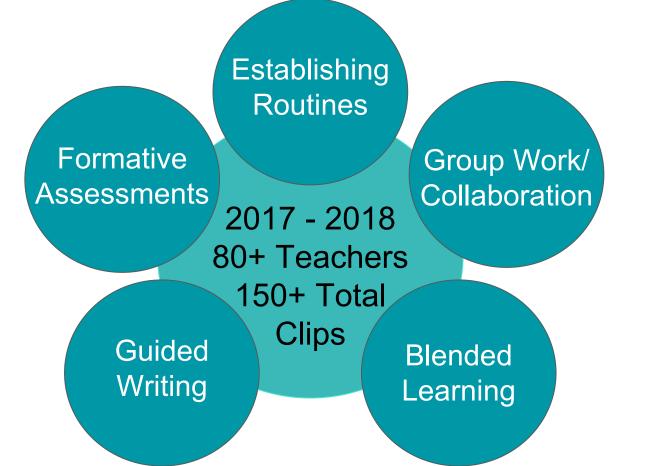
Catalog effective teaching practices in schools representative of the district's landscape

Isolate **concrete teacher actions** to
support developing and
refining specific skills

Create a **professional development resource**that is easy to access
and navigate

- 100% of students will graduate, ready for college and career.
- 100% of 8-year-olds will read on grade level.
- 100% of schools will have great principals and teachers.







Office of Teaching & Learning



Charter School Renewal Recommendations and Charter Amendment Requests

Presentation to the School Reform Commission
Charter Schools Office

June 15, 2017



Renewal Overview

The recommendation to renew a charter for a subsequent five-year period is based on a comprehensive review of three domains:

I. Academic Success

- Academic proficiency compared to District, charter sector and peer averages
- Academic growth compared to the statewide standard
- Attendance trend and comparison to median
- Graduation rate trend and comparison to District, charter sector and peer averages (high schools)

II. Organizational Compliance and Viability

- Mission and innovation
- Compliance with special education, English Language Learner, student enrollment, student discipline, personnel, food program, school safety and student health services requirements
- Board governance and adherence to laws, submission of required documentation

III. Financial Health and Sustainability

- Short and long-term financial performance
- Adherence to generally accepted standards of fiscal management



Renewal Overview

Each of the three domains is rated as Meets Standard, Approaches Standard or Does Not Meet Standard.

Academic success is a primary consideration for charter renewal.

A charter school that does not meet the standard for academic success will be considered for nonrenewal regardless of ratings in the other two domains.

Academic Success Organizational Compliance **Approaches Does Not Meet** Meets **Standard** Standard Standard Health Meets 5-Year Renewal Standard **Financial Approaches** 5-Year Renewal with Conditions **Nonrenewal** Standard Does Not Meet Standard



Renewal Conditions

Conditions are recommended based on the performance of each charter school in the three domains evaluated – academic success, organizational compliance and viability, and financial health and sustainability.

Three categories of conditions are recommended by the Charter Schools Office:

1) Conditions for performance prior to finalization of charter

- •Submission of required documents (e.g. SOFI or employee clearances)
- •Submission of compliant policy or procedure (e.g. Enrollment, English Language Learner)

2) Conditions for performance during the charter term

- Academic performance plan and monitoring (proficiency or growth)
- •Plan to resolve related party/conflicts of interest issues
- •Monitoring to ensure compliance issues identified at renewal do not persist

3) Renaissance charter conditions

- Enrollment from catchment
- •Code of Conduct aligned to the intent of the School District's code

Charter schools in Philadelphia can be Non-Renewed or

Renewed for 1 year or 5 years with or without Conditions.



Charter School Amendments

- •Amendments are modifications to a Charter, amendment requests can be during the charter term or at renewal
- •Amendment requests commonly are made to propose changes in the educational program, enrollment, location, school name, operations or charter management organization
- •Amendments may be material or non-material; material amendment requests receive a comprehensive review by the CSO including a report
- Material amendments include:
 - Change to grade levels and/or number of students authorized to enroll
 - Change in building location or addition of new facility
 - Name change of a charter school
 - Significant change to a charter school's mission, program, or educational plan
 - Change to the charter school's management organization

Recommendation: Non-Renewal

Location: East Falls

Student Population: 332 students in Grades 7 - 12

(2015-16)

| | Eastern University Academy | District |
|----------------------------|----------------------------------|----------|
| Special Education | 19.6% | 15.4% |
| English Language Learners | 0% | 10% |
| Students Living in Poverty | 64.2% | 63.5% |

