



*Our vision is to serve as a BEACON of virtue, truth, and beauty
enlightening young hearts and minds to
benefit society at large.*

May 2, 2017

VIA: EMAIL AND HAND DELIVERY TO NATIONAL SCHOOL DISTRICT

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Members, Board of Trustees
National School District
1500 N Avenue
National City, CA 91950

Leighangela Brady, Ed.D
Superintendent

Re: “Notice of Intent to Revoke and Notice of Facts in Support of Revocation—ALL ITEMS RESOLVED & Further Progress Being Made”

Dear Board of Trustees and Dr. Brady:

Beacon Classical Academy National City (“Beacon” or the “Charter School”) is in receipt of the Notice of Intent to Revoke and Notice of Facts in Support of Revocation delivered by the National School District (the “District” or “NSD”) Board of Education on April 6, 2017. This letter contains Beacon’s response to “Notice of Intent to Revoke and Notice of Facts in Support of Revocation”. See attached Appendix A for a list of all Appendices.

When Beacon envisioned our program, we did so with a desire to promote *humanitas*, a Latin noun meaning culture, moral, humanness (humane - compassionately kind). The goal is the attainment of knowledge coupled with wisdom and infused with virtue to promote socially responsible, caring, and productive citizens. This is not so different from what the District also pursues.

Traditionally, classical education is the cultivation of the human soul as it pertains to truth, goodness and beauty through the seven liberal arts (*trivium* -grammar, logic, and rhetoric; and *quadrivium*—arithmetic, geometry, music, and astronomy). Hence, our vision is to serve as a BEACON of virtue, truth, and beauty, enlightening young hearts and minds to benefit society at large.

The Charter School is presently composed of 68.4 % Title-1 eligible students and 57% English Learner (“EL”) students. The typical Beacon Classical student arrives at our door 1.6 grade levels behind, with some who started out 5 years below, with no identified learning disabilities. These students were basically the “left behind kids.” Parents chose Beacon because we have smaller class sizes, more structure, teach a classical approach, and because we emphasize a passion for learning.

Correcting Issues Regarding Adequately Pursuing Pupil Outcomes Identified in Beacon’s Charter – RESOLUTION ONGOING – STUDENTS PROGRESSING

While Beacon set for itself the ambitious goal of 85% of students demonstrating growth towards proficiency, the District misunderstands the applicable timeline for that goal. The goal is not pegged to 1 year. Instead, the charter was approved for 5 years, so the goal may only be measured against 5 years of operation. Charter schools are approved for 5-year terms so they can effectively establish their program, incorporating progressive layered concepts, programs and methods, as needed which is needed to lay a solid foundation to realize their goals. In order to see the goal reached, the District would need to honor the 5-year charter contract.

On the California Assessment of Student Performance and Progress (“CAASPP”) English-Language Arts assessment, specifically, 34% of students nearly met standards and 49% of students did not. In Mathematics, 29% of students nearly met standards and 65% of students did not. This means that less than 20% of our students met or exceeded standards in ELA and almost none in math. Such numbers are not acceptable to Beacon. In response

to these scores and other assessment data, Beacon developed an intervention plan to assist all students, which is described below.

Addressing the 2015-16 CAASPP and MAP Results

When the school looked at 15-16 CAASPP and MAP results, we designed a plan to address the shortfall in our progress. We decided to provide more effective classroom management and instructional strategies, especially in working with EL students, by providing more curriculum training for teachers, increasing the daily instructional minutes, carving out more small group instruction during the day, and offering free after school and intercession tutoring. We did this before the District's audit and afterwards until we lost our facility. Once we re-entered our building, the interventions began again. Also, in lieu of losing so many face-to-face instructional days, we added 8 more days of instruction to the calendar year, which we paid out of our own budget.

Beacon Classical Academy's charter petition stated that it would *utilize a wide variety of measures to assess the school's accomplishments and to gauge the overall effectiveness of its educational program and achieving our school-wide outcomes... (p 46). This alternative data helps us to know if students are making progress in Common Core skills and provides insight on what instructional corrections to apply. The data enables us to demonstrate school-wide growth (and individual growth)... to increase accountability with parents and the public (p 46, charter petition).*

Northwest Evaluation Association ("NWEA") provides educational support for interim assessments, Measures of Academic Progress ("MAP"). MAP assessments use measurement scales that span grades to compare achievement and changes in growth during the school year. School-level norms provide references for comparing how grade levels of students within a school compare, as a group, to the same grade level of students in public schools across the nation.

MAP assessments can be used to review individual cohort growth (same students) from one testing period to another. We will look at individual growth from last year, 2015-16

Fall to Spring, and this year's Fall to Winter to review this year's progress towards the Spring MAP norms.

As stated in the charter petition, Beacon is “committed to establishing clear, measurable goals, and to regularly monitor and adjust its actions towards evidence of increased student learning.” Beacon set the standard that 85% of students at grade level will demonstrate **at least one year of growth towards grade-level proficiency** in English reading and language arts and math. And for students below grade level, 85% will demonstrate **at least .5 years of growth**. Key phrases to note from the charter include: “at least one year of growth,” “at least .5 years of growth,” and “towards grade-level proficiency.” The words “at least” leave room for growth beyond the minimum of .5 and 1-year goals. The words towards grade-level proficiency refers to increases in growth, moving towards grade level targets. Please note that improved AT LEAST .5 year or 1 year means that more progress could have happened, and did in many cases.

