THE SUNY CHARTER SCHOOLS INSTITUTE

SCHOOL EVALUATION REPORT
LAMAD ACADEMY CHARTER SCHOOL
VISIT DATE: MARCH 14–15, 2023
REPORT DATE: MAY 18, 2023

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The State University of **New York**

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INTRODUCTION

INTRODUCTION

This School Evaluation Report offers an analysis of evidence collected during the school visit to Lamad Academy Charter School ("Lamad Academy") on March 14-15, 2023. While the SUNY Charter Schools Institute (the "Institute") conducts a comprehensive review of evidence related to all the State University of New York Charter Renewal Benchmarks (the "SUNY Renewal Benchmarks") near the end of a charter term, most mid-cycle charter school evaluation visits focus on a subset of these benchmarks addressing the academic success of the charter and the effectiveness and viability of the charter school organization. It provides a framework for examining the quality of the educational program, focusing on teaching and learning (e.g., curriculum, instruction, assessment, and services for at-risk students), as well as leadership, organizational capacity, and board oversight. The Institute uses the established criteria on a regular basis to provide schools with a consistent set of expectations leading up to renewal.

Appendix A to the report contains a Charter Overview with descriptive and historical information about the school, as well as background information on the conduct of the visit. Together this information puts the visit in the context of the school's current charter cycle. Appendix B provides the SUNY Renewal Benchmarks.

This report does not contain an overall statement that would specify the school's prospects for renewal. Rather, it serves as a summary of the school's program based on a subset of the SUNY Renewal Benchmarks. The Institute intends this selection of information to be an exception report in order to highlight areas of concern. As such, limited detail about positive elements of the educational program does not indicate the Institute does not recognize the program's overall effectiveness.

CB
CHARTER
BACKGROUND

CHARTER BACKGROUND

LAMAD ACADEMY CHARTER SCHOOL

1060 Clarkson Ave, Brooklyn, NY 11212 |**Grades: 6-8**| **NYC Community School District 18**

The State University of New York Board of Trustees (the "SUNY Trustees") approved the original charter for Lamad Academy on October 18, 2018. The charter opened in fall 2020, charted to serve 125 students in 6th grade.

" MISSION

To prepare and inspire students to successfully and enthusiastically pursue advanced mathematics and science education in their secondary and post-secondary careers. With American economic and national security dependent on the development of a scientifically-trained and technically-skilled workforce, Lamad Academy will graduate a cadre of such future talent by immersing its students in an academically rigorous standards-based curriculum with a principal emphasis on mathematics and science.

CURRENT CHARTER

Serves: 6th– 8th

Chartered Enrollment: 175

Charter Expiration: July 31, 2025

KEY DESIGN ELEMENTS

Co-teaching model and reduced class sizes;	✚
Differentiated and small-group instruction;	✚
A culture of inquiry and critical thinking;	✚
Rigorous mathematics and science curriculum;	✚
Emphasis on vocabulary development, writing skills, grammar, and etymology; and,	✚
Extended day and extended year programming.	✚

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EXECUTIVE
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EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

Lamad Academy seeks to prepare and inspire students to pursue advanced secondary and post-secondary education pathways in mathematics and science. In its commitment to serve students of color from low-income backgrounds, the school primarily recruits from New York City Community School District 18 and offers extensive tutoring along with extended day and extended year programming to provide students with high levels of individualized support and more time on task. Lamad Academy has also developed a comprehensive social emotional learning ("SEL") curriculum that gives students multiple opportunities throughout the school day to engage in social emotional check-ins with staff and peers.

In 2022-23, Lamad Academy addressed gaps within its instructional leadership team by hiring two part-time consultants to provide teacher coaching and curriculum design in English language arts ("ELA") and mathematics. During its evaluation visit, the Institute observed a consistent focus on schoolwide learning objectives across classrooms and the application of instructional strategies to promote student voice and classroom discourse. Lamad Academy has the opportunity to expand structures for ensuring horizontal and vertical alignment of content across classrooms. The school's next round of summative internal and state assessment scores will provide evidence as to whether its new curricular materials, expanded instructional leadership team, and systems for supporting instructional delivery positively impact student outcomes.

In 2021-22, the first year when the charter produced data suitable for analysis on New York State's 3rd–8th grade ELA and mathematics exams, Lamad Academy did not meet its ELA or mathematics goals. As a result, Lamad Academy's prospects for earning full term renewal are currently in jeopardy. In order to establish the best case for renewal, the charter must improve its academic performance from these baseline results.