Mission: "Eastern University Academy seeks to provide a holistic, college-integrated learning community dedicated to the education of each student in the context of his or her unique interests."

| Renewal Evaluation Overview | | | | |
|---|------------------------|--|--|--|
| I. Academic Success (MS) | Does Not Meet Standard | | | |
| I. Academic Success (HS) | Does Not Meet Standard | | | |
| II. Organizational Compliance and Viability | Does Not Meet Standard | | | |
| III. Financial Health and Sustainability | Approaches Standard | | | |

I. Academic Success (MS)

Does Not Meet Standard

- Math, ELA/Reading and Science proficiency exceeded at least two of three comparison averages in 0 instances during the charter term
- School met or exceeded the growth standard in tested subjects in 2 of 12 instances during the charter term; in 2 of 8 instances specifically in Math and ELA
- Rate of attendance in MS grades decreased by 70 percentage points and only was at or above the median of similar schools in only one year of the charter term

| | 2012-13 | 2013-14 | 2014-15 | 2015-16 |
|----------------------------------|---------|---------|---------|---------|
| Math Proficiency | 52.96% | 34.71% | 0.95% | 0.00% |
| ELA/Reading Proficiency | 50.03% | 44.73% | 14.42% | 23.08% |
| Science Proficiency | 17.00% | 12.00% | 17.57% | 15.00% |
| Math AGI (standard >= -1) | 2.39 | -6.79 | -2.21 | -5.30 |
| ELA/Reading AGI (standard >= -1) | -3.31 | -3.14 | -1.66 | 1.34 |
| Attendance (95% or more days) | - | 86.4% | 15.0% | 16.0% |

I. Academic Success (HS)

Does Not Meet Standard

- Algebra I, Literature and Biology proficiency exceeded at least two of three comparison averages in only 3 of 12 instances during the charter term
- School met or exceeded the growth standard in tested subjects in 7 of 11 instances during the charter term
- School's rate of attendance in HS decreased by 10 percentage points and was at or above the median of similar schools in only one year of the charter term
- Graduation rate fell by 4 percentage points but exceeded at least two of three comparison averages in all years of the charter term

| | 2012-13 | 2013-14 | 2014-15 | 2015-16 |
|---------------------------------|---------|---------|---------|---------|
| Algebra I Proficiency | 43.00% | 20.00% | 14.71% | 34.50% |
| Literature Proficiency | 49.00% | 51.00% | 38.46% | 63.60% |
| Biology Proficiency | 0.00% | 18.00% | 17.91% | 41.90% |
| Algebra I AGI (standard >= -1) | -2.13 | -7.82 | -0.13 | 1.45 |
| Literature AGI (standard >= -1) | 5.06 | -2.88 | -0.95 | 0.26 |
| Biology AGI (standard >= -1) | - | -1.05 | 1.53 | -0.19 |
| Attendance (95% or more days) | - | 40.5% | 23.0% | 31.0% |
| HS Graduation Rate | - | 83.1% | 79.0% | 79.0% |

| II. Organizational C | II. Organizational Compliance and Viability ¹ | | | | | |
|------------------------------|--|---|--|--|--|--|
| Special Education | Does Not Meet Standard | Evidence of a school-wide screening program including evidence based interventions and tracking of student progress was not provided. Policies and practices were not in place to consistently and timely reevaluate students with disabilities. IEPs reviewed onsite had 15% error rate and 20% reviewed failed to show evidence of parent participation. | | | | |
| English Language Learners | Does Not Meet Standard | School's ELL policy does not articulate program exit criteria compliant with PDE requirements. | | | | |
| Board Governance | Does Not Meet Standard | Board practices do not appear to comply with the Sunshine Act and Statements of Financial Interest requirements. Although bylaws appear consistent with CSL and Charter, the Board did not take required actions per bylaws. | | | | |
| Personnel | Does Not Meet Standard | School did not meet certification requirements for 75% certified and 100% highly qualified in all years of the charter term. Employee checks and clearances were not obtained by the school as required; in 20 records reviewed, 4 missing PA Child Abuse, 5 missing PA Criminal Background, 15 missing current FBI background and 14 eligible employees were missing Act 168 documentation. | | | | |
| Timely Reporting | Does Not Meet Standard | 2 of 4 annual reports (2014 and 2015) were not submitted timely during the charter term. | | | | |

¹Only those categories which either Meet Standard or Do Not Meet Standard are listed herein. Categories in which the school Approached Standard are detailed in the Renewal Recommendation Report. If Approached Standard, Enrollment and Student Discipline displayed for Renaissance charter schools only.

