

NAS Amendments

Dear Dan,

First and foremost, thank you for all of your efforts in submitting such a detailed application. Please note that our reflections and questions come from a place of wanting to ensure that the application presented is as comprehensive as possible as the DAC subcommittee looks to make a recommendation to our Board of Education.

Below are some of the comments from staff as they reviewed the application to ensure that it was complete, per our Charter Schools policy 2.1.4. As our departments reviewed each element of the applications, there were some suggested amendments to the application before it is reviewed and scored using the rubric from CDE. (Insert link here)

In addition to the suggestions found below, we would ask that you submit your AEC SPF as soon as you receive it from COE. This will also help the DAC subcommittee review your latest performance data.

In addition to handing you a copy at our September 15 meeting, I have attached the 2017 NAS Thornton SPF to the email. We are very proud of our results.

Thanks again, Dan. Please let me know if you have further questions or

concerns. Best,

Kim

Finance:

Reflection

The FY17-18 adopted budget approved by the Board and posted on their website has the final budget for FY15-16 information. When I pull up their FY15-16 audit, the budget numbers reported do not even come close to those on the budget document. If the starting point in their document is incorrect then it causes me to question the FY17-18 figures.

The NAS Thornton 2017-2018 Adopted Budget contains the Final Budget for 2016-2017 as a starting point on the worksheet. This column is mis-labeled as 2015-2016 Final Budget; however, I have confirmed it is actually the 2016-2017 Final Budget information. We will correct this on the FTA website.

According to CDE's website their membership has fluctuated dramatically over the last few years and over the last three years there has been a continuous decline in their 9th and 10th grade enrollment. Since funding is based on enrollment this could be an issue. At the same time, they do show all required reserves and an unassigned fund balance of over 19% to help them deal with any shifts in enrollment.

Student count for the last few years was:

FY11 - 439

FY12 - 412

FY13 - 393

FY14 - 305

FY15 - 406.5

FY16 - 406

FY17 - 359

There have never been many students enrolled for the 9th and 10th grades at Thornton because our model is designed to help students who have not succeeded in the mainstream schools. Most of these students were still enrolled in mainstream schools in the 9th and 10th grades. We focus on helping these struggling students succeed and most of them are 11th and 12th grade students. Facility issues including two moves in four and one half years created enrollments changes as does the economy due to the age of many NAS-Thornton students.

In appendix L.3:

Section II: Please request that the following item be added:

f.) provide for an annual audit of the financial statements each fiscal year by a qualified third party and make provision for payment of the expenses of conducting the audit.

Section IV (3)

Third paragraph, replace CSI with District (2 places)

Section VII (6)

This section regarding federal grants needs to be re-written to follow accurate 2 CRF part 200 rules. This section is discussing competitive pricing not not-federal contract provisions.

Section VII (8)

Add language to include federal grants and sole sourcing, grant rules are lower than they have identified. (\$3,500 grants)

Section XI (1)

Replace Charter School Institute (CSI) with District. (1 place)

*We have prepared a draft of the Board policy from Appendix L3 with the amendments that you requested. We can take this to our Board in their October meeting for their consideration. The document titled "Draft NAS Finance Policy 09_20_2017" is the proposed amended version of our Finance Policy. This version addresses the noted concerns/additions from Adams 12. All proposed changes are in **red, bolded and underlined** and are as follows:*

Section II – We added language about providing for an annual audit. (See page 2)

Section IV – We replaced "Charter School Institute (CSI)" with "our authorizer" and "the authorizer's". (See page 3)

Section VII (6) – We added language regarding procurement compliance using federal funds. (See page 10)

Section VII (8) – We added language regarding procurement compliance using federal funds. (See page 11)

Section XI (1) – We replaced "Charter School Institute (CSI)" with "Grantor". (See page 17)

Student Performance

Questions:

- 1) Page 6 - **MAP Growth** - CDE has provided two methodologies that could be used to calculate achievement. One method was decried by the Technical Advisory Panel for Longitudinal Growth (TAP). Which method did NAS Thornton use?

The methodology utilized to analyze performance on the NWEA MAP Academic Achievement optional measure submitted for the NAS Thornton AEC SPF follows the definition provided within the CDE Calculation Guidance for AEC Measures (see below).

Of students continuously enrolled for at least 8 weeks and enrolled at the time of both pre- and post-test administrations, the percent increasing at least one grade level between pre- and post-tests of approved alternative assessment.

- 2) Page 6 - **MAP Growth** - The NAS Thornton document states, "... a national percentile ranking of average growth from a national sample of students attending AECs." The methodology COE created did not take into account a national sample, as determination of AECs is a Colorado process. To what national sample is NAS Thornton referring?