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ACADEMIC
PERFORMANCE

ACADEMIC PERFORMANCE

2021-22 CHARTER PERFORMANCE REVIEW

At the beginning of the Accountability Period,[1] the school developed and adopted an Accountability Plan that set academic goals in the key subjects of ELA and mathematics. For each goal in the Accountability Plan, specific outcome measures define the level of performance necessary to meet that goal. Throughout the charter term, the Institute examines results for five required Accountability Plan measures on an annual basis and provides an Accountability Dossier to each school detailing the school's progress toward meetings its Accountability Plan goals. Because the Act requires charters be held "accountable for meeting measurable student achievement results"[2] and states the educational programs at a charter school must "meet or exceed the student performance standards adopted by the board of regents"[3] for other public schools, SUNY's required accountability measures rest on performance as measured by statewide assessments. More information about the required Accountability Plan measures can be found on the Institute's website.

Lamad Academy did not meet its ELA goal in 2021-22. With 17% of students enrolled in at least their second year scoring at or above proficient on the state's ELA exam, the charter performed 58 percentage points below the absolute target of 75% and 23 percentage points under the district's results. Among all tested students, the charter posted a 21% proficiency rate. Lamad Academy posted an ELA effect size of-1.59 according to the Institute's comparative performance analysis. This level of achievement fell far below the target of 0.3 and indicates that the school performed lower than expected in comparison to schools across the state enrolling similar percentages of economically disadvantaged students.

Lamad Academy also did not meet its mathematics goal in 2021-22. That year, only 2% of the school's students enrolled in at least their second year scored at or above proficient on the state's mathematics exam. This level of performance was 73 percentage points below the absolute target and 17 points lower than the district. In comparison to schools across the state enrolling similar percentages of economically disadvantaged students, Lamad Academy performed lower than expected according to the Institute's effect size analysis.

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1. *Because the SUNY Trustees make a renewal decision before student achievement results for the final year of a charter term become available, the Accountability Period ends with the school year prior to the final year of the charter term. In the case of initial renewal, the Accountability Period covers the first four years of the charter term.*

2. *Education Law § 2850(2)(f).*

3. *Education Law § 2854(1)(d).*

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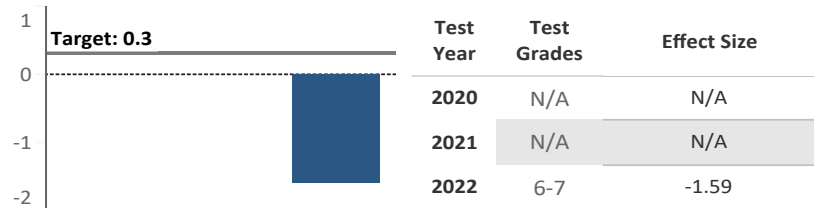PERFORMANCE

ACADEMIC PERFORMANCE

LAMAD ACADEMY CHARTER SCHOOL

ENGLISH LANGUAGE ARTS ACCOUNTABILITY PLAN GOAL

District Comparison. The percentage of students at **the charter** performing at or above proficiency in ELA compared to the district.
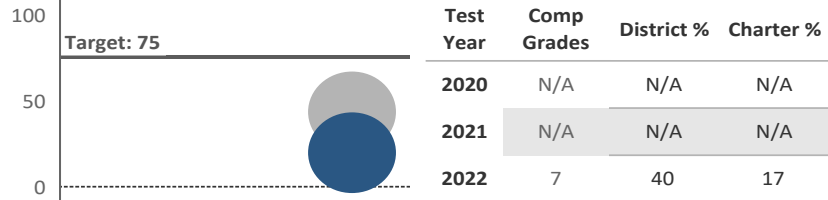
Target: 75

Test Year	Comp Grades	District %	Charter %
2020	N/A	N/A	N/A
2021	N/A	N/A	N/A
2022	7	40	17

Effect Size. The chart shows charter's effect size above its predicted level of performance in **ELA** according to a regression analysis controlling for economically disadvantaged students among all public schools in New York State.

Target: 0.3

Test Year	Test Grades	Effect Size
2020	N/A	N/A
2021	N/A	N/A
2022	6-7	-1.59

Comparative Growth Measure: Mean Growth Percentile. The charter's unadjusted mean growth percentile for all students in grades 4-8 will be above target of 50 in **ELA**.