III. Financial Health and Sustainability¹

Generally Accepted Standards of Financial Practice

Meets Standard • The School did not have audit findings, financial transactions, related parties, payroll or PSERS issues identified during the charter term.

¹Only those categories which either Meet Standard or Do Not Meet Standard are listed herein. Categories in which the school Approached Standard are detailed in the Renewal Recommendation Report. If Approached Standard, Enrollment and Student Discipline displayed for Renaissance charter schools only.

Recommendation: 5-Year Renewal with Conditions

Location: Center City

Student Population: 623 students in Grades 9 -12

(2015-16)

| | PE&T | District |
|----------------------------|-------|----------|
| Special Education | 18.9% | 15.4% |
| English Language Learners | 0.6% | 10% |
| Students Living in Poverty | 62.6% | 63.5% |

Mission: "The mission of the Philadelphia Electrical & Technology Charter HS is to develop students who will be employable in the emerging high-tech industries; while giving students a strong foundation in the core academic subjects: math, science, language arts, social studies and world languages."

| Renewal Evaluation Overview | |
|---|----------------------------|
| I. Academic Success | Approaches Standard |
| II. Organizational Compliance and Viability | Approaches Standard |
| III. Financial Health and Sustainability | Approaches Standard |

I. Academic Success

Approaches Standard

- Algebra I, Literature and Biology proficiency exceeded at least two of three comparison averages in 6 of 12 instances during the charter term but in Literature in all years
- School met or exceeded the growth standard in tested subjects in 11 of 12 instances during the charter term
- School's rate of attendance increased by 7 percentage points but was at or above the median of similar schools in only one year of the charter term
- Graduation rate was essentially unchanged but exceeded at least two of three comparison averages in all years of the charter term

| | 2012-13 | 2013-14 | 2014-15 | 2015-16 |
|---------------------------------|---------|---------|---------|---------|
| Algebra I Proficiency | 30.00% | 42.00% | 52.95% | 49.50% |
| Literature Proficiency | 65.00% | 59.00% | 75.18% | 66.10% |
| Biology Proficiency | 17.00% | 14.00% | 21.17% | 36.10% |
| Algebra I AGI (standard >= -1) | -4.50 | 1.70 | 0.27 | 4.14 |
| Literature AGI (standard >= -1) | 3.02 | 4.43 | 2.58 | 6.25 |
| Biology AGI (standard >= -1) | -0.14 | 1.70 | 2.55 | 0.07 |
| Attendance (95% or more days) | - | 27.9% | 35.0% | 35.0% |
| HS Graduation Rate | - | 92.3% | 87.5% | 91.8% |

| II. Organizational Compliance and Viability ¹ | | | | |
|--|------------------------------|--|--|--|
| Special Education | Meets Standard | Appears to have policies and procedures to appropriately screen, identify evaluate and serve students with disabilities. | | |
| English Language Learners | Meets Standard | Appears to have compliant policies and practices for identification, evaluation, notification and annual assessment of ELLs. | | |
| Board Governance | Does Not Meet Standard | Board practices do not appear to comply with Sunshine Act and Ethics Act requirements. | | |
| Timely Reporting | Does Not Meet Standard | Financial audits for 2 of 4 years were not submitted timely during the charter term. | | |

¹Only those categories which either Meet Standard or Do Not Meet Standard are listed herein. Categories in which the school Approached Standard are detailed in the Renewal Recommendation Report.

Increase Authorized Enrollment by 800 seats New grade levels Kindergarten – Grade 8 Additional facility/location **Amendment:**

Recommendation: Deny

Rationale:

The Charter School seeks to add 800 seats in new grades, K-8, reaching a proposed maximum authorized enrollment of 1400 students in K-12 by school year 2021-22. Although a complete and thorough academic plan was submitted for the new grades, the Charter School has not yet identified or secured a facility for Year 2 and beyond. Further, the renewal evaluation identified a Board conflict which involves the temporary facility proposed for Year 1. There are also outstanding concerns regarding the enrollment and staffing plan for the new grade levels. Additionally the existing high school would lose 100 quality seats as a result of this amendment as proposed.