NWEA's MAP GROWTH PERCENTAGES 15-16

When we made our initial reports we counted students who came in above grade level and stayed above grade level as "growth". This time we used that same methodology, but if they came in and ended above grade level we counted them as a “Yes” for these two groups.

For Reading from the beginning of the year 2015 -16 to the end of the year demonstrated that 53.2% made one year's growth. And 52% of students that were below grade level improved AT LEAST .5 grades.

- Out of 179 students 77 students started at grade level, 41 students or 53.2% improved AT LEAST 1 year according to MAP norms (Exhibit 1.A).
 - Out of the 41 students who came in at grade level and grew at least one whole grade level, *40 students grew more than one grade level*. So 97.6% of the students who came in at grade level grew more than one grade level.
 - Specifically, the 40 students grew an average of 1.5 grade levels (Exhibit 1.B).

- Out of 179 students 102 students started below grade level, 53 students or 52% improved AT LEAST .5 grades according to MAP norms (Exhibit 1.A).
 - Out of the 53 students who came in below grade level and grew at least half of a grade level, 1 student grew to where they should have been or beyond. So 1.9% of the students who came in below grade level grew to where they should have been or beyond that level (Exhibit 1.C).

Likewise, MAP progress for **Mathematics** from the Fall to Spring for 2015-16 demonstrated that 51.8% made at least one year's growth on the MAP. And 53.1% of students that were below grade level made at least .5 years of growth.

- Out of 179 students, 83 student started at grade level, 43 students or 51.8% improved AT LEAST 1 year according to MAP norms (Exhibit 1.A).
 - Out of the 43 students who came in at grade level and grew at least one whole grade level, 36 out of the 43 students grew more than one grade level. So 83.7% of the students who came in at grade level grew more than one grade level (Exhibit 1.D).
 - Specifically, the 36 students grew an average of 1.7 grade levels.
- Out of 179 students, 96 students started below grade level, 51 students or 53.1% of the students below grade level improved AT LEAST .5 grades according to MAP norms (Exhibit 1.A).
 - Out of the 51 students who came in below grade level and grew at least half of a grade level, 6 students grew to where they should have been or beyond. So 11.8% of the students who came in below grade level grew to where they should have been or beyond that level (Exhibit 1.E).

English Language Learners

Since we have such a high population of English Learners, our total number of English Learners was 72 students, we looked at their average growth separately.

At Grade Level - 20 EL students came in at grade level. Of the 20 students that came in at grade level, 6 showed at least one grade level of growth. So 30% reached or went beyond (Exhibit 1.F).

Out of the 6 students who came in at grade level and grew at least one whole grade level, 5 students grew more than one grade level. So 83.3% of the students who came in at grade level grew more than one grade level.

Below Grade Level - 52 came in below grade level. Of the 52 that came in below, 23 reached at least half a grade level of growth. So 44.2% reached or went beyond (Exhibit 1.F).

Out of the 23 students who grew at least half of a grade level, 1 student grew to where they should have been or beyond. So 4.3% of the students who came in below grade level grew to where they should have been or beyond that level.

At Grade Level - 27 EL students came in at grade level. Of the 27 students that came in at grade level, 10 showed at least one grade level growth. So 37% reached or went beyond (Exhibit 1.F).

Out of the 10 students who came in at grade level and grew at least one whole grade level, 8 students grew more than one grade level. So 80% of the students who came in at grade level grew more than one grade level.

Below Grade Level - 45 came in below grade level. Of the 45 who came in below, 26 reached at least half a grade level of growth. So 57.8% reached or went beyond (Exhibit 1.F).

Out of the 26 students who came in below grade level and grew at least half of a grade level, 3 students grew to where they should have been or beyond. So 11.5% of the students who came in below grade level grew to where they should have been or beyond that level.

NWEA's MAP GROWTH PERCENTAGES 16-17

There's a very significant aftermath we are recovering from this year, we lost a higher percentage of students from last year to this year who were at grade level or higher, so the weighted average of our pool of students changed in a more challenging way— a lot more students in the Fall were below grade level than the year before, and this is with the testing window pushed back.

It also needs to be understood that this year's Fall MAP assessments were given the week of December 5th through 12th, in a “noisy” gym. We were ousted from the facility on November 4th right before our scheduled Fall MAP testing and we normally take the Winter assessment in late February. Our normal MAP assessment schedule gives us at least a 3-month window between assessments. The Winter MAP assessments were given the week of March 13 through 17 at the end of the third quarter. So when the second quarter ended on December 16th, the students were on vacation for 3 weeks, were given vacation practice packets and highly encouraged to complete them. Upon their return, they were provided independent study packets coupled with tutoring, and they attended field trips. It was not until February 13th that Beacon students joyfully reentered their building. From February 13th to March 12th, Beacon students received just 4 weeks of face-to-face instruction before being assessed with the MAP assessments again. Nevertheless, even after only receiving one month of classroom instruction, the assessments demonstrated that 56.4% of students were increasing at least 1 year's growth according to MAP norms. And 57.6% of students that were below grade level were increasing at least .5 years of growth. This is a huge improvement from last year with still a quarter left. We have even higher expectations now that our students are fully settled into our school facility, without interruptions, and our teachers are back to their daily teaching and after school tutoring.

