

VII.D.

Connecticut State Board of Education Hartford

To Be Proposed:
April 5, 2023

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 Preparatory School from July 1, 2023, through June 30, 2026, subject to the Commissioner's April 5, 2023, memorandum to the State Board of Education, and directs the Commissioner to take the necessary action.

Approved by a vote of _____, this fifth day of April, Two Thousand Twenty-Three.

Signed: _____
Charlene M. Russell-Tucker, Secretary
State Board of Education

**Connecticut State Board of Education
Hartford**

TO: State Board of Education

FROM: Charlene M. Russell-Tucker, Commissioner of Education

DATE: April 5, 2023

SUBJECT: Renewal of State Charter – Elm City College Preparatory School, 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, data submissions, 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

The Elm City College Preparatory School (ECCP) opened in the fall of 2004. The latest CSDE audited student enrollment data from 2022-23 reports 783 students in Grades K-12 with 100 percent residing in New Haven (the host district). ECCP has the maximum approved student enrollment of 765 seats. Though over enrolled, which is allowable per state statute, the school only receives a per-pupil grant based on the maximum approved enrollment of 765. Of these students, 78.3 percent qualify for free or reduced-price meals and 8.9 percent of the students receive special education services. Table 1 on page 17 of the attached Charter Renewal Report provides the latest available audited 2022-23 student enrollment and demographic data. The mission of ECCP is to “prepare our students to deepen their knowledge of self and community, to excel at college, career, and life, and to lead lives of purpose and leadership.”

On February 6, 2020, ECCP received a two-year charter renewal with probation. Conditions stated in the 2020 renewal required ECCP to develop three corrective action plans: 1) to bring its staff into certification compliance by October 31, 2020; 2) to implement the Teacher Education and Mentoring (TEAM) Program with fidelity to the statutory requirements by October 31, 2020; and 3) to provide a transitional bilingual program to all eligible multilingual learners/English learners (MLs/ELs) within the core programming of the school day.

On July 14, 2020, the SBE voted to extend by one year the term of ECCP and each eligible charter school to support schools in adequately addressing issues imposed by the COVID-19 pandemic and to maintain a comprehensive charter renewal process.

On November 19, 2020, representatives of ECCP appeared before the Accountability and Support Committee of the SBE to discuss the school’s progress and update on the status of the three corrective actions plans. On April 8, 2021, then Acting Commissioner of Education Charlene M. Russell-Tucker issued a letter indicating ECCP’s probation expired on February 6, 2021, and that the school was making notable progress in all areas to satisfy its probationary requirements.

Charter Renewal Process

Application for Renewal of Charter: The CSDE accepted an application for the renewal of ECCP’s charter on September 9, 2022. 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 the CSDE staff with expertise in curriculum, assessments, special education, multilingual learners/English learners (MLs/ELs), school management, finance, and school governance reviewed the renewal application and requested clarification and additional information where necessary.

Renewal Site Visit: On November 3, 2022, the CSDE renewal team conducted an onsite visit at ECCP. The purpose of the onsite visit was to observe ECCP 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 onsite visit observations, document reviews, interviews, and focus groups. The team spoke with board members, administrators, staff, students, 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 (NHPS) and from contiguous school districts: East Haven, Hamden, North Haven, Orange, West Haven, and Woodbridge. The CSDE received a letter from Ms. Christine Syriac, Interim 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: Erik Clemons, member of the SBE, and the CSDE staff held a public hearing on January 19, 2023, 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, including members of the governing board, family members, students, graduates, school staff, and community members. Over 30 people attended the public hearing. Seventeen individuals offered testimony supporting the school's efforts and the renewal of the charter. No one spoke out against the renewal of the school's charter.

Review of Documents and Site Visit Findings

The most recent available data and information contained in the Charter Renewal Report and the state student data (beginning on page 9) indicates ECCP's performance according to the four performance standards. The report highlights school strengths and areas for continued growth.

Areas of Strength Include:

- ECCP's Accountability Index scores of 82.3 percent in 2017-18 and 76.1 percent in 2018-19 outperformed the host district and state averages.
- ECCP's English language arts (ELA) Performance Index – All Students has exceeded the host district and state in 2017-18 and 2018-19 and was above the host district and within 4.3 index points of the state in 2021-22.
- ECCP's Mathematics Performance Index – All Students has exceeded the host district and state in 2017-18 and 2018-19.
- ECCP's 2021-22 ELA Academic Growth – All Students has exceeded the host district and the state over the three reporting periods (2017-18, 2018-19, and 2021-22), and has trended up over the three reporting periods (64.3 percent in 2017-18, 64.9 percent in 2018-19, and 68.7 percent in 2021-22).
- ECCP's Mathematics Academic Growth – All Students of 71.7 percent in 2017-18, and 61.2 percent in 2018-19 were above the host district and state or near the state averages.
- ECCP's ELA Performance Index – High Needs Students has exceeded the host district and state over the three reporting periods (2017-18, 2018-19 and 2021-22).
- ECCP's Mathematics Performance Index – High Needs Students has exceeded the host district and state or very near the state over the three reporting periods (2017-18, 2018-19 and 2021-22).
- ECCP's 2021-22 ELA Academic Growth – High Needs Students has exceeded the state and host district over the three reporting periods (2017-18, 2018-19 and 2021-22), and has trended up over the three reporting periods (64.3 percent in 2017-18, 64.7 percent in 2018-19, and 65.9 percent in 2021-22).
- ECCP's Mathematics Academic Growth – High Needs Students of (71.7 percent in 2017-18, and 61.0 percent in 2018-19) were above the host district and state or near the state averages.

- ECCP’s Six-Year Adjusted Cohort Graduation Rate of 93.1 percent in 2018-19 and 100 percent in 2017-18 exceed the host district and state averages.
- ECCP’s suspension rates of 11.8 percent in 2018-19, 8.4 percent in 2019-20, and 7.6 percent in 2021-22 have trended down over the three reporting periods and are approaching the host district and state averages in 2021-22. Note that 2019-20 in-person classes were canceled in mid-March, and in 2020-21, districts implemented different learning models (i.e., in-person, hybrid or remote) and these models often changed during the year.
- ECCP’s 2021-22 Discipline Tier based on suspensions/expulsions data was Tier 1, the highest designation achieved by districts with low suspension rates and low racial/ethnic disparities in discipline data compared to all other districts. ECCP was previously identified as Tier 4 in 2018-19.
- ECCP demonstrates strong community support as evidenced by testimony provided by individuals at the public hearing and interviews with parents and students during the site visit.
- A review of ECCP’s Teacher Education and Mentoring (TEAM) Program determined it is in compliance with the TEAM Program.
- ECCP’s website and governing board documents demonstrate that the governing board meetings are open and accessible to the public.
- No significant findings, conditions, or internal weaknesses were uncovered in ECCP’s three most recent certified financial audits.
- A review of the school’s finances found it to be financially viable.

Areas for Continued Growth Include:

- ECCP’s 2021-22 Accountability Index score of 65.7 percent fell below the state and host district averages and has trended down over the three reporting periods (2017-18, 2018-19, and 2021-22).
- The school’s ELA Performance Index – All Students has decreased 10.4 index points from an index of 70.3 in 2017-18 to an index of 59.9 in 2021-22.
- ECCP’s Mathematics Performance Index – All Students of 48.3 index points in 2021-22 was 10.3 index points below the state’s 58.6 index points and has decreased 17.7 index points from an index of 66.0 points in 2017-18.
- ECCP’s 2021-22 Mathematics Academic Growth – All Students of 45.3 percent is below the host district and state averages and has trended down over the three reporting periods (2017-18, 2018-19, and 2021-22).
- ECCP’s ELA Performance Index – High Needs Students has decreased 11.1 index points from an index of 70.3 points in 2017-18 to an index of 59.2 points in 2021-22.
- ECCP’s Mathematics Performance Index – High Needs Students has decreased 18.4 index points from an index of 66.0 points in 2017-18 to an index of 47.6 points in 2021-22.
- ECCP’s 2021-22 Mathematics Academic Growth – High Needs Students of 44.3 percent is below the host district and state averages and has trended down over the three reporting periods (2017-18, 2018-19, and 2021-22).