Target: 50

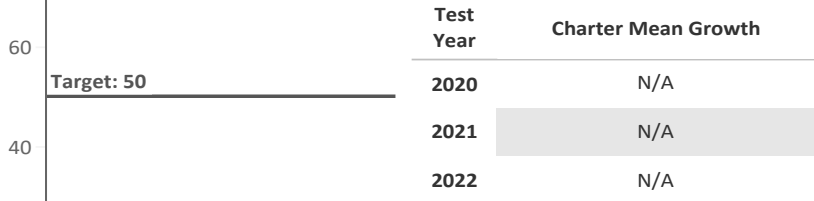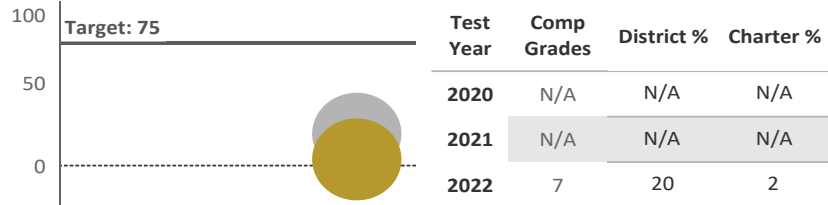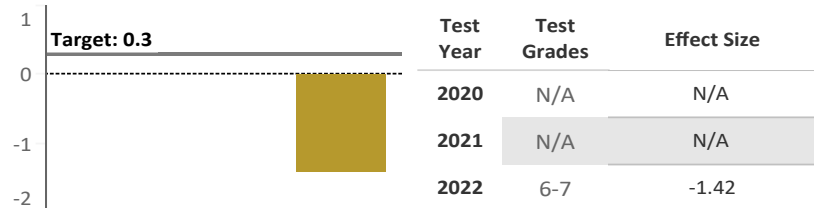| Test Year	Charter Mean Growth
2020	N/A
2021	N/A
2022	N/A

MATHEMATICS ACCOUNTABILITY PLAN GOAL

District Comparison. The percentage of students at **the charter** performing at or above proficiency in mathematics compared to the district.

Target: 75

Test Year	Comp Grades	District %	Charter %
2020	N/A	N/A	N/A
2021	N/A	N/A	N/A
2022	7	20	2

Effect Size. The chart shows charter's effect size above its predicted level of performance in **mathematics** according to a regression analysis controlling for economically disadvantaged students among all public schools in New York State.

Target: 0.3

Test Year	Test Grades	Effect Size
2020	N/A	N/A
2021	N/A	N/A
2022	6-7	-1.42

Comparative Growth Measure: Mean Growth Percentile. The charter's unadjusted mean growth percentile for all students in grades 4-8 will be above target of 50 in **mathematics**.

Target: 50

Test Year	Charter Mean Growth
2020	N/A
2021	N/A
2022	N/A

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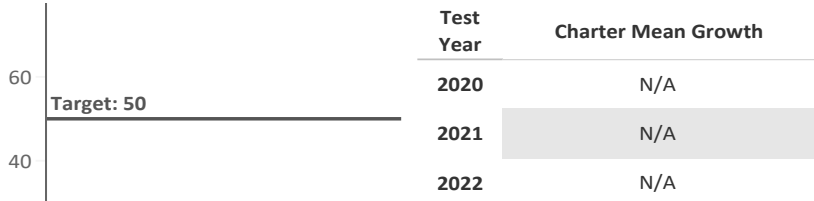
ACADEMIC PERFORMANCE

LAMAD ACADEMY CHARTER SCHOOL

SCIENCE ACCOUNTABILITY PLAN GOAL

Science: Comparative Measure. The percentage of students at **the charter** in at least their second year performing at or above proficiency in science compared to the district.

N/A

SPECIAL POPULATIONS PERFORMANCE*	
	2022
Students with Disabilities Enrollment	30
Tested on State Exam	26
Charter Percent Proficient on ELA Exam	7.7
District Percent Proficient	20.1
ELL Enrollment	0
Tested on NYSESLAT Exam	0
Charter Percent 'Commanding' or Making Progress	N/A

* The academic outcome data about the performance of students receiving special education services and English language learners ("ELLs") above is not tied to separate goals in the charter school's formal Accountability Plan. The NYSESLAT, the New York State English as a Second Language Achievement Test, is a standardized state exam. "Making Progress" is defined as moving up at least one level of proficiency. Student scores fall into five categories/proficiency levels: Entering; Emerging; Transitioning; Expanding; and, Commanding. In order to comply with Family Educational Rights and Privacy Act regulations on reporting education outcome data, the Institute does not report assessment results for groups containing five or fewer students and indicates this with an "s".

