

VI.C.

**CONNECTICUT STATE BOARD OF EDUCATION
Hartford**

TO BE PROPOSED:

February 6, 2020

RESOLVED, That the State Board of Education, pursuant to subsection (g) of Section 10-66bb of the Connecticut General Statutes, renews the charter of Elm City College Prep from July 1, 2020, through June 30, 2022, subject to the Commissioner's February 6, 2020, memorandum to the State Board of Education, and directs the Commissioner to take the necessary action.

Approved by a vote of _____, this sixth day of February, Two Thousand Twenty.

Signed: _____
Dr. Miguel A. Cardona, Secretary
State Board of Education

**CONNECTICUT STATE BOARD OF EDUCATION
Hartford**

TO: State Board of Education

FROM: Dr. Miguel A. Cardona, Commissioner of Education

DATE: February 6, 2020

SUBJECT: Renewal of State Charter – Elm City College Preparatory, New Haven

Executive Summary

Introduction

In accordance with subsection (g) of Section 10-66bb of the Connecticut General Statutes (C.G.S.), charters may be renewed, upon application, in accordance with the provisions for the granting of new charters. The State Board of Education (SBE) may renew a charter for a period of up to five years. The SBE makes renewal decisions based on evidence of the following performance standards:

1. *School Performance:* Is the school a successful model resulting in strong student outcomes and a positive school climate?
2. *Stewardship, Governance and Management:* Is the school financially and organizationally healthy and viable?
3. *Student Population:* Is the school promoting equity by effectively attracting, enrolling and retaining students, particularly among targeted populations?
4. *Legal Compliance:* Is the school acting in compliance with applicable laws and regulations?

The Connecticut State Department of Education (CSDE) and the SBE carefully evaluate qualitative and quantitative evidence, and longitudinal data aligned to the four performance standards outlined above when making charter renewal decisions. The charter performance framework drives the CSDE's charter school accountability systems and processes, including initial approval decisions, annual monitoring and renewal determinations. From inception to renewal, charter schools must abide by the CSDE's charter school accountability procedures and performance framework. Charter monitoring takes place through annual reporting, meetings, correspondence and site visits, as appropriate. In accordance with C.G.S. § 10-66bb(g), a charter may be renewed upon application, if the charter school has demonstrated satisfactory performance relative to the four performance standards.

History/Background

Elm City College Preparatory (ECCP) opened in the fall of 2004 and is completing its sixteenth year in operation. The latest CSDE audited student enrollment data from 2018-19 reported 756 students in Grades K-12 with 100 percent residing in New Haven (the host district). ECCP has a maximum approved student enrollment of 765 seats. Table 1, on page 14, of the attached Charter Renewal Report provides 2018-19 student enrollment and demographic data. Seventy-one percent of ECCP students qualify for free or reduced price meals and 7.9 percent of the students receive special education services. The mission of ECCP is to “deliver on the promise of equal educational opportunity for all of America’s children.”

Charter Renewal Process

Application for Renewal of Charter: The CSDE accepted an application for the renewal of ECCP’s charter on September 6, 2019. The application detailed the charter school’s progress, operations, and achievement in relation to the CSDE’s charter school performance standards: (a) school performance; (b) stewardship, governance and management; (c) student population; and (d) legal compliance. ECCP submitted data and evidence to substantiate the charter school’s written responses.

A renewal team comprised of CSDE staff with expertise in curriculum, assessments, special education, English Learners (ELs), school management, finance, and school governance reviewed the renewal application and requested clarification and additional information, where necessary.

Renewal Site Visit: On October 8, 2019, the CSDE renewal team conducted an on-site visit at ECCP. The purpose of the on-site visit was to observe ECCP’s programs, policies, practices, and procedures to assess their efficacy and fidelity to the school’s charter and aligned operating systems. Evidence was collected through the on-site visit observations, document reviews, interviews, and focus groups. The team spoke with board members, administrators, staff, parents, and community members. The team used this process to ensure that the school is functioning in compliance with the law and the school’s mission. The team verified the responses detailed in the renewal application regarding compliance with the law and the CSDE’s performance framework and accountability plan.

Invitation for Written Comment: The CSDE solicited written comments on the renewal of ECCP from the Superintendent of New Haven Public Schools and from contiguous school districts: East Haven, Hamden, North Haven, Orange, West Haven and Woodbridge. The CSDE received a letter from Mr. Robert F. Gilbert, Superintendent, Woodbridge School District (see Attachment A) which provided no reason or comment that reflects poorly on the school. The CSDE received no letters against the renewal of the school’s charter.