Student level average RIT growth will be calculated by grade level and subject area and compared to a national percentile ranking of average RIT growth from a national sample of students attending AECs. Fall to winter, fall to spring, and winter to spring growth will be calculated and growth over the longest testing window will be utilized for final results. A percentile ranking of the 60th percentile or higher will indicate that the school is making successful academic gains with their student population, as compared to a national sample of alternative students.

Rationale for utilization of this methodology and information regarding the comparison population in the national sample are identified in the most current version of the [Calculation Guidance for Alternative Education Campus Measures](#), updated on May 8, 2017, [Revised NWEA MAP Growth Norms for Use as Optional Measure on AEC SPF](#), updated on May 8, 2017 and the [Revised NWEA MAP Fact Sheet](#), updated on May 8, 2017, all which can be found on the CDE AEC Accountability website (<https://www.cde.state.co.us/accountability/stateaccountabilityaec>). Please let us know if you have any further questions regarding this methodology.

- 3) Page 7 - **ACCESS** - What methodology is used to measure growth on ACCESS? Why isn't ACCESS growth data used? As this school serves many Ells, I'd recommend getting ACCESS growth data for as many years as it is available, including 2017 if those data are made available by COE.

The CDE calculates English Language Proficiency (ELP) growth using the same methodology (quantile regression) utilized for the state content assessments. The normative methodology used in calculating student growth percentiles for state required assessment is also appropriate for examining growth on ACCESS.

ACCESS 2.0 was administered online for the first time in January of 2016 with revised speaking and writing rubrics and language domain scoring scales. Additional mode effects, paper vs. online administration, impacted the comparability of scale scores that were received by the state. Consequently, in 2016, CDE made a decision to not release ACCESS growth scores for reporting and accountability purposes. The ACCESS growth scores were substantially different enough that the CDE did not feel they were an accurate representation of student, school, and district growth on ACCESS.

In 2017, CDE worked with WIDA to develop adjusted scale scores that accounted for test mode differences. The timing of this process delayed the release of results to districts and schools. CDE predicts that comparable mode adjusted scale score and growth data for both 2016 and 2017 ACCESS administrations will be released to schools and districts by the end this calendar year.

- 4) Page 9 - **AEC Optional Measures** - As the District is required to submit the AEC Selection of Measures Form, is NAS Thornton willing to have our data analyst verify calculations completed by the NAS Thornton Senior Data Analyst?

Absolutely. Please let us know which data you'd like to review and we will provide the appropriate data files to the Adams 12 data analyst.

- 5) Page 28 - **End of term assessments** - How were these assessments developed and validated to ensure assessment data are being used appropriately?

End of term assessments are developed during monthly PLC time where discipline departments (English language arts, math, etc.,) meet to discuss priority standards, write assessments, and share data from these assessments at the end of term. Common formative assessments are also developed within school data teams regarding problems of practice, which inform NAS department network teams.

- 6) Page 28 - **Formative assessments** - How is this term defined by NAS Thornton? How are the data used for grading and evaluation purposes?

Formative assessments are defined by NAS-Thornton, as a feedback system of procedures and check-ins so teachers can monitor student learning while it is happening in order to improve their teaching so students can improve their learning. They range from daily class check-ins to thrice-yearly administered NWEA MAP test for yearly growth and are continuously developed and administered by NAS-Thornton instructional staff to better understand student progress on Colorado state standard, which inform their instruction and ensures that individual student academic needs are being met. Instructional staff at NAS Thornton use daily formative assessments to check-in on student learning while it is happening. These daily formative assessments of learning (thumbs-up, four corners, metacognitive exit tickets, etc.) inform daily instruction and allow the teacher to pivot if necessary. Formative assessments of this type are of critical importance during block days, when students delve deeply into topics in a 110-minute class. Formative assessments include a range of formal and informal assessment procedures conducted by teachers during the learning process in order to modify teaching and learning activities to improve student learning and outcomes.

- 7) Page 31 - **Under subheading G.3** - Only 22 credits are required for graduation. How will that be reconciled in a district requiring 23 credits for graduation?

Upon enrollment, each student completes a plan for graduation with the counselor, identifying current credits and deficiencies, as well as a discussion about what is necessary to graduate. (Appendix D.2. NAS Thornton Credit Evaluation FINAL). NAS Thornton currently requires 22 credits for graduation as seen in Appendix D.2. The school

will modify the graduation requirements to match the requirements set forth by the authorizing school district with approval of the charter school application by the Adams 12 Board of Education. NAS Thornton will revise graduation requirements to match those of Adams 12 District Policy 6340, adopted January 19, 2014. Additionally, NAS Thornton has already begun the process of ensuring graduates are prepared for changes CDE has imposed of graduation for the class of 2021 changes by implementing programs for competency based verification to be done as part of their school work.