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QUALITATIVE BENCHMARK ANALYSIS

The SUNY Renewal Benchmarks, grounded in the body of research from the Center for Urban Studies at Harvard University,[4] describe the elements in place at schools that are highly effective at providing students from low-income backgrounds the instruction, content, knowledge, and skills necessary to produce strong academic performance. The SUNY Renewal Benchmarks, found in Appendix B, describe the elements an effective charter school must have in place at the time of renewal.[5]

ASSESSMENT

Lamad Academy has a comprehensive student performance assessment system, and it is continuing to build data usage routines that inform instructional effectiveness. However, the charter does not formally evaluate teacher performance using student assessment results, and it is unclear how the charter uses assessment data to identify priorities for professional development and teacher coaching.

Lamad Academy administers i-Ready and Fountas and Pinnell Benchmark Assessment System ("F&P") assessments to track student performance each trimester, and the charter recently adjusted its assessment calendar to ensure teachers have access to baseline performance data at the beginning of the year. As a result, teachers are better equipped to provide early intervention and differentiated instruction for students struggling academically. Lamad Academy also intends to onboard a staff member to serve as a full time data analyst in the 2023-24 school year to ensure that staff members have ongoing access to assessment data. At the time of the visit, the charter works with an external data analysis provider and has experienced delays in accessing data to inform academic interventions and professional development topics. To improve the validity and alignment of its internally designed benchmark assessments to standards, Lamad Academy now includes released ELA and mathematics items from the state tests in its benchmark exams. As of the evaluation visit, teachers and instructional leaders report early growth based on benchmark assessment results and anticipate further growth on March 2023 assessments. Staff members partially attribute this growth to the increased validity of benchmark assessments but have yet to expand the new assessment methodology to other content areas.

CURRICULUM

Lamad Academy is in the early stages of establishing a curricular framework in ELA and mathematics that is aligned to state standards, and at the time of the Institute's visit, the charter did not have a preponderance of assessment data to demonstrate the impact or effectiveness of its new programming. As part of its effort to revamp its curricular offerings, Lamad Academy hired two part-time instructional coaches in the 2022-23 school year to lead a comprehensive redesign of its ELA and mathematics programming. To begin this process, the consultants conducted a needs assessment by observing classrooms, conferencing with teachers, and reviewing existing documentation and performance records. From this information, the consultants

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4. An extensive body of research, including a report from Harvard and a report from the United States General Accounting Office, identifying and confirming the correlates of effective schools exists dating back four decades.

5. Additional details regarding the SUNY Renewal Benchmarks are available on the Institute's website.

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created both a short and long term strategic plan to address critical needs within the school's curriculum and pedagogical frameworks for ELA and mathematics. In ELA, the instructional coach determined that the school needed a two-phase curriculum rollout to begin raising student achievement as quickly as possible. Lamad Academy is currently in the first phase of this rollout, which calls for teachers to focus on building student proficiency in reading and writing fundamentals using a scripted Reading Zone curriculum. Within the Reading Zone framework, scripted lesson plans allow teachers to devote a majority of planning time to developing instructional delivery in response to coaching feedback. Reading Zone content helps students create a 'plan of attack' for analyzing reading by giving them frequent exposure to passages and novels from a variety of genres, and teachers use a mastery tracker to mark student progress and to plan the re-teaching of content as needed. In the second phase of the rollout to occur during summer pre-service training, the school will select and launch a comprehensive ELA curriculum along with curricular maps, pacing guides, and unit plans.

As Lamad Academy is in the early stages of implementation for its new ELA programming, it has not gathered a full year of assessment outcome data to demonstrate the impact of the current approach. However, leaders are aware of the need to monitor and reflect on the effectiveness of the programming, and the instructional coach cites proof of impact via observational data pertaining to teachers' consistent implementation of differentiation, modeling, and scaffolding techniques.