Public Hearing: Allan B. Taylor, Chairperson of the SBE, and CSDE staff held a public hearing on October 24, 2019, in the city of New Haven, and heard from individuals on the potential charter renewal of ECCP and the impact it is having on the community. Public hearing participants included members of the ECCP community, family members, students, school staff and community members. Over 61 individuals attended the October 24, 2019, renewal public hearing, and 25 individuals offered testimony supporting the school's efforts and the renewal of its charter. One parent expressed concerns regarding the culture and climate and the lack of responsiveness by the school and subsequently withdrew the child from the school.

Site Visit Findings

The most recent available data and information contained in the Charter Renewal Report (beginning on page 4) including the Next Generation Accountability Report 2017-18 (pages 7 and 8), indicates ECCP's performance according to the four performance standards. The report highlights school strengths and areas for continued growth.

Strengths include:

- No significant findings, conditions, or internal weaknesses were uncovered in ECCP's last two certified financial audits.
- The school demonstrates strong community support as evidenced by testimony provided by individuals at the public hearing and interviews with parents during the site visit.
- ECCP's website and Governing Board documents demonstrate that the Governing Board meetings are open and accessible to the public.
- ECCP's 2018-19 school culture and climate data reports a chronic absenteeism rate of 9.1 percent which is below state rate of 10.4 percent. The school's 2018-19 average daily attendance rate of 95.8 percent is above the CSDE's goal of 95 percent.
- ECCP's 2017-18 Accountability Index of 82.3 percent is above average the state average of 74.9 percent.
- The school has exceeded the state testing participation rate of 95 percent in all areas tested for all students and high needs students over the last three testing periods.
- The 2018-19 Smarter Balanced percentage of ECCP students achieving at or above proficiency (level 3 and 4) in ELA for all students, (Table 4), is 59.4 percent, 25.0 percentage points above New Haven's 34.4 percent, the host district, and 3.7 percentage points above the state's 55.7 percent.
- The 2018-19 Smarter Balanced percentage of ECCP students achieving at or above proficiency (level 3 and 4) in mathematics for all students, (Table 4) is 54.5 percent, 32.0 percentage points above New Haven's 22.5 percent, the host district, and 6.4 percentage points above the state's 48.1 percent.
- The 2018-19 Smarter Balanced percentage of ECCP students achieving at or above proficiency (level 3 and 4) in ELA for students in Grades 3-8, (Table 4) exceeded New Haven, the host district, and Grades 4, 5 and 7 exceeded the state.
- The 2018-19 Smarter Balanced percentage of ECCP students achieving at or above proficiency (level 3 and 4) in mathematics for students in Grades 3-8, (Table 4), exceeded New Haven, the host district, and Grades 3, 4, 6, 7 and 8 exceeded the state.
- The 2018-19 Smarter Balanced Assessment average percentage of growth target achieved of ECCP students in ELA is 64.9 percent for all students, exceeding the state's 59.9 percent.
- ECCP's 4-year Graduation – All Students (2018 Cohort) rate of 96.2 percent is above the state average of 88.3 percent.

Areas of Concern:

- While ECCP's suspension rate has trended downward over the last three years from 16.4 percent in 2016-17 to 11.8 percent in 2018-19, it is above the state rate of 6.7 percent and New Haven's rate of 6.9 percent.
- Pursuant to Section 10-17e-j of the C.G.S., ECCP is required to provide a transitional bilingual program to eligible ELs. The school provides transitional bilingual supports afterschool, outside the school day servicing a portion of the eligible EL population. Furthermore, it was determined that no transportation is offered to the students. The program's existence outside the school day is not a permissible replacement for bilingual programming. The transitional bilingual program must be part of the school's core programming.
- ECCP is not in compliance with the teacher certification statute. A condition of ECCP's charter renewal of March 1, 2017, required the school to comply with the teacher certification statute by October 31, 2019. ECCP provided updates to SBE on January 3, 2018 and February 6, 2019 on its progress. A report as of December 30, 2019, shows 94.1 percent of staff to be in compliance with certification. It is the responsibility of the school to take steps to ensure that 100 percent of the staff holds appropriate certificates, permits, or authorizations for their positions. Current legislation requires that at least 50 percent of educators serving in a charter school must hold a valid certificate (Initial, Provisional, or Professional Certificate) and the remaining 50 percent may hold other interim certificates, permits or authorizations. Of the 67 staff requiring certification, 32 staff members or 47.8 percent hold a valid certificate, and 31 or 46.3 percent hold other permits or authorizations.
- ECCP is not in compliance with TEAM. ECCP is required to implement the Teacher Education and Mentoring (TEAM) Program with fidelity to the statutory requirements by ensuring 100 percent of beginning teachers complete the TEAM program by their completion deadline date (within three years of hire) to be eligible to advance their certificate. Beginning teachers must be assigned a mentor within 30 days of hire, receive and log a minimum of 20 hours of mentoring and complete two modules per year. Mentors may be assigned no more than two beginning teachers unless granted prior permission by the CSDE. On January 3, 2018, and February 6, 2019, ECCP provided updates to the SBE on its progress to bring its beginning teachers into TEAM compliance.