Special Populations

Questions

- What curriculum and resources are there for both ELL and SPED students?

Special Education. Special education and serving exceptional students at NAS-Thornton is an area in which a varied approach occurs, led by a licensed teacher and contract specialists to assist with the provision of specialized services, i.e. school psychologist, and speech language pathology. In addition, modified textbooks from AGS are utilized. easycbm.com is used for progress monitoring in addition to our standard student information system and Alpine.

English Language Development. English language development curriculum is focused the WIDA standards and Common Core. Resources include Edge Common Core curriculum by National Geographic Learning with additions made through the ELD PLC. The Edge emphasis is placed on reading, writing and language with the spoken component of the language being developed and taught by the teachers.

- What professional development will take place in these areas? Including sheltering and scaffolding instruction in the all content areas.

This year, the leadership team at the New America School identified eight academic best practices based on Sheltered Instruction research and ten socioemotional best practices based on the research of trauma-informed classrooms. The eight academic best practices, which teachers are expected to use every day in every class, are a Model Performance Indicator (a WIDA-based learning objective); activating background knowledge; a vocabulary first approach to content; using visuals to supplement every step of the learning process; formative assessment of learning to ascertain what the students are learning and to pivot if necessary; purposeful reading strategies such as annotating; interactive learning and feedback, and sustained silent reading (SSR), which Krashen (1994) notes is a powerful way for ELL students to acquire new vocabulary.

When instructional staff are hired, they sign a Memorandum of Understanding that they will take three Culturally Linguistic and Diverse Education (CLDE) classes within their first three years in order to meet the needs of our ELL students. Classes within approved university programs are acceptable, and NAS has also developed a monthly, in-house CLDE class taught by its teachers who hold a CLDE endorsement. Because Sheltered Strategies and Culturally Responsive Teaching are part of NAS Best Practices, the implementation of the strategies learned in CLDE classes is tracked on teachers' individual tracking sheet by administrators via look-fors and longer observations, and coaching observations.

Because we are a small charter network of three schools, we take advantage of affordable external professional development opportunities when we can to support professional learning for students with IEPs.

- They discuss that support is being provided in a resource room but what would be the specially designed instruction that is being provided?

The school has a continuum of services for IEP students from integration to self-contained classes. The overarching school approach to Special Education students on an IEP is integration into the regular classroom setting. This approach may be accompanied by a Special Education teacher who would support the student and the regular classroom teacher in specific core subjects. However, where integration is not working or to work on specific learning objectives, the school schedules a seminar period as a resource room that the student attend for 1-2 periods per day to obtain targeted support. In the Seminar class (resource room) students with IEPs work on skills and projects aligned to their Individual Career and Academic Plan in addition to academic interventions to accommodate their learning. In their Seminar class, students with IEPs have

access to textbooks modified by AGS and regular progress monitoring using the student information system and easycbm.com. Other inclusions in the resource room are specialized service provision from a school psychologist, speech language pathology, and audiology.

- We need more information about what is going on during the 4 hours of ELL instruction and their access to universal instruction and core content?

To graduate with a high school diploma and become successful in American society, immigrants need excellent English skills. Our ELD teachers focus on reaching students through a variety of techniques and approaches. Teaching is not an isolated activity, but instead focuses on helping students complete their school tasks. This helps in two areas where English learners need practice: academic English and conversational English. Academic English is critical for success in school while conversational English is the language of daily life. Within the four hour intensive Newcomer ELD1 students have a different focus each hour of instruction with the ELD teacher: Word Study & Grammar, Listen & Speaking, Reading, and Writing. ELD1 students take a blended language Math course in which they have bilingual language support for Algebra 1. Other contents, including social studies and science concepts are a part of the curriculum through activities to promote relevancy of learning.

- We need more data about number of students on IEP's that are being served to determine if 1 teacher is enough support?

As of December count 2016-17 NAS-Thornton had 22 students with IEPs. With fluctuating enrollment depending on the quarter the number vary during the school year slightly. The school employs one SPED teacher and contracts with other providers for specialized services like speech language pathology, school psychologist, audiology, and anything else the SPED teacher does not have the background to perform. With contract providers the staffing allocation is greater than one FTE. If the number of students with IEPs increases the school has the capacity to increase FTE allocation for special education.

- What is the process for identification, placement, monitoring and assessment of ELL and SPED students?