- ECCP’s 2018-19 Four-Year Adjusted Cohort Graduation Rate of 73.3 percent is below the host district and state averages.
- A review of ECCP’s chronic absenteeism rates of 9.1 percent in 2018-19 and 10.3 percent in 2019-20 showed they are below the host district and state. In 2021-22, during the midst of the COVID-19 pandemic, the school experienced an increase to 51.2 percent, well above the state average of 23.7 percent and below the host district of 58.1 percent.
- A review of ECCP’s Accounting Policies and Procedures Manual (APPM) by staff from the CSDE’s Office of Internal Audit determined the APPM lacked some of the standard sections of an APPM. The missing items included: credit card statement review and establishing and maintaining assets on inventory. The school anticipates amending its APPM to include these items and present it for review and approval of the governing board at its May 30, 2023, meeting.
- The ECCP Board of Directors and its Finance and Audit Committee have specific roles and responsibilities for oversight of school operations, including financial management, management team and charter school management organization (CMO). 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 and approval by the Board Treasurer, annual review and approval of school policy and procedures by the governing board, a CMO evaluation in compliance with the CMO contract and site visit findings. The school indicates the BPPM is currently being revised for the next board term beginning in June 2023. The revision will formally document the roles and responsibilities of ECCP’s governing board and its Finance and Audit Committee for the oversight of school operations, including financial management, management team, and CMO.
- A review of ECCP’s state certified staff file and employee roster determined 7.0 staff are not properly certified. The school is working with the CSDE staff within the Talent Office, Bureau of Certification and Educator Standards, to develop a plan to address all instances of certification non-compliance.
- A review of ECCP’s Educator Evaluation and Support Plan (EESP) determined it is out of compliance. The EESP was submitted for the 2015-16 school year and approved by the CSDE under the conditions of a waiver from some components of the *Connecticut Guidelines for Educator Evaluation*, which have now expired. The school is working with the CSDE staff within the Talent Office, Bureau of Educator Effectiveness, to ensure it develops an EESP aligned to the revised the *Connecticut Guidelines for Educator Evaluation* (2023), submits the EESP to the CSDE Talent Office for review and approval by April 1, 2024, and implements the new EESP in accordance with the SBE adopted implementation plan for the 2024-25 school year.

Conclusion

Elm City College Prep is providing its students, families, and community with a viable public school choice option, achieving its mission, and making strides in closing Connecticut’s achievement gap. The school’s suspension rates over the three reporting periods (2018-19, 2019-20, and 2021-22) have trended down to within 1.1 percentage points of the state average in 2021-22. ECCP’s Tier 1 Discipline designation in 2021-22 is representative of a school that equitably implements clear and consistent behavioral policies and procedures across the students it serves.

While the school's Four-Year Adjusted Cohort Graduation Rate in 2018-19 decreased from the previous year, 2017-18, to a rate below the host district and state, its Six-Year Adjusted Cohort Graduation Rates in 2017-18 and 2018-19 exceeded the host district and state. The school's chronic absenteeism rates remained below the host district and the state in the 2018-19 and 2019-20 school years. However, during the COVID-19 pandemic in 2021-22, the school experienced a chronic absenteeism rate increase well above that experienced by the host district and the state. To meet student needs, school administration and staff have developed systems and supports to identify students and families with attendance issues. This work will need to continue and expand to include determining the root causes of poor attendance and provide supports and resources to address barriers that negatively affect student attendance.

ECCP's Academic Growth ELA – All Students and High Needs Students have trended up over the three reporting periods (2017-18, 2018-19, and 2021-22) and exceeded the host district and the state averages. Conversely, Academic Growth Mathematics – All Students and High Needs students have trended down over the three reporting periods (2017-18, 2018-19, and 2021-22) to below the host district and state averages in 2021-22. While ECCP's ELA Performance Index – All Students and High Needs Students rates have exceeded the host district and state or near the state, both populations experienced a decrease in ELA performance over the time periods reported (2017-18, 2018-19, and 2021-22). While the school's Mathematics Performance Index – All Students and High Needs Students Rates exceeded the host district and state averages in 2017-18 and 2018-19, in 2021-22, both populations experienced a decrease in mathematics performance, above that experienced by the state. The school is out of compliance with teacher certification and EESP.

Charter Renewal Recommendation

Acknowledging that ECCP's academic and attendance performance indicators are not without weakness, and ECCP is also out of compliance with teacher certification, an issue it was previously cited for and contributed to the school being placed on probation on February 6, 2020, the CSDE recommends that the SBE renew the school's charter for a period of three years, subject to the following conditions:

1. By May 5, 2023, ECCP shall submit a corrective action plan acceptable to the Commissioner of Education. The corrective action plan must include strategies and action steps to improve student academic achievement. Additionally, ECCP must utilize the CSDE Acceleration Cycle as a framework for developing and implementing an improvement plan to address learning acceleration, learning recovery, and student enrichment because of the pandemic. The school must convene a team to develop and monitor the implementation of a plan that intentionally addresses unfinished learning while focusing on the teaching of prioritized, essential content, and maintaining a high level of rigor for all learners. ECCP shall submit to the CSDE, on a bi-monthly basis beginning October 2023, a report monitoring its year-to-date progress of improving student academic achievement. The plan shall be developed in consultation with the CSDE's Turnaround Office. ECCP shall implement the corrective actions within thirty days following the Commissioner of Education's acceptance of the plan.