As of November 14, 2019, seven out of eight beginning teachers have been assigned a mentor. Due to the insufficient number of AF mentors for the 2019-20 school year, AF requested special permission for mentors to mentor more than two beginning teachers. Two mentors have been assigned three beginning teachers. Two beginning teachers have not begun TEAM, user accounts have not been created for those individuals. Only one beginning teacher has received any mentoring this year – 35 minutes of mentoring. Two teachers have a completion deadline date of September 1, 2020. One of the two has all five TEAM instructional modules to complete. The other teacher has two instructional modules to complete.

Charter Renewal Recommendation

ECCP is financially and organizationally stable. ECCP's average daily attendance rate exceeded the state goal of 95 percent and its chronic absenteeism rate is below the state average. Suspension rates are above the state average by 5.1 percentage points, but they have trended downward each of the last three years. As previously mentioned, however, the school is not in compliance with TEAM or teacher certification legislation. Based on ECCP's long-standing inability to comply with teacher certification legislation, the CSDE recommends that the SBE renew the school's charter for a period of two years, with the knowledge that pursuant to subsection (h) of Sec.10-66bb(h), of the C.G.S., the Commissioner will place ECCP on probation and require the charter school to file a corrective action plan within the statutorily-prescribed timelines.

While the Commissioner recommends the renewal of ECCP from July 1, 2020, through June 30, 2022, the Commissioner's letter of probation, separate from this action, will include the following provisions:

1. By February 11, 2020, as required by C.G.S. § 10-66bb(h), the Commissioner shall provide written notice to ECCP of the length and reasons for probation.
2. By February 11, 2020, as required by C.G.S. § 10-66bb(h), the Commissioner shall notify parents and guardians of students attending the school of the probationary status and the reasons for such status.
3. By March 6, 2020, ECCP shall submit a plan for the CSDE review and approval to bring its staff into certification compliance by October 31, 2020 by: (a) ensuring staff responsible for hiring clearly understand the certification requirements of each position; (b) providing a clear pathway and support to certification with established milestones and timelines; (c) including monitoring and interventions for non-compliance; and (d) reporting of non-compliant staff including certification targets, schedules, action steps, including responsible school staff, on August 3, 2020 to ensure compliance. The plan shall be developed in consultation with the CSDE's Talent Office. ECCP shall implement the corrective actions within thirty days following the Commissioner's acceptance of the plan.
4. By March 6, 2020, ECCP shall submit a plan for the CSDE review and approval to implement the Teacher Education and Mentoring (TEAM) Program with fidelity to the statutory requirements by ensuring 100 percent of beginning teachers complete the TEAM program by their completion deadline date (within three years of hire) to be eligible to advance their certificate by October 31, 2020 by: (a) ensuring 100 percent of new beginning teachers are assigned a mentor within 30 days of hire; (b) matching no more than two beginning teachers to each mentor; and (c) requiring beginning teachers to complete two modules each year and log a minimum of 20 mentor hours.

5. By March 6, 2020, ECCP shall submit a plan for the CSDE review and approval to provide a transitional bilingual program to all eligible English Learners (ELs) within the core programming of the school day with no impact on student transportation.
6. In the fall of 2020, ECCP will be required to appear before the SBE to provide an update on the status of teacher certification compliance, TEAM and transitional bilingual program.
7. In the spring of 2021, pending State Board of Education notification, the Commissioner will evaluate ECCP's satisfaction of the forgoing issues and determine the status of ECCP's probation.

The CSDE will notify Elm City College Preparatory of action taken by the SBE following its meeting on February 6, 2020. The school will be advised to take advantage of relevant technical assistance opportunities designed to improve its educational program. The CSDE will conduct follow-up visits to ensure that Elm City College Preparatory addressed the issues raised in this memorandum.