For Reading, this year's growth as measured in March shows that 56.4% students are increasing at least one grade level on the MAP assessment and 57.4% of students below grade level have already achieved .5 years of growth or more. Furthermore, please note

the following:

- Out of 105 students, 39 students started at grade level, 22 or 56.4% are making progress toward at least one grade level of growth from the 2nd to the 3rd quarter.
- Out of 105 students, 66 students started below grade level, 38 or 57.6% are increasing at least half of a grade level from the 2nd to the 3rd quarter. This is higher than our 15-16 Fall to Winter percentage.

For Mathematics, this year's growth as measured in March shows that 54.5% students are increasing at least one grade level on the MAP assessment and 68.6% of students below grade level have already made .5 years of growth or more

- Out of 103 students, 33 students started at grade level and 18 students or 54.5% are making progress toward at least one grade level of growth from the 2nd to the 3rd quarter.
- Out of 103 students, 70 students started grade below, 48 students or 68.6% are increasing at least half of a grade level from the 2nd to the 3rd quarter. *This growth is a very strong and positive sign of Beacon's effectiveness.*

Our Charter indicates that students starting below grade level will increase by at least half of a grade level (.5), but we are seeing *1+ grade level growth!* Although a smaller amount of students showed 1+ grade level improvement in reading, the greater increase was in mathematics and this year is not yet finished. Therefore *we can expect more students to increase 1+ level by end of this school year.*

We expect that students achieving below grade level will actually make more than .5 years growth annually. Ideally, we want them to reach grade level proficiency as soon as possible. On average, the students below grade started out 1.5 grade levels below, and on average they made 1+ grade level growth towards proficiency. This means that Beacon is helping students to close the deficits they had at the time of enrollment. This is very good! Based on this being only our 2nd year of operation as a classroom-based charter with National, we are on track to achieve grade level status by the 5th year of Beacon's charter.

According to the California Charter School Association ("CCSA"), the NWEA data for 2016-17 for this year can be viewed positively. CCSA's data management team went through Beacon's individual data results and saw an upward trend. Jonathan Slakey, MPP from CCSA said:

Please see the attached Excel (Exhibit I.G) for two sets of tables describing the way I see the situation at Beacon. Beacon has a high percentage of students testing below grade level in both Reading and Math. In 2015-16, 57% were Below grade level in Reading and 54% in Math. With all the operating difficulties Beacon faced, many parents took their students out of Beacon (the population fell by 70 students). Many of the students that left Beacon were achieving at or above grade level. As a result, many more students were Below grade level in Fall of 2016-17, 65% in Reading and 67% in Math.

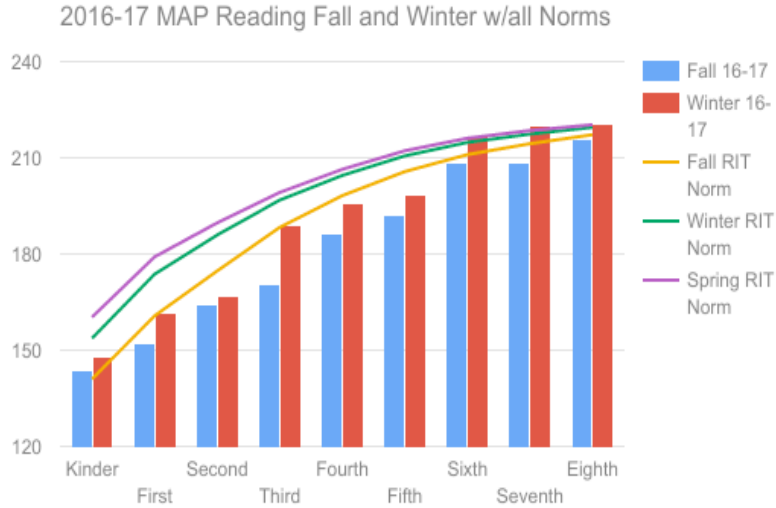
Despite this more challenging demographic, Beacon has made more progress with their Below grade-level population than they did in 2015-16. Even though we only have results from the Winter NWEA test, more Below Grade-level students have already grown at least a grade between Fall and Winter than below grade students grew the entire 2015-16 school year. 30% of Below Grade students grew a grade in Reading as of Winter 16-17, compared to 23% in all of the 2015-16 year, and 54% in Math as of Winter 16-17, compared to 30% for the 2015-16 year.

MAP Grade Level Charts

MAP grade level charts also demonstrate that each grade level of students are moving towards the end of year norm-referenced grade level markers.

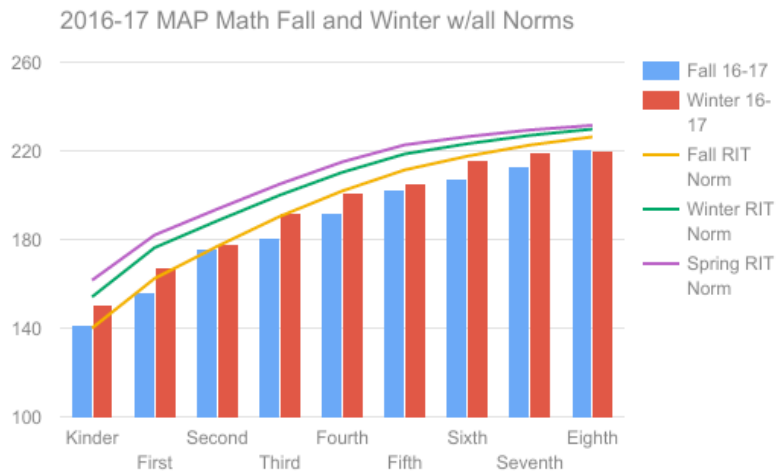
Overall, Beacon has demonstrated measurable progress toward its outcomes, and the academic performance of students is increasing.