2. By May 5, 2023, ECCP shall submit a corrective action plan acceptable to the Commissioner of Education. The corrective action plan must target and address chronic absenteeism by: (a) isolating the root causes of chronic absenteeism; (b) identifying interventions to target root causes; and (c) monitoring interventions and applying midcourse corrections, as necessary. The plan shall be developed in consultation with the CSDE's Turnaround Office. ECCP shall implement the corrective actions within thirty days following the Commissioner of Education's acceptance of the plan. The CSDE will review ECCP's year-to-date number of student chronic absenteeism on EdSight at the year-end of June 30, 2023. Additionally, the CSDE will develop with ECCP, a bi-monthly review of the school's chronic absenteeism rate beginning in October 2023.
3. By May 5, 2023, ECCP shall submit a plan for the CSDE review and approval to bring its staff into certification compliance by October 31, 2023, 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, and action steps, including responsible school staff, on August 1, 2023, 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.

In October of 2023, ECCP administrative staff will meet with the Accountability and Support Committee of the SBE and provide a status update of its corrective action plan to address student achievement, chronic absenteeism, and teacher certification. At that time the Accountability and Support Committee members and department staff will analyze the performance data to determine if the prioritized strategies in the corrective action plans are making an impact on student outcomes and teacher practice. The school will also provide an update of its efforts to develop an EESP aligned to the revised *Connecticut Guidelines for Educator Evaluation (2023)* and submit the EESP to the CSDE for review and approval by April 1, 2024. Dependent on the status of the issues discussed, ECCP administrative staff may be called back to meet with the Accountability and Support Committee of the SBE to provide a second update in the spring of 2024.

Recognizing that ECCP must adequately address student achievement, chronic absenteeism, and teacher certification through corrective actions, pursuant to Section 10-66bb(h) of the C.G.S., the Commissioner of Education may, at any time, place a charter school on probation if the school has failed to adequately demonstrate student progress or comply with applicable laws and regulations.

The CSDE will notify ECCP of action taken by the SBE following its meeting on April 5, 2023. The school will be advised of relevant technical assistance opportunities designed to improve its educational program. The CSDE will conduct follow-up visits to ensure ECCP is addressing the issues raised in this memorandum.

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

Reviewed by: Irene E. Parisi, M.Ed.
Chief Academic Officer

CHARTER RENEWAL REPORT | 2022

Charter School Information		
Charter School Name:	Elm City College Preparatory School	
School Director/ Principal:	Lauren D 'Addario	
School Board Chairperson:	Dick 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 school 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:	953.1/1450	65.7
Notes and Evidence:		
<p>Elm City College Prep (ECCP) 2021-22 Accountability Index of 65.7 percent is 4.0 percentage points below the state’s Accountability Index of 69.7 percent. Schools that meet Standard 1: are schools earning an accountability index score from 85 to 100 (Category 1), schools earning an accountability index score from 70 to 84.9 percent (Category 2), and schools earning an accountability index score of 69.9 percent or lower and have not been identified as a Turnaround or Focus School (Category 3). ECCP’s Accountability Index score of 65.7 percent places its performance in Category 3, which earns a does not meet for Standard 1. ECCP’s 2021-22 Next Generation Accountability Report is shown in detail on the next page.</p>		

Next Generation Accountability, 2021-22 – Elm City College Preparatory School (Grades: K-12)
School Category: 3

Indicator	Index/Rate	Target	Points Earned	Max Points	% Points Earned	State % Points Earned
1a. ELA Performance Index - All Students	59.9	75	40.0	50	79.9	85.6
1b. ELA Performance Index - High Needs Students	59.2	75	39.5	50	79.0	72.3
1c. Math Performance Index - All Students	48.3	75	32.2	50	64.4	78.2
1d. Math Performance Index - High Needs Students	47.6	75	31.7	50	63.4	63.6
1e. Science Performance Index - All Students	47.8	75	31.9	50	63.7	81.9
1f. Science Performance Index - High Needs Students	47.9	75	32.0	50	63.9	68.4
2a. ELA Academic Growth - All Students	68.7%	100%	68.7	100	68.7	60.4
2b. ELA Academic Growth - High Needs Students	65.9%	100%	65.9	100	65.9	56.2
2c. Math Academic Growth - All Students	45.3%	100%	45.3	100	45.3	65.2
2d. Math Academic Growth - High Needs Students	44.3%	100%	44.3	100	44.3	59.1
2e. Progress Toward English Proficiency - Literacy	74.2%	100%	37.1	50	74.2	64.9
2f. Progress Toward English Proficiency - Oral	65.6%	100%	32.8	50	65.6	57.4
4a. Chronic Absenteeism - All Students	51.2%	<=5%	0.0	50	0.0	25.1
4b. Chronic Absenteeism - High Needs Students	53.3%	<=5%	0.0	50	0.0	0.0
5. Preparation for CCR - Percent Taking Courses	100.0%	75%	50.0	50	100.0	100.0
6. Preparation for CCR - Percent Passing Exams	26.5%	75%	17.7	50	35.3	58.0
7. On-track to High School Graduation	91.1%	94%	48.4	50	96.9	87.9
8. 4-year Graduation: All Students (2021 Cohort)	91.2%	94%	97.0	100	97.0	95.3
9. 6-year Graduation: High Needs Students (2019 Cohort)	93.1%	94%	99.0	100	99.0	90.6
10. Postsecondary Entrance (Graduating Class 2021)	74.2%	75%	98.9	100	98.9	88.2
11. Physical Fitness (estimated participation rate = 31.6%)	57.1%	75%	0.0	50	0.0	61.1
12. Arts Access	49.0%	60%	40.8	50	81.6	87.4
Accountability Index	.		953.2	1450	65.7	69.7