Prepared by: Robert E. Kelly, Charter School Program Manager
Turnaround Office

Reviewed by: Lisa Lamenzo, Bureau Chief
Turnaround Office

Approved by: Desi D. Nesmith, Deputy Commissioner

CHARTER RENEWAL REPORT | 2020

Charter School Information:		
Charter School Name:	Elm City College Preparatory	
School Director:	Andrew Poole	
School Board Chairperson:	Richard Ferguson	
Location (City/Town):	New Haven	
Rating Key:		
Meets	The school demonstrates effective policies and practices, resulting in positive outcomes.	
Pending Action	The school requires minor modifications to its policies and/or practices. The school is taking satisfactory measures to remedy and address these issues in a timely manner.	
Does Not Meet	The schools falls below performance expectations with significant concerns noted, which require immediate attention and intervention.	
Standard 1: School Performance Indicators	Points/Max	% Points Earned
Accountability Index:	946.0/1150	82.3
Notes and Evidence:		
<p>The 2017-18 ECCP Accountability Index of 82.3 percent is above average when compared to the state school Accountability Index of 74.9. Schools that meet Standard 1: are schools earning an accountability index from 85 to 100 percent (Category 1) and schools earning an accountability index from 70 to 84.9 (Category 2). ECCP's Accountability Index score of 82.3 places its performance in Category 2, which earns a meets for Standard 1. ECCP's 2017-18 Next Generation Accountability Report shown in detail on the next page.</p>		

Next Generation Accountability, 2017-18
 Elm City College Preparatory School (Grades: K-12)
 School Category: 2

Indicator	Index/Rate	Target	Points Earned	Max Points	% Points Earned	State Average % Points Earned
1a. ELA Performance Index - All Students	70.3	75	46.9	50	93.7	90.1
1b. ELA Performance Index - High Needs Students	70.3	75	46.9	50	93.7	76.7
1c. Math Performance Index - All Students	66.0	75	44.0	50	88.0	83.6
1d. Math Performance Index - High Needs Students	66.0	75	44.0	50	88.0	69.3
1e. Science Performance Index - All Students	.	75
1f. Science Performance Index - High Needs Students	.	75
2a. ELA Academic Growth - All Students	64.3%	100%	64.3	100	64.3	60.7
2b. ELA Academic Growth - High Needs Students	64.3%	100%	64.3	100	64.3	55.6
2c. Math Academic Growth - All Students	71.7%	100%	71.7	100	71.7	61.9
2d. Math Academic Growth - High Needs Students	71.7%	100%	71.7	100	71.7	55.4
4a. Chronic Absenteeism - All Students	6.7%	<=5%	46.6	50	93.1	77.2
4b. Chronic Absenteeism - High Needs Students	6.8%	<=5%	46.3	50	92.6	53.6
5. Preparation for CCR - Percent Taking Courses	100.0%	75%	50.0	50	100.0	99.7
6. Preparation for CCR - Percent Passing Exams	53.4%	75%	35.6	50	71.3	59.7
7. On-track to High School Graduation	96.4%	94%	50.0	50	100.0	93.1
8. 4-year Graduation: All Students (2017 Cohort)	85.7%	94%	91.2	100	91.2	93.5
9. 6-year Graduation: High Needs Students (2015 Cohort)	.	94%	.	.	.	87.0
10. Postsecondary Entrance (Graduating Class 2017)	87.5%	75%	100.0	100	100.0	94.5
11. Physical Fitness (estimated participation rate = 90.3%)	33.8%	75%	22.5	50	45.1	66.8
12. Arts Access	63.8%	60%	50.0	50	100.0	85.3
Accountability Index	.		946.0	1150	82.3	74.9

Gap Indicators

Indicator	Non-High Needs Rate	High Needs Rate	Size of Gap	State Gap Mean +1 Standard Deviation	Is Gap an Outlier?
ELA Performance Index Gap	.	70.3	.	15.6	
Math Performance Index Gap	.	66.0	.	17.7	
Science Performance Index Gap	
Graduation Rate Gap (2015 Cohort)	

If the Non-High Needs Rate exceeds the ultimate target (75 for Performance Index and 94% for Graduation Rate), the ultimate target is used for gap calculations.
 If the size of the gap exceeds the state mean gap plus one standard deviation, the gap is an outlier.

Assessment Participation Rates

Indicator	Participation Rate (%)
ELA - All Students	99.5
ELA - High Needs Students	99.5
Math - All Students	99.3
Math - High Needs Students	99.3
Science - All Students	97.4
Science - High Needs Students	97.4

Minimum participation standard is 95%.