MAP Reading 2016-17 Fall to Winter Norms



Our 1st, 3rd and 6-8th grade are showing strong growth in reading. The middle school grades were below the Fall norm in the Fall, but by Winter they met the Winter norm. This indicates better than average growth.

MAP Mathematics 2016-17 Fall to Winter Norms



Although on average the grade levels did not perform at grade level for the Fall norms in Math except for Kinder and second grade. However, our K, 1st, 3rd, 4th, 6th grades look more promising in growth towards norm proficiency. No grade level decreased, but 2nd and 8th grade appear stagnant in their Winter test results.

It's important to note that a significant number of the students, who joined Beacon this year, resulted in more students populating the Below Grade Level group on the MAP assessment than last year. And specifically, only 54.7% of the students tested this year were with us last year. In other words, 45.3% of the students tested this year are new to Beacon (Exhibit 1.H). This means that we cannot necessarily compare apples to apples.

The emphasis here is that Beacon faced a once in a life-time unforeseeable crisis, we did not have a normal school site from November 4 until February 13, yet progress was still made. We pushed through with our students still showing progress. We can only imagine the amount of progress if we had been able to remain in our facility the entire time. Based on the progress that was still made during the time period we were away from our facility, we are anticipating even further growth of our students' progress next year.

We believe we must work smarter with more tools in our repertoire to help our students increase in their understanding and application of learning. We need to chart progress even more closely. The MAP assessment can be utilized 4 times a year. Most schools only use the assessment 3 times a year therefore the Summer assessments are not normed. But we can test earlier in the year before the Summer window closes so that we can take advantage of more data to drive our instruction.

Testing Window Concerns

Beacon acknowledges the District's concern with the testing windows for this year's Fall and Winter MAP assessments. MAP's Fall testing window is 8/15 – 11/30, Winter is 12/1 – 2/28, Spring is 3/1 to 6/15. The 2-week assessing delay in the Fall and Winter was due to our facility displacement. This was the only time we tested outside the recommended

windows. An email from a MAP representative confirms this (Exhibit 1.I). Nevertheless, the MAP assessments provide comparisons for demonstrating this year's growth compared to last year's final scores.

Students who remained with us from the Fall to the Winter were included in the individual growth measures, except for those who were ill and could not test. Please note that differences in student numbers tested in the Fall to Winter were primarily due to the attrition caused by the displacement from our facility. Losing our facility for nearly 90 days from November 4, 2016 until February 13, 2017 was extraordinarily problematic. Our students were given independent study packets and to their merit, they returned them with a high completion rate. They received tutoring at the library with faithful participation. They went on several field trips, which they thoroughly enjoyed, and wrote about their experiences. We were at Bible Baptist Church for 19 days where we housed approximately 180 students in a gymnasium. Daily setup of our own portable walls, tables and chairs were routinely implemented each morning and taken down each afternoon. These circumstances were not the most conducive circumstances for teaching and learning. Nevertheless, as difficult as these conditions were, Beacon teachers did not skip a beat. The teachers monitored their students' progress with student work, online educational computer programs, tutoring, and assessments.

Though we have not yet raised 85% of every student starting at grade level by at least one year's growth towards proficiency or those below grade level by at least a half a year's growth in reading and math, we are even more committed to reaching this goal. We believe that it will be accomplished soon; otherwise, we would not have set such a goal. The good news is that preliminary data from MAP interim testing reports demonstrate student progress!

We know that each quarter, half year, and year we are arriving closer to that goal. Without the facility challenges we faced our second year, and with the increase of teacher training in math, language arts, classroom management, and English Language

Development (EL Achieve), and an accountability plan for the implementation of the new training (Strategic Improvement Plan), we will succeed even more rapidly.

Academic accountability is vital. We are taking necessary steps now to effectively evaluate our program regularly, make adjustments based on CAASPP, MAP, and classroom assessments data analysis results. When we reviewed our academic progress from last year, we made executive changes to increase our instructional minutes. Before this school year began, we adjusted our instructional schedule from 7:30 - 2:30 pm to 7:30 - 3:00 pm, excluding minimum days. We implemented all the intervention activities we had planned on. These interventions were provided before the District conducted its audit. We also made adjustments to our instructional program after the audit, in response to the District's recommendations, by implementing the EL Achieve program. Our commitment to student achievement is evident.

Correcting Issues Regarding Appropriate Curriculum and Use of Grade Level Text - RESOLVED

Last fall Beacon endeavored to write a competitive grant, the Public Charter School Grant Program (PCSGP) for \$575,000. Beacon was awarded this grant. It is a reimbursable grant. First the funds must be allocated or sourced from a lender, spent, receipts submitted, and then reimbursement would follow. Last year, Beacon was able to purchase more curriculum materials and bring professional trainers to Beacon who provided math, ELA, ELD, and other instructional training before the school year started and continued throughout the year. Prior to the commencement of this school year, Beacon had two weeks of teacher training in math and ELA, and continues to provide weekly professional development. After the District led audit, the District made recommendations, and Beacon followed up. *Beacon developed a Strategic Improvement Plan primarily on how to support the implementation of teacher training in the classrooms.* Although professional development was in operation, evidence of implementation was not reflecting the ideal success, especially on aligning curriculum and learning activities with the Common Core standards. However, some of the corrective adjustments included the reduction of our 10-

