



Brighter Choice

CHARTER ELEMENTARY SCHOOLS

for Boys & Girls

July 30, 2018



Dear [REDACTED]:

The Board of Directors and school leadership has reviewed the final Renewal Site Visit Report for Brighter Choice Charter School for Boys received on May 29, 2018. Accountability is one of the hallmarks of a charter school and it pushes us toward our goal of providing the best educational opportunities to students and families. We appreciated your review of our school through the NYSED Charter School Performance Framework. We are grateful for: the opportunity provided to showcase the work being done to serve our scholars and community; your team's availability for ongoing conversations; and our continued partnership with the Charter School Office (CSO) to provide the families of Albany and the greater Capital Region a tuition-free, single gender educational option.

We agree with your team's analysis that the school is doing a good job implementing its core mission, and that there are items that can be improved to move school outcomes from good to great. Priority takeaways from the report include: student performance (continuing to improve academic outcomes); enrollment, retention, and recruitment (continuing to increase overall population of ELL and SWD scholars); and Board governance, capacity and legal compliance.

Upon receipt of the draft report in February 2017 and subsequent conversation with the Director of the Charter School Office, the school began implementing plans to address these priority areas. The school has increased investment into academic support for SY2019 by adding an additional instructional coach position, and has taken steps to further refine curriculum based upon internal and external standardized assessments to better student performance outcomes. The school continues to use a two-pronged approach to increase enrollment of ELL and SWD scholars including advancing marketing and outreach efforts, and actively working with the CSO to create a system of weighting

Phone: [REDACTED]

www.brighterchoice.org/Boys

within the admissions policy. In addition, the school continues to increase program capacity for ELL and SWD populations by participating in local and regional trainings (e.g. ELL roundtable through CASDA), revising internal processes (e.g. 504), adding key personnel (e.g. additional school counselor), and introducing research-based interventions aligned with local CSE suggestions. The Board of Trustees has made compliance a top priority and has adopted software designed to support record-keeping and help ensure OML compliance, as well as a designated board clerk to support the Board of Trustees and ensure compliance. In addition, the Board has worked actively to address capacity- both through new member recruitment and targeted board development training.

We also appreciate the opportunity to be part of the process by responding to the draft and final report. The school submitted several corrections following the issuance of the draft report on February 2, 2018. Some changes were made by the CSO, and others were not addressed. After review of the final Renewal Site Visit Report for BCCS, we have prepared the following responses.

Student Performance

On page 10, paragraph 2 of the report the CSO states that “comparisons for the ED population to 2014-2015 and 2015-2016 may not be accurate due to reporting errors by the school.” As explained during site visit, reporting errors did exist due to a misunderstanding of federal and state regulations regarding the school’s ability to gather income information from scholars who were not identified in the state direct certification process. Due to changing requirements in Child Nutrition, the school did not collect FRL status via paper copies, and thus underreported the amount of ED scholars attending the school. The school took a conservative approach in gathering information to avoid jeopardizing compliance and funding of food program. We recognize and agree that reporting of special populations must be accurate, and the issue was fully rectified prior to the 2017-18 school year.

Teaching and Learning

On page 14, paragraph 3 of the report the CSO states that “teachers use released items from the New York State tests to develop interim assessments, which are administered two to three times per year.” This is inaccurate as teachers do not develop the interim assessments. Rather, released items from the New York State tests are used to develop interim assessments, which are administered two to three times per year in order to: 1) assess for mastery of standards taught, and 2) provide students with experience in the format and design of the state tests. Teachers support the test creation process by reviewing and providing feedback on interim assessments.

Board Oversight and Governance

On page 20, paragraph 2 of the report the CSO states that the “BCCS Board of Trustees continues to struggle to recruit members to the board with a broad range of expertise who are representative of the school community.” The BCCS Board of Trustees current members have diverse professional experience and expertise including: elementary and postsecondary educational policy; legislative representative for secondary institution; administrator and teacher at single gender institution; certified public accountant; human resource executive; community organizer; elementary teacher through Teach for America; and; law enforcement. As noted above, the board, through self-assessment and desire to expand capacity, is seeking to add additional quality members to ensure quorum is present at all meetings. A candidate with legal expertise is currently progressing through the process. In addition, although two former BCCS parents serve on the Board of Trustees, the board is actively looking to add current parents. Lastly, 66% of trustees reside in Albany or Troy, and trustees had a total of 5 children attend BCCS. We feel the Trustees are representative of the school community while acknowledging a desire for current parent representatives.

On page 21, paragraph 4 the CSO states that “recently, the board began the process to update its admission policy to incorporate preferences for SWDs and ELLs, two populations that have been consistently under-enrolled at the BCCS...SED is working with the board on approval of this policy.”

The process of updating the admissions policy began in November 2015. As discussed in our meeting with CSO on July 9, 2018, the school has concerns about the process that has been underway for thirty- three months. Understanding the challenges that come with transition of staff, BCCS has received inconsistent feedback from CSO over the past (nearly) three years, most recently being informed, for the first time over the lengthy process, that a preference is unpermitted.

The school is committed to finding a solution and will work with CSO to introduce a revision focused on weighting in lieu of a preference. The school also requests that the CSO revisit material change approved by Regents in April 2015 to determine if admissions policy was confirmed.