Standard 2: Stewardship, Governance and Management Indicators:	Rating
2.1. Fiscal Management	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
2.2. Financial Reporting and Compliance	<input type="checkbox"/> M <input checked="" type="checkbox"/> PA <input type="checkbox"/> DNM
2.3. Financial Viability	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
2.4. Governance and Management	<input type="checkbox"/> M <input checked="" type="checkbox"/> PA <input type="checkbox"/> DNM
2.5. School Facility	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
Notes and Evidence:	
<ul style="list-style-type: none"> Indicator 2.1: CSDE site visit staff reviewed ECCP’s last two certified financial audits and uncovered no significant findings, conditions or internal control weakness. Indicator 2.2: CSDE site visit staff reviewed ECCP’s last two certified financial audits, Accounting Policies and Procedures Manual (APPM) and budgets, and interviewed the school principals, Director of Operations and governing board members. Staff from the CSDE’s Office of Internal Audit determined the APPM contains the standard sections of an APPM. However the APPM requires some minor amendments in the areas of credit card review. The ECCP Board of Directors and its Finance and Audit Committee have specific roles and responsibilities for financial oversight of the school. However, the roles and responsibilities are not formally documented in a Board Policies and Procedures Manual (BPPM) to ensure consistency and continuity. The missing items include the monthly credit card review, annual review of school policy by governing board, charter school management organization (CMO) evaluation in compliance with the CMO contract and response to audit findings. The reviewers determined ECCP completed on-time submission of certified audits and annual budgets. The school is in the process of amending the APPM and developing the BPPM. Indicator 2.3: Staff from CSDE’s Office of Internal Audit reviewed ECCP’s latest certified financial audit and determined ECCP’s debt to asset ratio (total liabilities/total assets), total margin (net income/revenue), current asset ratio (current assets / current liabilities), and debt service coverage ratio (net income + depreciation + interest expense) / (principal + interest payments) meets or exceeds the ranges recommended by the National Association of Charter School Authorizers (NACSA), signifying overall financial health. Indicator 2.4: A review of ECCP’s school policies regarding anti-nepotism and conflict of interest were found to be in compliance with the CSDE administrative oversight guidelines. ECCP’s policies and procedures regarding background checks of staff and board members, open board meetings and board membership training were reviewed and found to comply with state and federal laws, rules and regulations. This finding is supported by a review of background checks, board training records, school website and governing board meeting minutes. A review of ECCP’s Bylaws require some amendments to be compliant with state statute. The school is in the process of amending the Bylaws to comply. Indicator 2.5: As evidenced during the site visit, ECCP has a safe and well-maintained school facilities to support teaching and learning. The facility has been approved by the New Haven Fire Marshal and Building Department. The school has proof of property insurance. 	

Standard 3: Student Population Indicators	Rating
3.1. Recruitment and Enrollment Process	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
3.2. Waitlist and Enrollment Data	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
3.3. Demographic Representation	<input type="checkbox"/> M <input checked="" type="checkbox"/> PA <input type="checkbox"/> DNM
3.4. Family and Community Support	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
3.5. School Culture and Climate	<input type="checkbox"/> M <input checked="" type="checkbox"/> PA <input type="checkbox"/> DNM

Notes and Evidence:

- Indicator 3.1:** The latest CSDE audited student enrollment data from 2018-19 reported 756 students in Grades K-12 with 100 percent residing in New Haven (the host district). A review of the school’s student enrollment policy, and interviews with school staff, board members and parents determined all students are admitted through a blind lottery.
- Indicator 3.2:** A review of ECCP’s waitlist information in Table 3 on page 14 determined it maintains a waitlist of families beyond the available number of seats. In 2019-20, 349 students were on the waiting list. The waitlist has included more than 348 students each year for the past three years.
- Indicator 3.3:** A review of ECCP’s 2018-19 Public School Information System (PSIS) data reports students of color represent 98.0 percent of ECCP’s student population and 71.0 percent of the students qualify for free and reduced-price meals. The percentage of special education students at ECCP is 7.9 percent. ECCP’s EL population is 5.4 percent compared to New Haven’s 16.6 percent. To better reflect the demographics of the surrounding community, the school must seek to enroll more students who are English learners and pursuant to Connecticut General Statute Section 10-17e-j, provide a transitional bilingual program to eligible ELs.
- Indicator 3.4:** ECCP demonstrates strong community support, as evidenced by parent interviews conducted by the CSDE renewal team. Parent focus groups described the communication between the school and families as sufficient. Currently, parents receive weekly reports that detail student academics and behavior. Parents expressed support for what they perceive is a rigorous educational model that addresses their child’s educational needs. Parents indicated they were satisfied with the school’s commitment to serving students with diverse needs. Students testified during the public hearing that they are happy with the educational choice opportunity the school provides. Over 61 individuals attended the October 24, 2019, renewal public hearing, and 25 individuals offered testimony supporting the school’s efforts and the renewal of its charter. One parent spoke out against the school, expressing concerns regarding the culture and climate of ECCP.
- Indicator 3.5:** School culture and climate policies reviewed by CSDE site visit staff were clear and concise. Classroom observations revealed consistent implementation of behavior management model. A review of ECCP’s 2018-19 school culture and climate data reports a chronic absenteeism rate of 9.1 percent which is below the state rate of 10.4 percent, and an average daily attendance rate of 95.8 percent which is above the CSDE’s goal of 95 percent. ECCP’s 2018-19 student suspension rate of 11.8 percent is above the state rate of 6.7 percent and New Haven’s rate of 6.9 percent. The suspension rate is trending downward from the 2016-17 suspension rate of 16.4 percent. The school has been implementing a corrective action plan it developed in the spring of 2017, to improve school culture and climate and lower student suspensions. ECCP should continue to refine efforts to improve the suspension rate.

Standard 4: Legal Compliance Indicators	Rating
4.1. Open Meetings/Information Management	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
4.2. Students with Disabilities	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
4.3. English Learners	<input type="checkbox"/> M <input type="checkbox"/> PA <input checked="" type="checkbox"/> DNM
4.4. Rights of Students	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
4.5. Teacher/Staff Credentials	<input type="checkbox"/> M <input type="checkbox"/> PA <input checked="" type="checkbox"/> DNM
4.6. Employee Rights	<input checked="" type="checkbox"/> M <input type="checkbox"/> PA <input type="checkbox"/> DNM
Notes and Evidence:	
<ul style="list-style-type: none"> Indicator 4.1: The school website and Governing Board documents demonstrate that Governing Board meetings are open and accessible to the public. The Governing Board meeting schedule for the year and meeting agendas are posted on the school’s website. Education records and testing data are secured in locked file cabinets in the school director’s office. Indicator 4.2: A review of ECCP’s 2018-19 Public School Information System (PSIS) data reports the percentage of special education students at the school as 7.9 percent. ECCP provides special education supports and services within the least restrictive environment continuum as determined by the identified student’s Individualized Education Plan (IEP). To address student needs, ECCP uses a co-teaching model in all grades. Classes with students with IEPs are co-taught by a special education teacher and a general education teacher. When applicable paraeducator support is provided to classrooms through general education. Other instructional models include push-in and small group instruction within the class. The school makes available speech, language and psychological services to meet student needs. Social workers are available to meet the social service needs of students. ECCP verifies related services through a sign-in system and emails are sent to providers when services are missed to adjust services to ensure compliance. <p>Planning and Placement Team (PPT) meetings are conducted by the School District in which the student resides and held at ECCP. This allows for more robust participation of the school’s staff. Parents/Guardians, students (as appropriate) and required PPT members from the host district and ECCP are invited to participate in the meeting. The PPT develops, reviews, and revises the IEP based upon the student’s individualized needs.</p> <p>ECCP’s special education staff expressed an interest in technical assistance targeting co-teaching and instructional strategies for students with ADHD. The school is currently in the process of arranging training in these areas with the State Education Resource Center (SERC) facilitated by the CSDE Bureau of Special Education.</p> <p>Student education files are kept in locked file cabinets. There were no access logs in the folders and the special education staff were asked to add them to the files.</p>	

- **Indicator 4.3:** A review of ECCP's 2018-19 Public School Information System (PSIS) data reports the percentage of students identified as ELs at the school as 5.4 percent. The school has developed an EL plan. The plan contains sections including: EL identification, serving EL students, parent communication and rights, annual assessment and exit criteria. The school has added the LAS Links annual English language proficiency test to the assessment calendar. The EL plan is part of ECCP's Special Services Playbook (special education policy) and as a subsection contains the school's EL plan. For clarity about EL services offered by the school, ECCP has been asked by the CSDE to consider creating a standalone EL document.