Enrollment Proposed in Amendment Request:

| | 2016-2017 | 2017-2018 | 2018-2019 | 2019-2020 | 2020-2021 | 2021-2022 |
|------------------|-----------|--------------|-----------|-----------|-----------|-----------|
| Grades Served | 9-12 | K-1, 9-12 | K-12 | K-12 | K-12 | K-12 |
| Total Enrollment | 600 | 730 | 875 | 1050 | 1175 | 1400 |

West Philadelphia Achievement Charter School

Recommendation: 5-Year Renewal with Conditions

Location: West Philadelphia

Student Population: 703 students in Kindergarten – Grade 5

(2015-16)

| | West Philadelphia Achievement | District |
|----------------------------|-------------------------------------|----------|
| Special Education | 8.0% | 15.4% |
| English Language Learners | 0% | 10% |
| Students Living in Poverty | Not Available | 63.5% |

Mission:

"WPACES is a loving environment where the whole child will flourish. WPACES staff is dedicated to assuring that all children blossom through effective and passionate instruction. We integrate the arts, technology, and teaching to the multiple intelligences of our students through differentiated instruction. Family and community involvement is an integral part of our school's mission to enrich students' lives."

| Renewal Evaluation Overview (in 2015-16 renewal cohort) | | | | |
|---|--|--|--|--|
| I. Academic Success Approaches Standard | | | | |
| II. Organizational Compliance and Viability Does Not Meet Standard | | | | |
| III. Financial Health and Sustainability Approaches Standard | | | | |

West Philadelphia Achievement Charter School

I. Academic Success

Approaches Standard

- •Math and ELA/Reading proficiency exceeded at least two of three comparison averages in all instances during the charter term
- •School met or exceeded the growth standard in tested subjects in 6 of 8 instances during the charter term in Math and ELA/Reading
- •School's achievement gap for students with IEPs decreased in Math and Reading/ELA; the achievement gap between males and females was unchanged in Math and increased by 9 percentage points in Reading/ELA

| | 2011-12 | 2012-13 | 2013-14 | 2014-15 |
|----------------------------------|---------|----------------------|----------------------|----------------------|
| Math Proficiency | 57.0% | 56.4% | 49.5% | 17.6% |
| ELA/Reading Proficiency | 42.0% | 44.9% | 44.2% | 38.2% |
| Math AGI (standard >= -1) | 0.35 | 3.61 | -1.82 | 1.62 |
| ELA/Reading AGI (standard >= -1) | -0.90 | 2.60 | 0.78 | -1.86 |
| Achievement Gap – Math | - | IEP:37pp M/F:6pp | IEP:31pp M/F:2pp | IEP:31pp M/F:6pp |
| Achievement Gap – Reading/ELA | | IEP:28pp M/F:11pp | IEP:20pp M/F:11pp | IEP:17pp M/F:20pp |

West Philadelphia Achievement Charter School

| II. Organizational C | II. Organizational Compliance and Viability ¹ | | | | |
|--|--|---|--|--|--|
| Special Education | Does Not Meet Standard | Evidence of school-wide screening and referral program including evidence based interventions, referral protocol without barriers for parent referral, and tracking of student progress not consistently observed. Policies and practices were not in place for consistent and timely professional development for teachers, instruction was provided by general education teachers, service levels not aligned to student needs. | | | |
| Enrollment | Does Not Meet Standard | School's application and enrollment practices have barriers to entry. Application requires SSN, ethnicity and language spoken. Materials required to enroll include medical records, report cards, test results and custody documents. These are beyond what can be required per state regulation. Applicants must pick up application materials in person and preference is not given to Philadelphia residents. No application deadline or lottery. | | | |
| Board Governance | Does Not Meet Standard | Board practices do not appear to comply with the Sunshine Act and Statements of Financial Interest requirements. Although bylaws appear consistent with CSL and Charter, the Board did not take required actions per bylaws. | | | |
| III. Financial Health and Sustainability ¹ | | | | | |
| Generally Accepted Standards of Financial Practice | Does Not Meet Standard | The School had material audit findings in 2 of 4 years, financial (contract) and payroll transactions inconsistent with GAAP, and failure to withhold appropriate payroll taxes and issue 1099s during the charter term. | | | |

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Charter School Amendments

On May 1, 2017, the CSO presented charter amendment recommendations for charter schools in the 2016-17 renewal cohort. SRC action did not occur on any charter amendments presented on May 1 that did not have a signed charter agreement. The CSO requests that the SRC take action on these amendments today so that there is a record of action by the end of the school year.