Mission and Key Design Elements

On page 25, paragraph 1 of the report the CSO states that “While school leadership and the board appeared unaware that the mission and key design elements submitted with the renewal application were not the ones submitted to and approved by the Board of Regents with its last renewal in 2014, the school had been adhering to these design changes as a part of the school’s normal operations. The mission and key design elements were reflected in the team’s meetings with stakeholders and can be evidenced in the other benchmarks. After the site visit, the school submitted a letter to the CSO

clarifying the mission and key design elements the school recognized as being effective for the current and any future charter term.”

We feel that this statement is misleading and contains inaccuracies and misrepresentations. School leadership and the Board were never unaware of the mission or KDEs that drives the school’s instructional program. Due to unfortunate matters of internal turnover within the CSO, the newly appointed team was unaware of past approved revision of KDEs. Documentation was later uncovered to verify this revision and CSO was transparent in communicating this find to the board’s chair and advised about next action step; a letter from school acknowledging a clerical mistake. We followed through with the action step given. The concern here is that the report does not reflect all details surrounding the miscommunication with the KDEs and the shared responsibility between both parties for the confusion.

As a result, we are offering the following revision that we believe would be a more accurate reflection of what transpired:

- The KDEs were revised during the last renewal in 2014-15; communicated to stakeholders; and posted on school’s website.
- The renewal submission document submitted in August 2017 did mistakenly included old KDEs due to a clerical error.
- During visit on 11.08.2017 CSO liaison and consultant informed the school that KDEs on website were incorrect and that no material change had been approved. School leaders uncovered that the clerical error with submitted documents in August 2017 was at root of misunderstanding.
- However, school leadership was under impression that KDEs had been approved in prior renewal process and shared that the Board had voted to approve in 2014, prior to submission of last renewal.
- School leadership was told by CSO liaison there was no formal approval of material change during last renewal, and school leaders were informed that they would need to submit a revision request for a material change.
- School leadership took this interaction to mean that the 2014 renewal did not suffice as approval for material change and declined to proceed with a material change described by CSO liaison.
- Rather the school chose to revise the text on website to original KDEs, and planned to nest revised KDEs within originals. An email was sent to CSO liaison explaining decision.
- In January 2018, the CSO liaison contacted BCCS Board Chair to share that approval of revised KDEs had been uncovered as a material change in 2014-15 as school leaders first asserted, and that a letter from school acknowledging clerical mistake in renewal application was required. Letter was sent on 01.16.2018.

Enrollment, Recruitment, and Retention

Phone:



www.brighterchoice.org/Boys

The school continues to place a high priority on enrolling, recruiting, and retaining special populations. The school is currently meeting 50% of categories prioritized by the CSO. The school recognizes there is more work to complete to ensure all goals are met. The school does take issue with language chosen by CSO to describe school efforts at enrollment, recruitment, and retention.

On page 25, paragraph 2 the CSO states that the “school’s recruiting strategies are like those used in the past with few revisions and do not represent “extensive good faith efforts” as defined in this benchmark.”

We do not agree with this statement. The school has partnered with Brighter Choice Charter School for Girls to make an extensive and concerted effort to recruit SWD, ELLs, and economically disadvantaged students. Each year we layer on to what we have done the prior year – our entire marketing and recruitment strategy is based upon grass-roots efforts that encourage word-of-mouth recommendations in-person and on social media. The schools saw a gain in overall percentage of ELL students from 2016-17 to 2017-18 even with an overall increase in enrollment due to its good faith efforts. The school continues to work with local CSEs and families to identify and service SWDs. Multiple scholars were brought to the CSE in 2017-18. It is disappointing that we held many long conversations regarding our efforts and that this statement is included in the final report.

Legal Compliance

On page 29, paragraph 2 again reflects the issue noted above (see Board Governance and Oversight) regarding the BCCS efforts to amend the admissions policy to add a preference to applications from SWDs and ELLs as originally advised by the CSO. Also as noted above, the process with CSO regarding amendment to the admissions policy has been long, complicated and, at times unclear. As such, BCCS believes how this process is reflected in the report is inaccurate and unfairly described.

On page 28, paragraph 4 the CSO states that “errors were noted on the board roster, student enrollment, staff retention, and after school tuition, among others.” The school did make a mistake on Board Roster and the issue was worked out prior to the CSO visit after CSO liaison identified mistake. The CSO team brought up an issue with staff retention and it was addressed; the CSO was comparing two different reports (one containing only classroom teachers and one containing all staff) and the school leaders clarified. The retention numbers differed and when asked if the report was completed correctly, the CSO liaison was unable to respond. The school is still unclear about any issue with student enrollment and would appreciate feedback to avoid any mistake in the future.

On page 29, paragraph 5 the CSO states that “BCCS Board minutes provide scant information about the motion to be voted and do not document votes for or against the motion.” The school adopted the format directly from a suggestion by the former CSO liaison. Despite this, the school made an immediate adjustment and introduced new format effective February 27, 2018. The new format included all requested information.

Additionally, as noted above, the board has adopted new software that allows for more consistent tracking of meeting actions, minute development and submission.

Thank you for this opportunity to participate in this review process and respond to your findings. While we have concerns with how certain elements and situations are described in the report and would like to ensure continued transparency and consistency in working with CSO on issues of compliance, we fully embrace the broader feedback and message of the renewal report.

We are committed to going from good to great—in service of our scholars.

Sincerely,

Martha Snyder
Chair, Board of Trustees
Brighter Choice Charter Schools