15 minute morning assemblies from four times a week to twice a week, and creation of a designated grade span English language development (ELD) time. The District recommended EL Achieve, a systematic designated ELD program that builds a solid language foundation and assists in moving EL students from one proficiency level to the next. We contacted EL Achieve for training (Exhibit 2). Beacon is appreciative of this guidance. However, the challenge occurred with their requirement process. In order to receive the training or purchase the curriculum, Beacon was required to participate in an overview of the program (orientation), which the company stated would not be offered until March 2017. We attended the March overview, signed a contract for 6 training institutes - 4 for this year, 2 for the summer. We also contracted for the summer leadership symposium, and purchased the curriculum (Exhibit 3). In the short time we have been introduced to the program and implementing their general strategies, we are seeing more students engaged with English development. Teachers kicked off their first EL Achieve unit on 5/1/17.

We also found two supplemental resource guides entitled *Scaffolding Instruction for English Language Learners: A Resource Guide for English Language Arts* (Exhibit 4) and *Scaffolding Instruction for English Language Learners: A Resource Guide for Mathematics* by Diane August and Diane Fenner (Exhibit 5). These guides provide teacher guidance for helping ELs with additional support for learning language and content concurrently. The guides describe research-based scaffolds and routines to assist ELs in meeting Common Core English Language Arts and Mathematics standards. Students learn how to understand words with multiple meanings, deduce unfamiliar vocabulary, identify archaic language, and acquire general academic and domain-specific words. The guide also explains how to differentiate to meet the needs of ELs at different levels of English proficiency by using scaffolding. The scaffolds are used to teach academic vocabulary across several days using a variety of techniques. It integrates oral and written English language instruction into content area teaching, provides structured opportunities to read for multiple purposes, develops written language skills, and capitalizes on students' home language skills and knowledge. The guide for mathematics includes a focus on the content

and practice: making sense of problems and persevering in solving them; reasoning abstractly and quantitatively; constructing arguments and critiquing the reasoning; mathematical modeling with appropriate tools, etc. The guide provides sample lessons with scaffolds to guide teachers in supporting student’s receptive skills to process new concepts, organize ideas, and acquire academic language. Scaffolds are useful in supporting student’s productive skills for communicating their mathematical thinking, and are employed with all levels of English language proficiency. With the implementation of *EL Achieve* and the *Scaffolding Instruction for English Language Learners* guides, Beacon is on a solid path for establishing an ELD program with demonstrated strategies that will permeate the entire curriculum.

Beacon acknowledges the District’s concern, and appreciates the District for the observation and guidance that our English Language Arts program could be more integrated, comprehensive, and more closely aligned with the Common Core State Standards (“CCSS”). While Beacon integrates an in-depth phonics program for emergent readers called *Spell to Write and Read*, a reading program called *Teaching the Classics*, which focuses on narrative comprehension at all levels (Exhibit 6), and the use of the *Core Knowledge Language Arts* program in the early grades, a program that is more comprehensive. To address the District’s concern, we have added specific curriculum and are expanding the use of the *Core Knowledge Language Arts*, which is mentioned in our Charter and is aligned to our Charter School petition’s focus on classical education and Common Core standards.

For our K-1 grades, we began implementing the *Core Knowledge Language Arts*, which is aligned to the CCSS and is designed to help students build the background knowledge and vocabulary critical to listening and reading comprehension through a variety of texts. We will implement the complete *Core Knowledge Language Arts program for grades 3-8* for the 2017-18 school year. Information about the K-5 Core knowledge Language Arts program is included: CKLA Skills Grades K-3, excerpts from the CA edition, FAQs: Core Knowledge, edreports.org – program meets expectations (*Exhibit 7*). Information about

the K-8 online program is included as *Amplify ELA: California Edition: Imagine Something Different (Exhibit 8)*. The use of Core Knowledge was the original plan as outlined in our petition, but at the time, the accompanying history curriculum was not available. Thus, we opted for another classical history curriculum, *Story of the World*, and other suggested classical literature that aligned with that curriculum. This program now provides better alignment with The *Core Knowledge Language Arts program*, which is a complete system “basal-like” program with teaching guides, practice, reteach, and enrichment activities and unit assessments. Additional information on Core Knowledge Common Core Curriculum can be found at the following websites.

<https://www.coreknowledge.org/product/core-knowledge-language-arts/> and <https://www.engageny.org/common-core-curriculum>. However, with only one quarter left this year, we implemented *The Buckle Down English Language Arts Common Core* for grades 3 through 8. It provides practice and in-depth coverage of the CCSS with targeted review and extensive practice using a variety of texts with open-ended questions.

The *Buckle Down English Language Arts Common Core* program will ensure that students are introduced to each of the key grade level standards. The program includes diagnostic pretests and post tests that target what skills the students know and what skills they need to learn. It matches the skills they need with specific lessons. Teachers can also target lessons to reteach skills with specific students. This program will continue to be used as a diagnostic intervention program for students at risk. A seventh grade curriculum sample is provided ((Exhibit 9).

Writing With Ease (grades 1-8) follows the classical tradition of copy work and narration exercises. It focuses on writing style, audience, grammar and punctuation skills, and Socratic literary discussions. Copy work consists of sentences that are 10-12 words in length, and narrations that increase to a minimum of five paragraphs. It provides a framework for literature discussions and applications. Exercises come from classic literature like *Alice in Wonderland* and *Little House on the Prairie*. It is also adaptable to other sources and narratives from a variety of subject areas from history, science, and

literature. Guidance for finding sources that contain specific teaching elements is provided. This program compliments our *Teaching the Classics* inquiry approach, the *Core Knowledge Language Arts program*, and the *Fix It Grammar* program for the upper grades.

