Julia Hosford Barnes, P.C.

Legal Memorandum

To: PEC
From: Julia Barnes
Re: Review of San Diego Riverside Charter School Revised Condition

I have been asked to review the sufficiency of the revised Condition documentation provided by San Diego Riverside Condition.

First, given that this information is being provided so late in the year, this now is more of a report on what the school has done on the Condition and will provide final data on in 60 days, rather than a revision to the Condition Compliance form and what the school will commit to do. If this is a list of what has been done, then there should be clarity of what the school is saying in some instances, the school should provide final data on these items in July and then CSD should analyze this list in July 2025.

Second, this is intended to be a document regarding what the school will do each year to comply with the Condition, is the school committing to this as a commitment for each year? If this is a commitment of the school for the next years of the charter term (one more year of data prior to the renewal is submitted), then the document should be clarified to identify what is intended and what will be uploaded to show compliance in future years through documentation uploaded to Epicenter.

At this point, the PEC might consider these two issues separately.

There are few overall comments on the document as a form to outline what the school will do:

A) There continue to be missing items or unclear items.
B) There is no indication of what will be provided as documentation and by what date. This type of clarity has been provided in the other conditions approved by the PEC and are missing here.

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The following are comments looking at each section of the Condition outlined by the PEC:

The Public Education Commission (PEC) has voted to renew San Diego Riverside Charter School for a three-year term from July 1, 2024 to June 30, 2027 with the following Conditions:

1) **That data from the 2023-2024 school year will be considered as a baseline to show improvement during the 2024-2027 contract term;**
2) **That the school will complete a Transition Year Checklist that is approved by the PEC and which shall include any unaddressed items identified from the Jemez Valley Public School Corrective Action Plan;**

Satisfied previously

3) **That the school will hire mentor(s) for the administration and governing board to assist in the creation of a strategic vision and plan for the school to achieve the growth goals for the students and ensure that the governing board is providing effective, adequate oversight;**

The school will continue working with mentor(s) from PCSNM for the administration and governing board to assist in the creation of a strategic vision and plan for the school to achieve the growth goals for the students and ensure that the governing board is providing effective, adequate oversight.	This looks sufficient to meet the Condition

4) **That the school's record of performance for the charter school term demonstrates:**
   a. **Student academic growth beginning with specific immediate action to correct student academic growth that is presently below state standards including identification of a robust strategic educational plan and a comprehensive teacher training program;**

Student Academic Growth	These look to be sufficient once clarified.
In both Reading and Math, 40% for 2024-25 from MOY to EOY, in subsequent years, 70% in both content areas from BOY to EOY.	This language is unclear and needs to be clarified in order to be understood. • What is the assessment? • What do the 40% and 70% refer to? An increase from first score to second score on that assessment per student for all students? On average for all students? • How does that match the growth scores set out in the short cycle assessment tool? • Are math and reading reported separately? • What report will be provided? • Is there some type of rollup? This needs to be clarified in a manner similar to the way that mission goals are articulated
Individualized Learning Plans, completed on April 4	It is unclear if these were developed early in the year and are being completed now.
High-impact tutoring opportunities for students through PEC Special Project Grant Mach 17-May 30	
Summer Reading Program (NMPED)	Is this being offered to students or required for students?
Comprehensive teacher training program	These look to be sufficient. This condition is ongoing. Is this a commitment to do these trainings each year?
-LETRS training -CLR Deep Dive Institute -Agile Mind Math -Winter Special Education Academy	

-SPED Spring Academy -Charter School Testing Services (Data) -Observations at identified high performing charter schools	
Support with identifying/progressing ELs (Dr. Ayanna Cooper)	
Reestablishment of Friday all staff meetings/PD/PLCs	
Comprehensive teacher evaluation process as established by Elevate NM	

b. Sufficient tribal consultation to ensure that the Jemez Pueblo leadership and Jemez Pueblo Education Department are consulted on key Pueblo issues including consultation on the Towa language curriculum, and the outcomes of tribal consultation reflect that the Jemez Pueblo and Jemez Public Education Department concerns are addressed;

Sufficient tribal consultation to ensure that the Jemez Pueblo leadership and Jemez Pueblo Education Department are consulted on key Pueblo issues including consultation on the Towa language curriculum	
Key Pueblo issues discussed	No list is defined to confirm that these issues have been addressed
Consultation on Towa language curriculum	Nothing identified and nothing identified as to the Towa curriculum at the school
Schools identifies the following plan	
Visit to the Pueblo library Meeting with Pueblo of Jemez Dept of Education and meeting with Tribal Governors	The document does not identify who is going to the library and for what purpose Meeting dates are identified

	Please note that there are more requirements under tribal consultation. However, that may be assessed in the Performance Framework.

c. Satisfactory oversight is provided by a trained, legally compliant governing board that operates as required by the Open Meetings Act including providing an adequate head administrator evaluation process and evaluation tool that conforms to national best practices; and

Nothing provided in plan

d. Conformance with generally accepted standards of fiscal management beginning with specific immediate action to correct the unsatisfactory performance related to fiscal management, which must include oversight by a trained legally compliant finance and audit committee, adequate internal control policies and procedures and improved audits.

Nothing provided in plan