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	63.1	59.2	3.9	16.6	N
Math Performance Index Gap	51.4	47.6	3.8	18.5	N
Science Performance Index Gap	47.1	47.9	-0.8	17.9	N
Graduation Rate Gap (2019 Cohort)	.	93.1	.	4.8	

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	97.4
ELA - High Needs Students	97.4
Math - All Students	97.2
Math - High Needs Students	97.1
Science - All Students	95.4
Science - High Needs Students	95.7

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: The CSDE site visit staff reviewed ECCP’s last three certified financial audits and uncovered no significant findings, conditions, or internal control weaknesses. Indicator 2.2: The CSDE site visit staff reviewed ECCP’s last three certified financial audits, Accounting Policies and Procedures Manual (APPM), board procedures, budgets, and interviewed the school’s principals, director of operations, and governing board members. Staff from the CSDE’s Office of Internal Audit determined the APPM contained the standard sections of an APPM. However, the APPM required amendments in the areas of credit card statement review and approval by the Board Treasurer and establishing and maintaining assets on inventory. The ECCP Board of Directors and its Finance and Audit Committee have specific roles and responsibilities for oversight of school operations including financial management, management team and charter school management organization (CMO). 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 and approval by the Board Treasurer, annual review and approval of school policy and procedures by the governing board, and a charter school management organization (CMO) evaluation in compliance with site visit findings. The reviewers determined ECCP completed on-time submission of certified audits and annual budgets. The school anticipates amending its APPM to include the missing items and present it for review and approval of the governing board at its May 30, 2023, meeting. The school indicated the BPPM is currently being revised for the next board term beginning in June 2023. The revision will formally document the roles and responsibilities of the governing board and its Finance and Audit Committee for the oversight of school operations. Indicator 2.3: Staff from the CSDE’s Office of Internal Audit reviewed ECCP’s latest certified financial audit and determined its debt-to-asset ratio (total liabilities/total assets), current asset ratio (current assets/current liabilities), days of unrestricted cash (unrestricted cash/((total expenditures – depreciation)/365)), debt service coverage ratio (net income + depreciation + interest expense)/(principal + interest payments) and cash flow (change in cash balance) 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 conflict of interest and nepotism were found to comply with the CSDE administrative oversight guidelines. ECCP’s policies and procedures regarding background checks of staff and board members, open board meetings, board membership, and membership training were reviewed and found to comply with state and federal laws, rules, and regulations. This finding is supported by a review of school policies and procedures, background checks, board training records, and the school’s website including board meeting minutes. A review of ECCP’s bylaws found them to comply with state and federal laws, rules, and regulations. As indicated in Indicator 2.2, it is important that going forward the board establish and follow its oversight responsibilities of school policy review on an annual basis. 	

- **Indicator 2.5:** As evidenced during the site visit, ECCP has 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 checked="" type="checkbox"/> M <input 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 type="checkbox"/> PA <input checked="" type="checkbox"/> DNM

Notes and Evidence:

- Indicator 3.1:** The latest CSDE audited student enrollment data from 2022-23 reported 783 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 waiting list information (Table 5, page 19) determined that the school maintains a waiting list of families beyond the available number of seats. In 2022-23, 16 students were on the waiting list. The waiting list has included more than 15 students each year for the past three years.
- Indicator 3.3:** A review of ECCP’s latest CSDE audited Public School Information System (PSIS) data from 2022-23 reported 78.3 percent of students qualify for free or reduced-price meals. The percentage of special education students is 8.9 percent. ECCP’s multilingual learners/English learners (MLs/ELs) population is 9.3 percent.
- Indicator 3.4:** ECCP demonstrates strong community support, as evidenced by parent interviews conducted by the CSDE renewal team on the day of the site visit. The parent focus group described various communication methods between the school and families, including texts, phone calls, emails, and written communication including translations in second languages, when necessary. Currently, parents report receiving regular updates from the school that detail student academics and behavior. Parents expressed support for what they perceive is a good educational model that prepares their children for high school and beyond. Parents indicated they were satisfied with the school’s commitment to serving students with diverse needs while providing a safe and nurturing environment. Students and graduates who testified during the public hearing on January 19, 2023, and student interviews conducted by the CSDE renewal team on the day of the site visit reported they were generally happy with the school and choice opportunity that the school provides. Over 30 people attended the public hearing. Seventeen individuals offered testimony supporting the school’s efforts and the renewal of the charter. No one spoke out against the renewal of the school’s charter.
- Indicator 3.5:** School culture and climate policies reviewed by the CSDE’s site visit staff were clear and concise. Classroom observations revealed consistent implementation of the school’s behavior management model. ECCP’s 2021-22 suspension rate of 7.6 percent was above but in keeping with the host district’s 6.1 percent and the state’s 6.5 percent. Additionally, the school’s suspension rate has consistently declined over the three reporting periods (2018-19, 2019-20, and 2021-22), going from 11.8 percent in 2018-19 to 7.6 percent in 2021-22. ECCP’s chronic absenteeism rate of 51.2 percent in 2021-22 was below the host district’s 58.1 percent, but was well above the state average of 23.7 percent by 27.5 percentage points, and increased 40.9 percentage points from 10.3 percent in 2019-20. ECCP must refine efforts to improve student engagement and attendance.

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 checked="" type="checkbox"/> PA <input 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, TEAM, and EESP	<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’s website and governing board documents demonstrated that the governing board meetings are open and accessible to the public. The governing board’s meeting schedule for the year and meeting agendas are posted on the school’s website. Education records and testing data are kept in locked file cabinets in secure rooms. Indicator 4.2: A review of ECCP’s latest audited 2022-23 Public School Information System (PSIS) data reported the percentage of special education students at the school is 8.9 percent. All special education identified students reside in New Haven. To meet the needs of identified students, ECCP employed two special education deans, five full-time certified special education teachers, and one paraprofessional. New Haven Public Schools (NHPS) and Area Cooperative Educational Services (ACES) provide any required related services outlined in the student’s Individualized Education Plan (IEP). The special education deans maintain logs of related services provided to students. Any missed related services are made up. All the IEPs reviewed noted that students receive specialized instruction services via push-in and pull-out methods in accordance with the student’s IEP. <p>The special education deans utilize “IEPs at a glance” to review each student’s IEP with the special education teachers and the student’s general education teacher. This review also includes the review of the accommodations and modifications for each identified student. The special education teachers follow-up with the general education teachers to provide support, answer questions, and ensure accommodations and modifications are being implemented per the student’s IEP. All new teachers receive special education training, provided by CMO staff, prior to starting employment at the school. The special education deans provide continuous learning opportunities throughout the school year regarding a variety of topics related to special education. The special education deans schedule and coordinate all the Planning and Placement Team (PPT) meetings. Required staff from NHPS along with charter school staff, a special education dean, and relevant related service providers attend all PPT meetings. Currently, the parents have the option to meet virtually for the PPT meeting or to meet in person at the charter school. The special education deans and CMO staff work with NHPS representatives to ensure IEPs are completed and finalized.</p> <p>Student education files are kept in locked file cabinets in a secure room. All files reviewed were found to be well-organized and maintained. The special education deans reported that either a sign-in/sign-out sheet is outside each cabinet or in each individual student file.</p> <p>The CSDE site visit team encouraged the administration to consider reviewing new students’ IEPs more than annually to determine if it would be appropriate to revise the IEP based on the student’s progress. Similarly, the school may consider providing professional development regarding the requirement to convene a PPT meeting to review the student’s IEP if the student is making unsatisfactory and/or limited progress on the goals and objectives in the student’s IEP. The school and</p>	

CMO indicated it will conduct professional development focused on using progress monitoring to drive decisions regarding progress towards the student's IEP goals for its special education deans and teachers. The professional development will also support special education deans and teachers with making appropriate adjustments to the IEP if the student is making unsatisfactory and/or limited progress. Lastly, the school and CMO committed to notifying its host district of instances where students are making unsatisfactory and/or limited progress and to work with the district to schedule program reviews to update IEPs accordingly.

The CSDE site visit team encouraged the administration to continue to closely monitor the progress of all students with speech and language services in their IEPs, given that the services are being delivered remotely, and review/revise the individual IEP, as needed, and determine any required compensatory education. The school indicated the special education deans will weekly review speech and language service logs to confirm services are being delivered with fidelity to avoid required compensatory education. The special education deans will also review progress toward individual IEP goals to determine if a program review should be called if a student is not making adequate progress. The special education deans will meet with the speech-language pathologist (SLP) on an as-needed basis to address areas of concern. The special education deans will also review progress toward IEP goals and confirm students are making adequate progress during the learning specialist's weekly meetings.