The *Slingerland Multisensory Approach* for handwriting was also launched this second semester for our K-3 program. The *Slingerland Approach* is a classroom adaptation of the Orton-Gillingham method, which we use with our *Spell to Write and Read* in depth phonics program. This structured, sequential, multisensory teaching and learning approach is designed to support all students with speaking, reading, writing, and spelling through cursive and manuscript handwriting. It is specifically effective for students with learning disabilities.

Our new Language arts and ELD program will provide a thorough and integrated curriculum, and offer a complete language learning experience that will integrate language across the curriculum. Our curriculum as presented in our charter petition supports our classical education approach to literature. In our Response to the Notice of Violations an error was stated. Although it is an excellent practice to have a school board approve a school's curriculum, this was never stated in our petition; therefore there is no violation of noncompliance with Board approval of curriculum (Exhibit 10). If at anytime, however, a curriculum were selected that diverts our school from the classical approach, the Beacon board would have the authority to review and reject such a curriculum.

The District also expressed a concern that our math program was not cohesive. Although we have never strayed from the problem-solving Singapore approach, Beacon did struggle with finding a “just right” curriculum, one that provided sufficient teacher guidance and support, student practice, and diagnostic feedback. *Engage New York*, a Singapore math program for grades 1-4, is working out very well. Grades 5-8 are using the Singapore *Math in Focus* curriculum. As needed for intervention support, *Buckle Down Math Common Core* provides diagnostic and targeted support for skills the students need to learn. Teachers can target lessons to reteach skills with specific students. This program

will continue to be used as a supplemental diagnostic intervention program for students “at risk.” An eighth grade sample is included (Exhibit 11).

Correcting Issues Regarding Family Educational Rights and Privacy Act (“FERPA”)
RESOLVED

The Board approved a “FERPA” policy that was previously sent to the District. The Board recommended Beacon apologize to the affected families with face-to-face meetings whose student’s names were posted on the website without prior parent permission to post and to the parents of a subgroup whose number of students in the subgroup were identified. Upon notice from the District the student names on the website were blacked out. There were 13 students from the first group and 4 students from the second group. Beacon attempted to meet with all the families one family at a time either at the school or through actual home visits. Most of the families no longer attend Beacon, had non-working telephone numbers, moved with no forwarding address, and one of the families moved to Mexico.

Nevertheless, we contacted 13 out of the 14 families possible from the first group and all the families from the second group. We received 13 apology acknowledgements and have 3 certified mail receipts for 100% compliance. (Exhibit 12). **Correcting Issues Regarding Meeting Appropriate Number of Members Serving on Board of Trustees and Brown Act - RESOLVED**

We are building up our board both in numbers and in training. Board training in the Brown Act practices have been reviewed. Minutes have been amended to reflect proper procedures (Exhibit 13). The District had expressed a concern that there was no evidence of attempts to bring in new Board members. Although most of the communications were made by phone by Board members and myself, there is documentation that provides evidence of our attempts (Exhibit 14). It was a challenge to find qualified board members who were willing to work with us. Now we have a full board of 6 trained board members, and a pool of vetted and trained community volunteers ready to step in.

Correcting Issues Regarding Apparent Conflict of Interest / Violation of Government Code Section 1090 and Political Reform Act (Governance Code 8100) - RESOLVED

The Beacon board approved a Conflict of Interest policy that was previously sent to the District. A promissory letter for repayment of services was submitted and was approved by the Board (Exhibit 15). Please note that the correct amount of payment to Beacon is \$6,851.25. This amount includes payback of labor and the reimbursement of the cost of the materials paid to Mr. Van Nice. Additionally, it includes the payback of \$225 that was paid to Miss Van Nice for two training sessions she provided to the staff on how to work with students with special needs (autism spectrum, ODD, ADD, ADHD).

Correcting Issues Regarding Conditions and Standards, or Procedures - RESOLVED

Beacon understands the District's concerns regarding licensed contractors and has included copies of licenses, proof of skills or positions for the facility work that was rendered (Exhibit 16); except for the carpenter, who began as a parent volunteer, and demonstrated his skill in carpentry for the garden work that was requested, and for which he was compensated for. In the future, only licensed contractors will be hired.

Correcting Issues Regarding Misclassified Independent Contractors –RESOLUTION ADDRESSED (requires government and legal procedures)

We contracted Charter School Management Corporation (“CSMC”), a well-regarded back office company used by hundreds of charter schools across California, to handle our financial needs. Presently Beacon and CSMC are working closely with legal counsel to correct its tax filings with regard to substitute teachers who were mistakenly classified as independent contractors instead of Beacon employees. The plan is outlined as follows:

1. Identify each independent contractor substitute and calculate the total compensation paid to each (done);

2. File amended payroll tax reports with the Internal Revenue Service (“IRS”), Franchise Tax Board (“FTB”), and Employment Development Department (“EDD”) as applicable (in progress); and
3. Notify the affected parties as to the situation and provide them with updated tax forms as applicable (letters were sent and emailed and follow-up phone calls are in progress).

Beacon requests a confirmation from the District if these proposed actions satisfy the District. Please note, however, that this process will take time. Nonetheless, Beacon assures the District that it is addressing this violation in as expeditious a manner as possible.