In mathematics, Lamad Academy hired an instructional coach from the National Training Network ("NTN") to lead the school through a two-part redesign of its mathematics programming using NTN curriculum.   However, unlike ELA, mathematics teachers must create lesson plans and submit them each week for feedback from the grade team leader who also serves as interim instructional coach. Teachers then meet in person each week to ensure that lessons include a common set of features including standards alignment, prior knowledge access points, student misconceptions, success criteria, and checks for understanding. Teachers also practice instructional techniques and provide each other with feedback. Teachers report that content area meetings are instrumental to their practice, but also cite that they do not currently have the opportunity to plan collectively for the vertical progression of standards across grades. This lack of collective planning represents a missed opportunity to ensure that students possess the full range of prerequisite skills to access grade level content as they advance each year. Furthermore, the scarcity of collaborative time prohibits the sharing of best practices and materials across grades.

For the upcoming school year, Lamad Academy school leaders will transition its instructional coaching positions into full time roles to expand internal capacity to conduct observations, provide feedback on instruction, and monitor implementation of professional development content. The upcoming school year will also encompass the second phase of its mathematics curriculum roll out, with the school adopting the Amplify mathematics curriculum, scripted lesson plans, increased common planning time, and pacing guides for teachers.

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PEDAGOGY

Lamad Academy teachers have effective classroom management techniques and create a consistent focus on academic achievement representing a positive change from the previous evaluation visit. In ELA, teachers deliver purposeful lessons with clear objectives aligned to the school's curriculum and a consistent focus on academic achievement. The Institute observed the schoolwide focus on improving student reading comprehension outcomes with teachers modeling the annotation of passages and the citation of evidence to support the main idea of a text. During independent practice, teachers circulate and confer with students to give individualized feedback as they work to compose main idea paragraphs. For whole group instruction, teachers regularly pose higher-order thinking questions and checks for understanding, although students display inconsistent levels of participation and engagement in classroom discourse.

In the majority of mathematics classrooms, teachers state measurable learning objectives and clear directions so students know what to do at each stage of a lesson.   During whole group instruction and independent work, teachers commonly confer with students and prompt students to explain how they arrived at an answer. However, across subject areas and grades, teachers do not promote rigor during student discourse by prompting students to rethink or extend upon partial or inaccurate responses. The Institute observed instances in which teachers displayed a lack of intellectual preparation to teach content or a lack of ability to redirect students who were struggling with content. Regarding differentiation, Lamad Academy instructors employ a variety of methods to differentiate content while leveraging co-teachers and teaching assistants to deliver instruction in small groups. For instance, the school offers an "Hour of Power" twice per week in which students receive individual coaching in their lowest scoring areas from recent benchmark exams. Students below grade level also have the opportunity to attend Saturday school to work on the weakest standards from the previous state exam. Lamad Academy also contracts with a academic intervention services ("AIS") service provider to offer daily tutoring sessions during school hours. In 8th grade, advanced students take on leadership roles in the classroom, creating anchor charts, leading instruction, and facilitating debates around problem solving approaches to help peers stay engaged.

Across classrooms, Lamad Academy teachers maintain a positive, warm learning climate, and students exhibit minimal instances of behavior. However, upticks in off-task behavior and lost instructional time occur throughout the day due to inefficiently managed transitions.

INSTRUCTIONAL LEADERSHIP

The Lamad Academy principal and executive director are in the process of redesigning the school's instructional leadership team following the departure of the assistant principal in fall 2022. At the time of the visit, the school was not equipped to provide full time coaching support to teachers, and the principal takes a more active, daily role in facilitating the instructional program with the help of external consultants. In mathematics, a coach from NTN provides support one day per week and a veteran mathematics teacher provides coaching assistance while maintaining a full time teaching schedule. In ELA, the school employs a part-time instructional coach who reports to the school in-person two days per week while providing additional support as needed virtually. The charter also contracts a part-time data analyst to provide detailed reporting of student assessment performance.

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In the fall of 2023, the charter will launch an expanded coaching model with an instructional leadership team comprised of full time ELA, mathematics and science coaches, and lead teachers in model classrooms. The new leadership structure will extend the current data analyst position into a full time role, tasked with collecting and disseminating data pertaining to academics, intervention services, behavior management, social-emotional learning, and mental health services. The current professional development program is a mix of content related to new teacher onboarding, instruction, and behavioral topics that does not yet reflect the vision espoused by the school leadership. The vision provided would include more robust teacher voice in planning and assessing professional learning, as well as ongoing cycles of data-driven instructional focus areas, informed by classroom observations, and aligned to student performance assessment windows. Teachers also have frequent opportunities to collaborate and plan in grade level configurations. However, there is not yet a system in place for assessing the effectiveness of this collaboration and planning time.