| Charter School | Amendment | Recommendation |
|----------------------------|---|----------------|
| Franklin Towne Charter ES | Increase Authorized Enrollment (375 seats) Additional Facility/Location | Deny |
| General David B. Birney CS | Name Change | Approve |
| Inquiry Charter School | Increase Authorized Enrollment (200 seats) | Deny |
| Keystone Academy CS | Increase Authorized Enrollment (900 seats) | Deny |
| Tacony Academy CS | Increase Authorized Enrollment (125 seats) | Deny |

Mathematics, Science and Technology Community Charter School (not in renewal cohort)

Amendment: Increase Authorized Enrollment by 150 seats

Recommendation: Approve

Rationale:

The Charter School seeks to add 150 seats in existing grades, primarily 25 seats in Kindergarten and 125 seats in Grades 9-12 at scale. The expansion would begin with Kindergarten in the 2017-18 school year. Kindergarten seats are expected to go to siblings on the waitlist; however the 125 high school seats are expected to add new quality seats to the sector. The Charter School submitted a sound staffing plan and budget and has sufficient space in its planned facilities. Additionally, in recent years the Charter School has exceeded the academic performance standards as per the Charter Schools Office's charter performance framework, has minimal concerns in organizational compliance and financial health, and has demonstrated evidence of community support for these additional seats in Philadelphia.

Enrollment Proposed in Amendment Request:

| | 2016-2017 | 2017-2018 | 2018-2019 | 2019-2020 | 2020-2021 | 2021-2022 |
|------------------|-----------|-----------|-----------|-----------|-----------|-----------|
| Total Enrollment | 1250 | 1275 | 1325 | 1350 | 1375 | 1400 |

Pan American Academy Charter School (not in renewal cohort)

Amendment: Additional Facility/Location

Recommendation: Approve

Existing Location: 2830 North American Street, 19133

Fairhill neighborhood, Philadelphia

Proposed Additional Location: 2800 North American Street, 19133

Fairhill neighborhood, Philadelphia

Rationale:

The Charter School's existing facility will remain the primary instructional facility. The Charter School seeks to add an additional, adjacent location to provide students a gymnasium, auditorium and dedicated music/specials instructional rooms. Currently, the Charter School offers physical education in regular classroom spaces with small equipment. Additionally, moving specials programming to the new facility will create space for a Parent Resource room and an after-school activities office. The Charter School has submitted all necessary documentation for approval of the additional facility request including a sound and detailed budget and facility plan. An outstanding item is the certificate of occupancy - once the construction is complete the Charter School will provide this prior to occupying the facility.



Charter School Revocation Recommendation Khepera Charter School

Presentation to the School Reform Commission
Charter Schools Office

June 15, 2017



Revocation Overview

- Consistent with a renewal evaluation, a revocation recommendation is based on an evaluation of same three domains
 - Academic success, organizational compliance and financial health
- CSO's revocation recommendation is based on the collection, evaluation, and synthesis of evidence from the following sources:
 - Charter for Khepera
 - Annual submissions from Charter School per reporting requirements
 - 2015 and 2016 Annual Charter Evaluations (ACE)
 - Audited financial statements
 - Khepera self-reported academic data and School Performance Profile (SPP)
 - Written communications from the Charter School
 - Pennsylvania Department of Education subsidy reports and PSERS data
 - Public court filings



Timeline

| Date | Action |
|--------------------------------|---|
| June 2014 | SRC renewed Khepera's Charter with 22 conditions |
| March 31, 2015 | CSO provided written notice to Khepera Board of items outstanding related to renewal conditions; subsequently the CSO met with representatives of Khepera |
| October 6, 2015 | CSO issued formal Notice of Deficiency to Khepera for non- compliance with the Sunshine Act, Ethics Act, Nonprofit Corporation Law, Board's bylaws, Khepera Charter and CSL |
| December 2015 | CSO met with representative of the Khepera Board of Trustees to discuss Notice and outstanding concerns |
| December 2015 – August 2016 | Formal communications with Khepera Board and CSO monitoring continued for the open Notice of Deficiency |
| January 3, 2017 | CSO issued Notice of Deficiency for failure to submit FY16 audit |
| May 18, 2017 | Following a written request to respond to allegations, CSO issued Notice of Deficiency for failure to make PSERS payments |