On a related note, the District also had concerns as to whether Teachers On Reserve, the company we contract with to provide substitute teachers, paid their employee’s taxes and retirement. Please be aware that Teachers On Reserve is an independent company, which is solely responsible for ensuring that its employees are being paid properly. A statement from the company and our contract with them is provided (Exhibit 17).

Addressing Issues Regarding Fiscal Management - RESOLVED

Beacon submitted proof to the District of voided checks to confirm there were no missing checks (Exhibit 18). Here is a clarification of the issue: manual checks written at the school site were entered into ACCPAC (the professional accounting software utilized by CSMC) under the Payment Entry screen, which does not upload to CharterVision (the dashboard utilized by CSMC to provide easy to read school information to members of the school and its board). All manual checks were previously entered this way. However, when Beacon fully rolled out services with CSMC, we wanted to know why we could not see the manual checks in CharterVision dashboard. CSMC informed us that the only way for them to show up was to enter the checks as invoices in the Invoice Entry screen and then apply the payment. The Charter School’s financial statements have always been accurately reflected in ACCPAC. The use of ACCPAC, however, does not allow for changes to be made

without any sort of auditing trail. Checks cut manually outside of the automated A/P system do not populate in CharterVision's check runs. Only checks issued by CharterVision automated A/P system show up in the system. For CharterVision to accurately reflect the reports, all manual checks and their documentation need to be scanned and sent to the CSMC office for manual entry into the invoicing system promptly. To remedy this issue, it has been agreed that all checks are to solely come from CSMC's automated check processing system.

Regarding the "transfers" sequence listed in the violations by the District. These are not transfers. Those listings highlight all the bank transactions (withdrawals and deposits) made between the Charter School's three banking codes. ACCPAC is a sub-ledger system that provides details behind entries in the general ledger. See (Exhibit 18) for are all the transactions the District thought were considered missing.

An explanation of the three check sources that contributed to why checks were out of sequence is provided (Exhibit 18). Registers with missing details will no longer be an issue with tighter controls and the implementation of effective fiscal procedures.

Beacon has shown that there was never any fiscal mismanagement. Beacon will work more closely with CSMC to ensure that the School's procedures and CSMC's processing system are fully aligned.

Addressing Issues Regarding Justice Clearance and Fingerprinting - RESOLVED

The District was previously sent the two fingerprint records that were unintentionally missing from the batch of records that were provided to the District. The District now has a complete record of present and former employee fingerprint clearances. Beacon is willing to provide the District with additional future fingerprint clearances of newly hired employees upon request (Exhibit 19). *All Beacon employees have always been properly fingerprinted.*

Addressing Issues Regarding Affirmation of Nonsectarian - RESOLVED

The District accepted evidence that our school is nonsectarian, but still had concerns. The District requested to see the signed Second User Agreement (Exhibit 20). The District was concerned that our students might co-mingle with other private schools. For the past two years that we have participated in Pine Valley's secular camp program, we have only seen other public schools and charters participate and Pine Valley confirmed what other public schools have attended. This documentation was previously provided to the District. All the activities are conducted separately. Each school has their own camp leaders, cabins, and itineraries.

The District should acknowledge that the school site is a shared facility with a Church and that the Church has been very accommodating. The Church removes the cross from the shared gymnasium to their exclusive fellowship hall each week after their services. They also removed the inspirational pictures from the staff lounge, which serves as the Church's family room for families with young children during their Church services. The bibles in the lounge did not belong to any Beacon staff member, but were left there by Church members. The inspirational frames that remained in the school office, which was formerly occupied by the Church, belonged to the Church, and these were also removed immediately upon District guidance.

Our first curriculum map of ancient history across the grades included books from ancient cultures such as the *The Story of the World Volumes 1-4*, *The Usborne Book of World History*, *Encyclopedia Of The Ancient World*, *The Kingfisher History Encyclopedia*, *The Usborne Internet-Linked Encyclopedia Of World History*, *The Usborne Encyclopedia of World Religions*, *The Children's Illustrated Bible*, *The Broken Tusk: Stories of the Hindu God Ganesh*, *Tales From The Odyssey Part 1 And 2*, *Traditional Irish Fairy Tales*, *The Ch'i-Lin Purse: A Collection Of Ancient Chinese Stories*, *In The Beginning: Creation Stories From Around The World (Mythology)*, *Tales Of Ancient Egypt*, *The Egyptian Cinderella*, *Tales Of Greek Heroes*, etc. (Exhibit 21).

We reaffirm that we do not teach religion. We teach about religion in our classical studies. Our school families are from diverse religious and nonreligious backgrounds. As public servants, we honor the family's right to teach or not teach their own children religion.

Ongoing Support and Training

Beacon is now availing itself and utilizing all of the resources available through our membership in the California Charter Schools Association ("CCSA") such as: webinars, workshops for training sessions on various areas of charter school operations and finance, attendance at regional meetings where charter school leaders share best practices and policies for success with each other. We also have opportunities to network and find board members through CCSA's contacts at Young Non-Profit Professionals and University of San Diego ("USD")'s Leadership Governance Program.

Most importantly, CCSA's Mentor Program, where new charter leaders are paired with mentors who themselves are successfully leading charter schools. A cadre of experienced successful charter school leaders will mentor Beacon for the next two years. We see continuous improvement for our school as we take full advantage of this very engaging program.