At the time of the visit, the Institute noted that the consultants who currently serve as teacher coaches in ELA and mathematics do not have supervisory authority over teachers, nor do they have sufficient opportunities to corroborate feedback with the Lamad Academy principal. As a result, teachers report that the feedback they receive from coaches, although rooted in school priorities, feels disconnected from the feedback they receive from the principal during informal and annual formal evaluations.

AT-RISK PROGRAM

Lamad Academy offers comprehensive programming to meet the educational needs of students at risk of academic failure as it provides special education teacher support services ("SETSS"), AIS tutoring, integrated co-teaching ("ICT"), push-in English Language Learner ("ELL") services as well as considerable social-emotional support and counseling. At the time of the Institute's visit, however, it was unclear how charter leaders incorporate at-risk service staff members into the larger instructional team or how the charter evaluates the quality of these systems.

Currently, the school identifies students for academic intervention using a multi-tiered Response to Intervention ("RTI") model. In this model, students who struggle with content in the general education setting receive targeted tier 2 intervention services from an AIS provider, and general education teachers review i-Ready assessment results every six weeks to track student progress. Teachers also use i-Ready assessment results to determine the reteaching of content, to plan for differentiated and small group instruction, and to create academic action plans for students in collaboration with their families. Students who do not respond to tier 2 interventions go on to receive tier 3 intervention which involves longer or more frequent targeted instruction. Students who do not make adequate progress after tier 3 intervention become eligible to undergo evaluation through the district committee on special education ("CSE").

At the time of the evaluation visit, the Institute found that Lamad Academy AIS providers, SETSS teachers, ELL teachers and general education teachers have separate, independent systems for collecting student progress monitoring data, and that there are no meeting structures or central data repositories in place to support a streamlined coordination of intervention efforts. Furthermore, the charter's special education coordinator

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also serves as the full-time school counselor, which further limits opportunities for co-planning. As a result, the charter often fails to provide enough notice to teachers to provide progress monitoring notes, which leads to delays in completing annual Individualized Education Program ("IEP") review meetings and the inability to ensure that students receive services in the least restrictive environment in accordance with their IEPs.

There is some formal coordination between the classroom teachers and at-risk program staff members, and all teachers have access to lesson plans on a shared drive that allows them to plan support services aligned to classroom objectives. However, most coordination is informal, and the charter provides limited support to general education teachers and at-risk teachers in planning, coordinating, and implementing effective intervention strategies. Furthermore, the charter's professional development program does not sufficiently support general education teachers in leveraging performance data to plan interventions. SETSS teachers receive professional development from their independent agency.

In the spring of 2022, the Institute cited that Lamad Academy had not implemented an effective use of ICT teaching models to support student learning needs. As of the spring 2023 visit, Lamad Academy has yet to demonstrate that it has set clear expectations and structures for ICT instruction in co-taught classrooms.

ORGANIZATIONAL CAPACITY

Lamad Academy's administrative structure is in transition with the recent loss of its assistant principal, school counselor, operations director, and business manager. As a result, its current administrative structure does not fully support the operational and academic needs of staff members and the school program, and there is currently no documented strategic plan describing how the school intends to bridge unresolved gaps in its current academic program, operations, and school culture. However, charter leaders have collectively identified short term priorities to improve organizational capacity, and have thus enlisted consultant services to support the hiring of a team to develop its operations systems and routines. Consultants also provide the school with cost-benefit analyses of its contracted third-party support services in information technology, finance, and human resources indicating that the school is receiving sufficient value from these services. However, Lamad Academy wishes to replace its student information system with a more robust application in the coming year.

In the past year, the school has released several mathematics teachers due to ineffective performance while cultivating high performing teachers in other content areas, one of whom has taken on an instructional coaching role. The school has an articulated behavior and discipline system for ensuring teachers apply multiple interventions prior to removing a student for behavior concerns. The school leadership team acknowledges teacher application of this system is inconsistent. Lamad Academy envisions a more robust restorative, student-led approach to discipline than is currently in place, including conflict resolution programs and peer court, which the school expects its current dean will initiate within the upcoming school year. The school has attributed its current year increase in out-of-school suspensions to, among other things, challenges with effective support from assigned paraprofessionals.

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A majority of teachers report having ample access to resources and facilities, and the school has plans to upgrade its science labs and arts programming in the near term. In addition, the school has secured a grant to fund the expansion of its mental health team. The school recognizes the need to expand its approaches for addressing student behavior.