Pursuant to Connecticut General Statute Section 10-17e-j, ECCP is mandated to provide a transitional bilingual program to eligible ELs. As ECCP has done, the school must send a letter to the parent/guardian of all eligible students informing them of their right to receive these services. If one or more parents request the service for their child, a bilingual program must be provided for those ELs. In the event that a certified bilingual staff person is not hired, the school must send a letter to the Commissioner of Education requesting a certified TESOL teacher be used in lieu of a bilingual teacher and describing how native language support will be provided. While the school's current letter on file with the CSDE includes TESOL certified staff to support students, the native language supports are provided afterschool, outside the school day servicing a portion of the EL population. Furthermore, it was confirmed that no transportation was offered to these students, limiting accessibility to this program. The program's existence outside the school day is not a permissible replacement for bilingual programming. The transitional bilingual program must be part of the school's core programming.

- **Indicator 4.4:** ECCP student rights policies and procedures include admissions, handling of student information, due process protections and state nondiscrimination laws. Interviews with parents and staff at the school supported the proper implementation and use of the policies.
- **Indicator 4.5:** A condition of ECCP's charter renewal of March 1, 2017, required the school to comply with the teacher certification statute by October 31, 2019. Staff from the CSDE Bureau of Educator Standards and Certification reviewed the state certified staff file and the school's employee roster. A review of ECCP's staff file of December 30, 2019, reports 94.1 percent of staff in compliance with certification. It is the responsibility of the school to take steps to ensure that 100 percent of the staff holds appropriate certificates, permits, or authorizations for their positions. Current legislation requires that at least 50 percent of educators serving in a charter school must hold a valid certificate (Initial, Provisional, or Professional Certificate) and the remaining 50 percent may hold other interim certificates, permits or authorizations. Of the 67 staff members requiring certification, 32 staff or 47.8 percent hold a valid certificate, and 31 staff or 46.3 percent hold other permits or authorizations. Of the four staff out of compliance, some have applications for certification or permits pending and have received letters indicating which credentials are missing in order for the application to be processed.

Of the 50 percent allowed to serve under other certificates, permits or authorizations, legislation also allows for the issuance of a Charter School Educator Permit (CSEP) for no more than 30 percent of the educators serving in a charter school. ECCP currently has 36 percent holding a CSEP. Other options to bring staff into compliance for certification, pending they met criteria for each option, include a Long-Term Substitute Certificate, a Durational Shortage Area permit (DSAP), a Temporary 90-Day Certificate, an Interim Educator Certificate or a Resident Educator Permit.

ECCP is required to implement the Teacher Education and Mentoring (TEAM) Program with fidelity to the statutory requirements by ensuring 100 percent of beginning teachers complete the TEAM program by their completion deadline date (within three years of hire) to be eligible to advance their certificate. Beginning teachers must be assigned a mentor within 30 days of hire, receive and log a minimum of 20 hours of mentoring and complete two modules per year. Mentors may be assigned no more than two beginning teachers unless granted prior permission by the CSDE. On January 3, 2018 and February 6, 2019, ECCP established a corrective action plan and provided updates to SBE to bring its beginning teachers into TEAM compliance. As of November 14, 2019, seven out of eight beginning teachers have been assigned a mentor. Due to the insufficient number of AF mentors for the 2019-20 school year, AF requested special permission for mentors to mentor more than two beginning teachers. Two mentors have been assigned three beginning teachers. Two beginning teachers have not begun TEAM, user accounts have not been created for those individuals. Only one beginning teacher has received any mentoring this year – 35 minutes of mentoring. Two teachers have a completion deadline date of September 1, 2020. One of the two has all five TEAM instructional modules to complete. The other teacher has two instructional modules to complete. ECCP is not in compliance with TEAM.

The Evaluation and Support Plan (EESP) that is currently on file for ECCP was initially submitted for the 2015-16 school year. Since the *Guidelines for Educator Evaluation* were updated in 2017, the school is required to make revisions to align with the *2017 Guidelines*.

The CSDE has requested that ECCP’s Professional Development and Evaluation Committee (PDEC), revise the EESP to align with the *2017 Guidelines* and submit by May 1, 2020.

- **Indicator 4.6:** A review of legal actions brought against ECCP determined that no government agency alleged the violation of any law by the school, or undertaken any investigation of any violation of law by the school.