- **Indicator 4.3:** A review of ECCP's latest audited 2021-22 PSIS data reports indicated that the percentage of students identified as MLs/ELs at the school is 13.5 percent. Through an analysis of the renewal materials and meeting with stakeholder groups, it became evident that ECCP is committed to ensuring the success of MLs/ELs at the school. The school has taken actions that affirm this commitment to MLs/ELs by enhancing its resource and guidance documents pertaining to MLs/ELs and by working to address staffing issues related to TESOL (formerly Teachers of English to Speakers of Other Languages) and bilingual personnel including attempting to hire a certified bilingual teacher. Additionally, the school is committed to providing training to teachers to enable them to integrate ML/EL supports in the core curriculum. The school has applied for the Title III grant funds for which it is eligible, as it has done in preceding years. The school has taken the required actions as a bilingual mandated district to complete the bilingual grant application and submit with the bilingual grant application a TESOL in lieu of a letter to the Commissioner of Education, and post for a certified bilingual teacher. The school is commended for taking these actions and providing a comprehensive collection of the ML/EL forms, procedures, and assessments in its Charter Renewal Application materials. A review of the school's ML/EL Screening Guidance determined amendments were required. The school is in the process of making the necessary policy amendments.
- **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 review of ECCP’s staff file of February 16, 2023, reported 88.3 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, temporary certificates, permits, or authorizations. Of the 60 staff members requiring certification, 23.5 staff members or 39.2 percent hold a valid certificate and 29.5 staff members or 49.2 percent hold other temporary certificates, permits, or authorizations. The remaining 7 staff members or 11.7 percent have no active certification/permit on file. Of the 50 percent allowed to serve under other interim certificates, temporary 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 6.8 staff members or 11.3 percent holding CSEPs.

ECCP is in compliance with the Teacher Education and Mentoring (TEAM) Program. ECCP has eight beginning teachers who have been matched with appropriate mentors. There is one trained Reflection Paper Reviewer at the school. Beginning teachers submit 2-3 module reflection papers each year for review. ECCP needs to review at least the same number of reflection papers from the statewide portal as are submitted by ECCP’s beginning teachers. The one trained Reflection Paper Reviewer will need to meet the reflection paper review requirement. The school is committed to ensuring that the required reflection paper reviews are completed by the one trained Reflection Paper Reviewer.

ECCP is out of compliance with Educator Evaluation and Support (EES). The CSDE approved Educator Evaluation and Support Plan (EESP) that is currently on file for ECCP was initially submitted for the 2015-16 school year and was approved by the CSDE under the conditions of a waiver from some components of the *CT Guidelines for Educator Evaluation*, which has now expired. The CSDE EES Council, known in the C.G.S. as the Performance Evaluation Advisory Council (PEAC), recommended to the State Board of Education (SBE) to revise the *Connecticut Guidelines for Educator Evaluation* which the SBE approved on March 1, 2023, as well as a to plan for implementation of the revised *Connecticut Guidelines for Educator Evaluation* by districts (including charter schools).

Given the amount of time and commitment of staff to revise and develop a new EESP and to train educators and evaluators to implement the EESP with fidelity, for the 2023-24 school year, ECCP will continue to implement the 2015-16 EESP that is currently in place and adopt the Flexibilities to the *Connecticut Guidelines for Educator Evaluation* (2017) in their entirety. During the 2023-24 school year, ECCP’s Professional Development and Evaluation Committee (PDEC) shall be required to develop an EESP aligned to the revised *Connecticut Guidelines for Educator Evaluation* (2023), submit the EESP to the CSDE for review and approval by April 1, 2024, and implement the new EESP in accordance with the SBE-adopted implementation plan for the 2024-25 school year.

- 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 any law by the school.