The school has achieved full enrollment for this point in the school year, and it projects a higher number of applications for next year. However, despite maintaining full enrollment, the school has confronted steady student attrition, primarily in 6th grade, due to difficulties in securing transportation services for students living outside the immediate neighborhood with approximately 45% of 6th grade families withdrawing at the start of the 2022-23 school year. To maintain enrollment amidst these challenges, Lamad Academy has employed a multi-pronged approach that includes the use of mailers, recruitment from community-based organizations, and word of mouth. The school has also met its enrollment targets for special education students, and it has indicated a small increase in the enrollment of ELLs.

BOARD OVERSIGHT & GOVERNANCE

The Lamad Academy board consists of skilled, dedicated community members who have enacted structures to support the school's progress toward meeting academic and financial goals.

The board works closely with the Lamad Academy executive director and principal to review interim assessment performance trends and identify high leverage instructional priorities. The board also assists school leadership with securing third-party contracts for the provision of academic intervention services and operations support. To support the school as it builds a corps of skilled teachers and teacher leaders, the board assists in the screening of highly qualified candidates. As part of its long-term sustainability plan for student enrollment, the board conducts targeted outreach with community based organizations and potential feeder to schools in the district to strengthen its reputation as a school that welcomes students with difficult behavioral or academic track records. Lamad Academy currently has plans to expand its science, technology, engineering, and mathematics ("STEM") programming by increasing its fundraising and staff member recruitment efforts.

Board members cite self evaluation, pupil transportation, and fundraising as areas for growth, and they have also identified a need to diversify the board to include members with backgrounds in science education, business, community development, and public policy. The board conducts an annual evaluation of its executive director using performance metrics related to fundraising capacity, maintaining staffing stability, and holding the school principal accountable to improving student outcomes.

Lamad Academy

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APPENDICES

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OVERVIEW

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SUNY RENEWAL
BENCHMARKS

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APPENDIX A: CHARTER SCHOOL OVERVIEW

Ax [a]
CHARTER OVERVIEW

LAMAD ACADEMY CHARTER SCHOOL BOARD OF TRUSTEES[1]

CHAIR	TRUSTEES
Rubain J. Dorancy	Abenaa Frempong-Boadu
	Gregorio Mayers

TREASURER

Adrian Brijadder

SECRETARY

Kenneth J. Halperin

CHARTER LEADERS

PRINCIPAL

Frederick Underwood (2020-21 to Present)

EXECUTIVE DIRECTOR

Reverend Alfred L. Cockfield (2020-21 to Present)

CHARTER CHARACTERISTICS

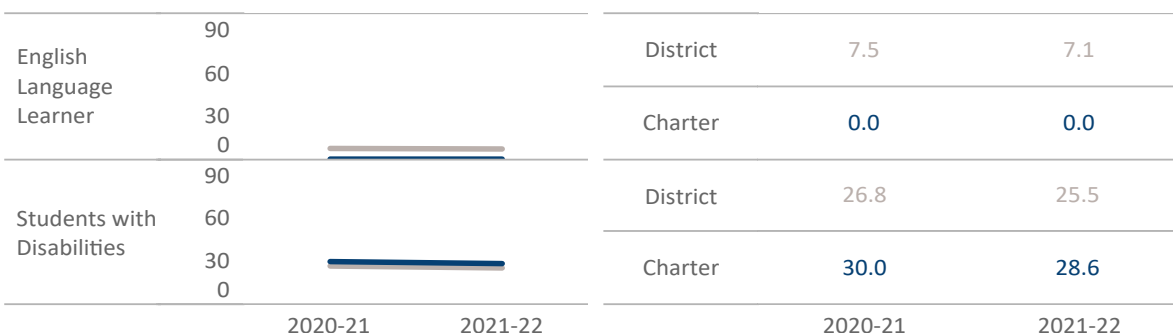| SCHOOL YEAR	CHARTERED ENROLLMENT	ACTUAL ENROLLMENT[2]	ACTUAL AS A PERCENTAGE OF CHARTERED ENROLLMENT	GRADES SERVED
2020-21	125	68	54%	6
2021-22	100	96	96%	6-7
2022-23	175	190	109%	6-8