Prepared by:	Reviewed by:	Approved by:
Robert Kelly Charter School Program Manager	Lisa Lamenzo Turnaround Office, Bureau Chief	Desi D. Nesmith Chief Turnaround Officer

ELM CITY COLLEGE PREPARATORY DATA

Table 1: 2018-19 Student Enrollment and Demographic Information (latest audited student data)

Grades served:	K-12
Total enrollment:	756
Percentage of students qualifying for free or reduced price meals:	71.0
Percentage of special education students:	7.9
Percentage of students with limited English proficiency:	5.4
Percentage American Indian or Alaska Native:	*
Percentage of Asian students:	*
Percentage of Black students:	70.0
Percentage of Hispanic students:	26.1
Percentage of Two or More Races:	1.6
Percentage of Caucasian students:	2.0

*N<=5. Data suppressed to ensure student data privacy.

Table 2: School Culture and Climate Data

Performance Metric:	School 2016-17:	School 2017-18:	School 2018-19:	State 2018-19:
Average daily attendance rate:	95.9%	96.0%	95.8%	
Chronic absenteeism rate:	9.1%	6.7%	9.1%	10.4%
Number of in-school suspensions:	99	136	173	
Number of out-of-school suspensions:	201	250	193	
Suspension rate (% students with 1+ suspension):	16.4%	14.2%	11.8%	6.7%
Number of expulsions:	0	*	*	
Cohort graduation rate (if applicable):	85.7%	96.2%	N/A	N/A
Six Year Adjusted Cohort Graduation Rate (if applicable):	N/A	N/A	N/A	N/A

Table 3: Student Waitlist and Mobility Information

Performance Metric:	2017-18:	2018-19:	2019-20:
Waitlist number:	422	374	349
Number of enrolled students who left during the school year, or who did not re-enroll the next school year and did not complete the highest grade at the school:	12.4	16.1	N/A

ELM CITY COLLEGE PREPARATORY STATE TEST DATA

Table 4:

Scholastic Aptitude Test (SAT) - Percentage of students at level 3 and 4 (met/exceeded)

	School 2017-18	School Average Score	School 2018-19	School Average Score	District 2018-19	District Average Score	State 2018-19	State Average Score
ELA	*	506	*	478	34.3	444	61.6	514
MATH	*	492	*	474	12.1	423	40.6	500

Grades 3-8

Smarter Balanced Assessment - Percentage of students at level 3 and 4 (met/exceeded)

GRADE	ELA				MATH			
	School	School	District	State	School	School	District	State
	2017-18	2018-19	2018-19	2018-19	2017-18	2018-19	2018-19	2018-19
All Grades Combined	62.8	59.4	34.4	55.7	54.8	54.5	22.5	48.1
3	62.5	49.1	30.1	54.3	67.2	59.6	30.6	55.0
4	64.6	64.6	32.3	54.6	*	63.1	21.6	52.5
5	56.3	66.1	35.5	58.1	50.0	43.5	19.6	46.5
6	63.9	54.8	37.6	55.3	54.2	50.0	24.0	45.4
7	54.7	68.9	36.7	56.1	46.9	57.4	20.5	46.1
8	75.9	51.7	33.8	55.8	62.1	53.3	19.4	43.5

Elm City College Preparatory School Next Generation Science Standards Assessment Data

Table 5: Next Generation Science Standards (NGSS)

Assessment-Percentage of students at level 3 and 4 (met/exceeded)

GRADE	School 2018-19	District 2018-19	State 2018-19
All Grades Combined	39.8	26.6	51.2
5	*	31.2	53.6
8	39.0	29.2	52.2
11	*	17.2	47.7

*The data are suppressed to ensure confidentiality.



WOODBIDGE SCHOOL DISTRICT

40 Beecher Road – South
Woodbridge, Connecticut 06525

Robert F. Gilbert – Superintendent

Cheryl Mammen – Special Services Director | Alfred Pullo, Jr. – Director of Business Services/Operations

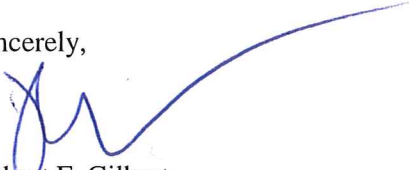
September 27, 2019

Mr. Robert Kelly
Charter School Program Manager
Connecticut State Department of Education
P.O. Box 2219
Hartford, CT 06106

Dear Mr. Kelly:

I am responding to the request from Lisa Lamenzo soliciting comments on the renewal of Elm City College Preparatory School in New Haven. I know of no reason nor can I provide any comments, which reflect poorly on Elm City College Preparatory School. If I can be of further assistance, please do not hesitate to contact me.

Sincerely,



Robert F. Gilbert
Superintendent

RFG/med