English Language Learner identification, placement, monitoring, and assessment

NAS-Thornton uses W-APT for all new students within 30 days of enrollment. Results are then evaluated by a team including the School Assessment Coordinator, English language development teacher, and a guidance counselor. The results of the assessment, a meeting between the counselor and student, and transcript evaluation are used for placement of students in the most appropriate courses. ACCESS tests are administered during the CDE window to any student whose home language survey and English language proficiency level (NEP, LEP, and FEP) requires the assessment for monitoring. NAS-Thornton administers NWEA MAP assessments three times annually to all students which allows baseline determination and growth measurement from fall to winter, winter to spring, and fall to spring. Both reading and language usage allow measurement and monitoring of a student's English language proficiency. In addition, CMAS, PSAT, and SAT are administered to students and provide additional data regarding a student's achievement and growth in English.

Special Education identification, placement, monitoring, and assessment

NAS-Thornton enrolls students with existing Individual Education Plans (IEPs) as the initial source of identification and uses the Multi-tiered System of Support (MTSS) team for referrals for creating new IEPs. Once identified the school's special education teacher and guidance counselor work together to place students in the most appropriate courses. The primary source of academic data for monitoring comes from NWEA MAP assessments once placed. NWEA MAP is administered three times annually creating the opportunity for growth determinations to be made within the school year at multiple points. The school also provide a school psychologist and speech language pathologist currently for students based on their disability and they provide additional data for all stakeholders. Annual meetings to review the IEP with the student and family occur as part of the monitoring process for exceptional students. The special education teacher uses resources including easycbm.com and Alpine to do progress monitoring.

- What is the actual staffing or FTE allocated for related service providers in relation to their population (ratios)?

22:1 FTE Special Education plus two contracted providers for Speech Language Pathology and School Psychologist; 16:1 for English language development 1 (NEP) students

- There is no reference CEIP standards to address needs of Ell's
NAS-Thornton curriculum for English language learners (ELL) is based on WIDA standards given the ACCESS test basis. W-APT is used for placement of ELLs in the school's various classes in which students will study English language development. All classes taught at NAS-Thornton use Mode Performance Indicators (MPIs) as part of daily instructional practices.

ESSA

Can you amend your application to reflect the current law, ESSA, as opposed to NCIB?

Reflections of the current law set forth in ESSA have been incorporated throughout the revised NAS-Thornton application to Adams 12.

Request for more detail:

We will be using the rubric from CDE as our evaluation tool. I would ask that you deeply review the sections around:

- D.2 Educational Programming and Standard: Curriculum
- D.4 Supplemental Programs, specials or electives
- D.5 Professional Development

In addition, if you could please respond to our questions:

Describe how students earn credits?

Grade level and credits earned are distinctly different from each other. Because of the number of students who are over-aged and under-credited most classes at the school are not grade level based with the exception of Seminar classes. Twenty-two credits are required for graduation in addition to completing six hours of community service per year of enrollment and the Individual Career and Academic Plan (ICAP). The grading scale at the school follows:

<i>A</i>	<i>90%-100%</i>
<i>B</i>	<i>80%-89%</i>
<i>C</i>	<i>70%-79%</i>
<i>D</i>	<i>60%-69%</i>
<i>F</i>	<i>0%-59%</i>

All courses must be completed with a passing grade in order to earn the associated credit for the course. Grades are determined in courses by the teacher as a measure of how the students performed in the class with mastery of content material and meeting expectations for learning.

Opportunities for remediation and extra assistance will be outlined for students. If a student fails a course in a quarter, credit recovery software will be available to allow the student to demonstrate missed knowledge/skills. Credit recovery will be available throughout the year so that a student will have an opportunity to make up for missed credits.

NAS-Thornton offers many supplemental programs to support students in both academic and social development. As an alternative education campus one of the most continuous areas of need at the school is credit recovery. Credit recovery options available to students include: Friday school, Summer School, online credit recovery using

OdysseyWare, day and night school classes, and a work for credit program. Friday school and summer school offerings include two math course and one English course each summer with the capacity to have 90 students enrolled in each program. Online credit recovery is accessible to all students and managed by the school's guidance counselors. In addition, concurrent enrollment is available to eligible students at Front Range Community College.

Is this process clear to other high schools if they take these students back in as transfers?

Just like any other High School accepting transfer students, our credits can be transferred into other schools based on the intake discussion and subsequent awarding of credit at that institution. We are available as necessary to clarify content if there are questions. Each credit meets the threshold of CDE time necessary to award credit, and as you can see from our application describing content, our courses are aligned with specific academic outcomes.