Additionally, we are also members of Charter School Development Center, another charter school organization that supports new charter in business operations, finance, policy, governance, and more. We have attended business and finance training classes and have ongoing access to their online resources. Mr. Navarro and Dr. Van Nice both participated in the Chief of Business Officer ("CBO") training. The CBO Training Program consisted of 15 modules that covered the most critical topics that charter school business managers need to know, including: Introduction to California's K-12 School Finance, Charter School Funding System Fundamentals (Including LCFF & LCAP), Categorical Programs Management, Charter School Attendance Accounting, Charter School Financial Accounting, Budget Development & Monitoring, Cash Flow Management, Charter School Auditing Process, Long-Term Budget Projections & Planning, Fiscal Oversight, Solvency,

& Monitoring, Special Education Finance, Facilities Financing Fundamentals, Personnel & Labor Relations, Risk Management & Benefits, Time Management (Exhibit 22).

IN CONCLUSION

We acknowledge that during our infancy, the Charter School had some issues. Beacon had a steep learning curve as we started out – just as any new school has. We reviewed the District’s assessment, corrected issues, and further improved upon the solutions. We are constantly looking at ways to improve everything we do. Our school is small, but is operating more efficiently with divisions of labor. We have implemented hard actions and are already showing improvement in all areas, but especially on how we look at, analyze, and use student academic data. Through our improved data analysis efforts, we know exactly which students need help and what they need help in, and we are targeting intervention for those specific students. We are doing everything we can to service our Beacon families.

Parents choose Beacon for their children. Can we together honor their choice? We feel that it would be a major disservice to stop the momentum, to topple the structure, and abandon the children’s sense of belonging here at Beacon. It’s taken a tremendous team effort to plow the ground, dig the footings, and set the solid foundation. Beacon is a work in progress, which includes the forms and the raw materials. We have the current working assets: the scaffolds, the bricks, and the mortar to build the tower, to finish the project, to fulfill the dream. Our logo, the lighthouse, is a symbol used for overcoming challenges and adversity. It is most commonly used to represent a guiding light for navigating through the world. If allowed to finish its term, Beacon will have a chance to fulfill its vision and become a model school, lighting the way for students to overcome learning obstacles, and igniting in them a passion for learning, and impacting our community, society, and world in a positive way.

When Beacon was homeless, no one outside of Beacon expected the little Charter School to survive, but to everyone's amazement we did. We were singled out by the media, ridiculed, and slandered. Few outsiders, if any, counted on our tenacious spirit, "the little engine that could." Our die-hard families would not give up, our teachers were stalwart in their planning and student work evaluation, and our students, our Beacon light bearers, worked hard and made progress. *This sense of community, teamwork, and fortitude is vast!*

Beacon has the resolve to survive and we also have the capacity to thrive. Please hear our hearts and tenacity to pursue further years of success. Please do not discount our relentless efforts. By now, the District has seen our drive and caught a glimpse into our souls. We are a passionate, eclectic group of idealists, driven and bound together by a vision of beauty. Our fortitude is proof that we are genuine and are willing to do whatever it takes to realize the vision. We will never give up, and we're willing to work together with the District to be a Charter that you will be proud of. We are strong-willed and thick-skinned to the thunderstorms of calamity that has ripped through the fiber of our existence. Yet our daunting, unrelenting determination will ride out the wave, overcoming whatever obstacles confront us. We are a community that has been melded together and strengthened by passionate hearts despite adversity.

Can we work together? Have more open dialogue and collaboration? Can we mend the open issues so we can both have a fresh start together for the sake of the children and parents who selected Beacon as their school of choice?

We would greatly appreciate the opportunity to end counsel fees (on both sides) so that the funds can go directly to the children and their education. Is our Response to the Revocation of our charter adequate in your opinion? In our opinion, we have noted and addressed all of the violations adequately. Can we now abort this legal proceeding to attempt to revoke the charter?

Beacon was granted a five-year term for a purpose. It's an active project that is still in the works. Now that all the operational issues have been addressed, and the students are making progress, please allow Beacon to move forward. What we want for our students is really no different from what the District wants, not just college readiness, the bricks, to build a career, but the mortar to build a life, the pursuit of happiness. We are laying the bricks, for a life of benefit to society, and the mortar is the "life readiness" skills for a truly successful life. The Greek noun for a life well-lived, one that promotes human flourishing is called *eudaimonia*. A life of *eudaimonia* is a life of striving for the best. It's a life of pushing yourself to your limits, and finding fulfillment in the quest. An *eudaimonistic* life will be full of the happiness that comes from achieving something really difficult, rather than just having it handed to you. This is the kind of life that the Beacon community aspires for their children. We believe it is one that the District would agree is truly a life worth living; a life of purpose that nourishes the soul in order to give back to our society.

CCSA has 24 years of experience in working with charters in California and understands the challenges of new charters. They recognize that it takes time to establish a school. They believe schools, like Beacon should be given an opportunity to finish their 5-year term.

When Beacon is compared to other similar charter schools in years, demographics in English language learners, Title 1, and "at risk" students, Beacon falls within the range of similar CAASPP performance. CCSA, however, does not see Beacon as stagnant, but sees the Charter as a school with potential based on the positive growth demonstrated by this year's progress.

The Beacon staff is dedicated; works hard, and our efforts in the implementation of curriculum trainings, especially high quality English language development through EL Achieve will pay off in positive student achievement dividends. Closing down a school with such a devoted and committed staff, parents, and students would be a great injustice to the community. Please vote to allow Beacon to finish its course.