



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 Girls 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 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

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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 Brighter Choice Charter School for Girls, 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 5 of the report the CSO states "lesson plans or unit outlines were available for most classes for team review." This is inaccurate as lesson plans were available for all classes.

On page 14, paragraph 2 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. This inaccuracy was highlighted in response to the draft report and remained unchanged. The school suggested the CSO include the following accurate statement: 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 21, 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 22, 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.

Organizational Capacity

On page 24, paragraph 2 the CSO states that "in documents provided as part of the renewal application, the school provided written job descriptions for the roles of director of school quality and principal, but did not offer written details on the responsibilities of the assistant principal...also missing from school documents are written descriptions of the responsibilities of other key staff members listed on the organizational chart including the instructional coach, dean of discipline, character education/behavior support, parent coordinator and school counselor.”

It was pointed out to the CSO in our response to draft report that these documents are not missing as they were never requested by the liaison prior, during, or after the site visit. The school submitted all documents included on CSO 2017-18 Renewal Site Visit Protocol form (see below), and additional documents as requested during visit (e.g. Board Report Materials, OML notices).

At least 21 days before the site visit, the school will supply the following documents to the CSO lead:

- a) Renewal Site Visit Workbook*
- b) Current organization chart, including names and titles*
- c) A master school schedule*

- d) Map of school with room numbers and teacher names*
- e) Board materials (roster, minutes, and strategic plan, if applicable)*
- f) Board self-evaluation processes and documents*
- g) Student/family handbook*
- h) Staff handbook and personnel policies*
- i) A list of major assessments*
- j) Teacher and administrator evaluation processes*
- k) Interventions offered at the school*
- l) School-conducted surveys of teachers, parents, and/or students, and/or NYC DOE surveys*
- m) Professional development plans and schedules*
- n) Efforts towards achieving enrollment and retention targets*

The team may request additional documents before, during, or after the site visit.

On page 25, paragraph 2 the CSO states that “because existing data was not providing reliable predictive information about student performance, school leaders explained during the focus group that they began administering the NWEA assessments in reading and math to measure growth toward grade level standards.” It was explained during the visit, and again pointed out to the CSO in our response to draft report that the NWEA was adopted for multiple reasons; one was to have a standardized and normative measure to help us project proficiencies. Internal tools lack the statistical reliability and were never considered predictive, but as measures of mastery or growth. The school never placed false confidence in internal tools with no proven validity.

Enrollment, Recruitment, and Retention

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 27, paragraph 3 the CSO states that “data reporting errors make the 2014-2015 and 2015-2016 academic years difficult to report on reliably.” The school has explained that the under reporting of ED students was due to a misunderstanding, has been rectified, and did not benefit comparisons to similar schools.

On page 28, paragraph 1 the CSO states that “the school also began the process of adding an ELL preference to the lottery, but that has not yet been finalized with SED.” The school has explained the ongoing thirty-three month process of revision to the admissions policy – see Board Oversight and Governance.

On page 28, paragraph 3 the CSO states that “the school continues to use the same strategies that it has used in the past to recruit special populations.” We do not agree with this statement. The school has partnered with BCCSB to make an extensive and concerted effort to recruit SWD, ELLs, and economically disadvantage students. It is disappointing that we held many long

conversations regarding our efforts and that this statement is included in the report. This statement should be revised to read:

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. In 2016-17, two scholars previously denied services were granted IEPs after the school worked to advocate on for their needs.

Legal Compliance

On page 30, 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 amendments 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 31, 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 former liaison. The school made an immediate adjustment and introduced new format effective February 27, 2018. The new format included all requested information.

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 J. Snyder
Chair, Board of Trustees
Brighter Choice Charter Schools