Prepared by:	Reviewed by:
Robert E. Kelly Charter School Program Manager	Irene E. Parisi Chief Academic Officer

ELM CITY COLLEGE PREPRATORY SCHOOL TABLES

Table 1: 2022-23 Student Enrollment and Demographic Information	
Grades served:	K-12
Total enrollment:	783
Percentage of students eligible for free or reduced-price meals:	78.3
Percentage of students with disabilities:	8.9
Percentage of students identified as English Learners:	9.3
Percentage of American Indian or Alaska Native students:	*
Percentage of Asian students:	*
Percentage of Black or African American students:	63.5
Percentage of Hispanic or Latino students:	31.9
Percentage of Two or More Races:	2.0
Percentage of White students:	2.3

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

ELM CITY COLLEGE PREPRATORY SCHOOL

Table 2: School Performance: All Students									
	2017-18			2018-19			2021-22		
Indicator	School	Host District	State	School	Host District	State	School	Host District	State
Accountability Index	82.3	65.0	74.9	76.1	64.7	74.2	65.7	60.9	69.7
ELA-All Students									
Performance Index (Target 75)	70.3	57.8	67.6	68.2	57.8	67.7	59.9	51.3	64.2
Academic Growth Average Percentage of Target Achieved (Target 100%)	64.3	58.3	60.7	64.9	55.2	59.9	68.7	58.7	60.4
Math-All Students									
Performance Index (Target 75)	66.0	50.3	62.7	64.5	50.6	63.1	48.3	42.0	58.6
Academic Growth Average Percentage of Target Achieved (Target 100%)	71.7	53.6	61.9	61.2	53.6	62.5	45.3	59.7	65.2
Graduation									
Four-Year Adjusted Cohort Graduation Rate (Target 94%)	96.2	78.9	88.3	73.3	80.9	88.5	N/A	N/A	N/A

In 2019-20, Connecticut received a waiver from the U.S. Department of Education (USDOE) to be exempt from administering state academic assessments and holding schools and districts accountable using the Next Generation Accountability System.

In 2020-21, Connecticut secured a waiver from the USDOE to be exempted from implementing the Next Generation Accountability System for schools and districts; and while districts made their best effort to assess as many students as possible, there was not a requirement to test at least 95 percent of students as in past years. Additionally, school learning models changed throughout the school year and students were remote to varying degrees due to factors beyond educator control. Also, some students tested remotely, which was a new construct. As such, 2020-21 testing data is not being used as part of this analysis.

Table 3: School Performance-High Needs Students

Indicator	2017-18			2018-19			2021-22		
	School	Host District	State	School	Host District	State	School	Host District	State
ELA-High Needs Students									
Performance Index (Target 75)	70.3	54.2	57.5	68.2	54.9	58.1	59.2	48.2	54.2
Academic Growth Average Percentage of Target Achieved (Target 100%)	64.3	56.0	55.6	64.7	53.6	55.1	65.9	57.1	56.2
Math-High Needs Students									
Performance Index (Target 75)	66.0	46.9	52.0	64.5	47.8	52.7	47.6	39.0	47.7
Academic Growth Average Percentage of Target Achieved (Target 100%)	71.7	52.2	55.4	61.0	52.4	55.2	44.3	58.8	59.1
Graduation									
Six-Year Adjusted Cohort Graduation Rate (Target 94%)	100.0	82.6	85.2	93.1	83.6	85.2	N/A	N/A	N/A

In 2019-20, Connecticut received a waiver from the U.S. Department of Education (USDOE) to be exempt from administering state academic assessments and holding schools and districts accountable using the Next Generation Accountability System.

In 2020-21, Connecticut secured a waiver from the USDOE to be exempted from implementing the Next Generation Accountability System for schools and districts; and while districts made their best effort to assess as many students as possible, there was not a requirement to test at least 95 percent of students as in past years. Additionally, school learning models changed throughout the school year and students were remote to varying degrees due to factors beyond educator control. Also, some students tested remotely, which was a new construct. As such, 2020-21 testing data is not being used as part of this analysis.

Table 4: School Culture and Climate

*Data are suppressed to ensure confidentiality

Indicator	2018-2019			2019-2020 ¹			2021-2022		
	School	Host District	State	School	Host District	State	School	Host District	State
Chronic Absenteeism Rate (%)	9.1	19.3	10.4	10.3	21.1	12.2	51.2	58.1	23.7
Suspension Rate (%)	11.8	7.3	6.7	8.4	4.6	4.9	7.6	6.1	6.5
Discipline Tier	4	2	3	3	2	3	1	1	1

Table 5: Student Wait List and Mobility Information

Performance Metric:	2020-21	2021-22	2022-23
Wait List number:	317	38	16
Number of enrolled students who left during the school year:	30	59	24
Number of students who did not re-enroll the next year and had not completed the highest grade at the school:	25	22	13

¹ In the 2019-20 school year, due to the COVID-19 pandemic, in-person classes were cancelled in mid-March; all districts switched to fully remote instruction for the remainder of the school year.



WOODBIDGE SCHOOL DISTRICT

40 Beecher Road – South
Woodbridge, Connecticut 06525

Christine Syriac – Interim Superintendent
csyriac@woodbridgeps.org

September 27, 2022

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 Irene Parisi 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,

Christine Syriac
Interim Superintendent