Recommendation: Revocation

Location: East Tioga

Student Population: 437 students in Kindergarten – Grade 8

(as of May 31, 2017)

| 2015-16SY Enrollment Data | Khepera | District & Charter |
|-----------------------------|---------|--------------------|
| Special Education | 18% | 16% |
| English Language Learners | 0% | 8% |
| Students Living in Poverty* | 53% | 61% |

^{*}School lunch program eligibility

Mission:

"To create exceptional learners and leaders by using culturally responsive methodologies to close the academic achievement gap attributed to race, gender and economic class."

| Grade | # Students |
|-------|------------|
| K | 48 |
| 1 | 45 |
| 2 | 56 |
| 3 | 50 |
| 4 | 52 |
| 5 | 52 |
| 6 | 44 |
| 7 | 47 |
| 8 | 43 |

Academic Success

- Math, ELA and Science proficiency higher than comparison group averages in **0 of 12 instances**
- Math and ELA proficiency rates fell from 2014-15 to 2015-16, 5pp in Math and 7pp in ELA
- State academic growth standard met in only 1 of 8 instances
- Significant evidence of not meeting the growth standard in all subjects in 2014-15
- SPP score below District and charter sector average in 2015-16 (only one year for SPP)
- Did not meet charter goals for attendance, attendance rate below District and charter averages

| | Math | ı – Grades | 3-8 | Reading | /ELA – Gra | des 3-8 | Science | e – Grades 4 | 4 and 8 |
|-------------|---------|------------|---------|---------|------------|---------|---------|--------------|---------|
| School Year | Khepera | District | Charter | Khepera | District | Charter | Khepera | District | Charter |
| 2014-15 | 9.39% | | | 28.57% | | | 28.57% | | |
| 2015-16 | 4.51% | | | 21.81% | | | 29.79% | | |

School's proficiency above
District, Charter or Peer average.

School's proficiency below
District, Charter or Peer average.

| Average Growth Index (AGI) | | | | |
|----------------------------|-------|-------|--------------------|--------------------|
| | Math | ELA | Science Grade 4 | Science Grade 8 |
| 2014-15 | -8.22 | -6.23 | -5.64 | -5.13 |
| 2015-16 | -0.27 | -1.16 | -2.54 | -1.60 |

| School Performance Profile (SPP) | | | | | |
|----------------------------------|---------|-------------------------|------|--|--|
| | Khepera | Khepera District Charte | | | |
| 2014-15 | NA | - | - | | |
| 2015-16 | 46.1 | 52.6 | 56.7 | | |

| Organizational Cor | npliance and Viability |
|-------------------------------------|--|
| English Language Learners (ELLs) | School's ELL policy non-compliant with PDE program requirements; does not have adequate information on instructional models, identification of students, program exit criteria or post-exit monitoring |
| Enrollment | Enrollment materials do not require submission of Home Language Surveys or parent registration statements, both required documents School requires photo identification to enroll |
| Discipline | School's Code of Conduct does not fully comply with requirements in the PA Public School Code, missing hearing and suspension due process rights As renewal condition, School submitted a 12 point Suspension Reduction Plan in 2015 however OSS increased 5pp the next school year (2015-16) In 2015-16, the OSS rate was 23% including 11% of students in K, 9% in Grade 1 and 21% in Grade 2 receiving at least one OSS |
| Board Governance | Board is not compliant with its bylaws including number of members Board does not fully comply with requirements of the Sunshine Act, Ethics Act or Nonprofit Corporation Law SOFI not submitted for 2015 or 2016 to date for any Board members |
| Personnel Requirements | School failed to meet HQT requirements in 2014-15 and 2015-16 School failed to meet teacher certification requirements in 2014-15 |
| Timely Reporting | School failed to submit to PDE or CSO complete Annual Report for 2015-16 School has not yet submitted either FY15 or FY16 financial audits |

Financial Health and Sustainability¹ School has failed to make required payments to PSERS; PDE has withheld \$1,243,514 in FY16 and FY17 to date from District for these PSERS delinquencies School has not timely submitted work reports to PSERS since at least October 2016 • School has not remitted withheld employee contributions to PSERS since **Fiscal Management** at least February 2016 • Khepera is in default for its lease at 926 W Sedgley Ave; the landlord has filed for Confessions of Judgement for possession of the property and monies owed totaling \$87,346.18 as of May 25, 2017 Khepera violated the CSL by knowingly allowing its employee health insurance to lapse for the full month of December 2016

¹ Financial metrics were not evaluated by CSO for FY15 and FY16 as Khepera has not submitted any financial audits for this charter term.