1. *Source: The Institute's board records at the time of the visit.*

2. *Source: Institute's Official Enrollment Binder. (Figures may differ slightly from New York State Report Cards, depending on date of data collection.)*
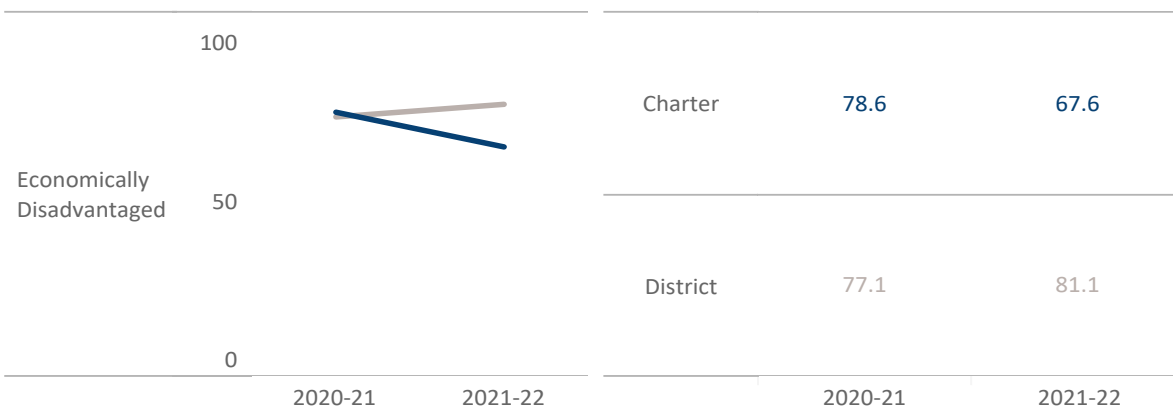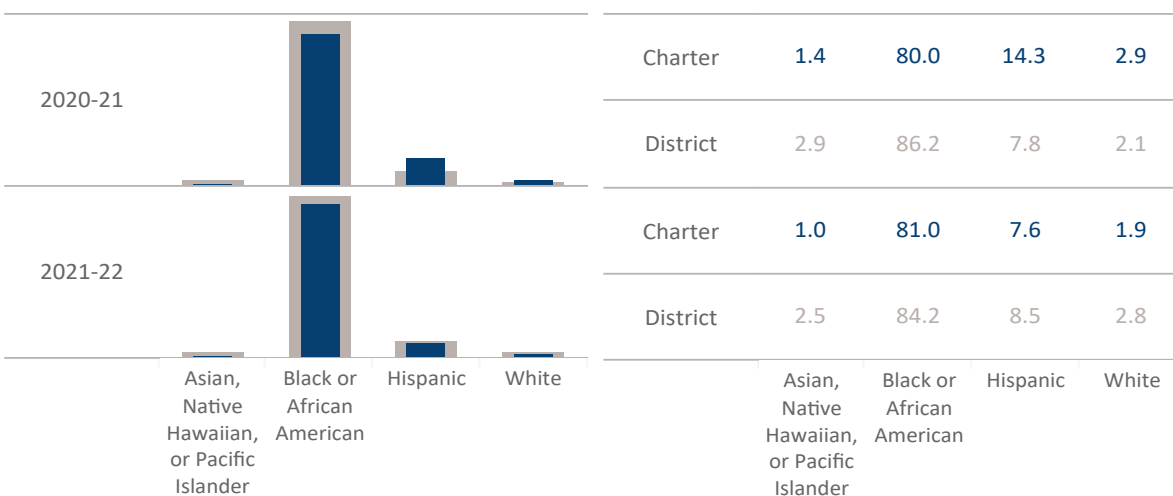
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APPENDIX A: CHARTER SCHOOL OVERVIEW

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CHARTER
OVERVIEW

Lamad Academy Charter School

Brooklyn CSD 18

Student Demographics: Special Populations

		District	7.5	7.1
English Language Learner		Charter	**0.0**	**0.0**
Students with Disabilities		District	26.8	25.5
		Charter	**30.0**	**28.6**
			2020-21	2021-22

Student Demographics: Free/Reduced Lunch

		Charter	78.6	67.6
Economically Disadvantaged		District	77.1	81.1
			2020-21	2021-22

Student Demographics: Race/Ethnicity

	Asian, Native Hawaiian, or Pacific Islander	Black or African American	Hispanic	White
Charter	**1.4**	**80.0**	**14.3**	**2.9**
District	2.9	86.2	7.8	2.1
Charter	**1.0**	**81.0**	**7.6**	**1.9**
District	2.5	84.2	8.5	2.8

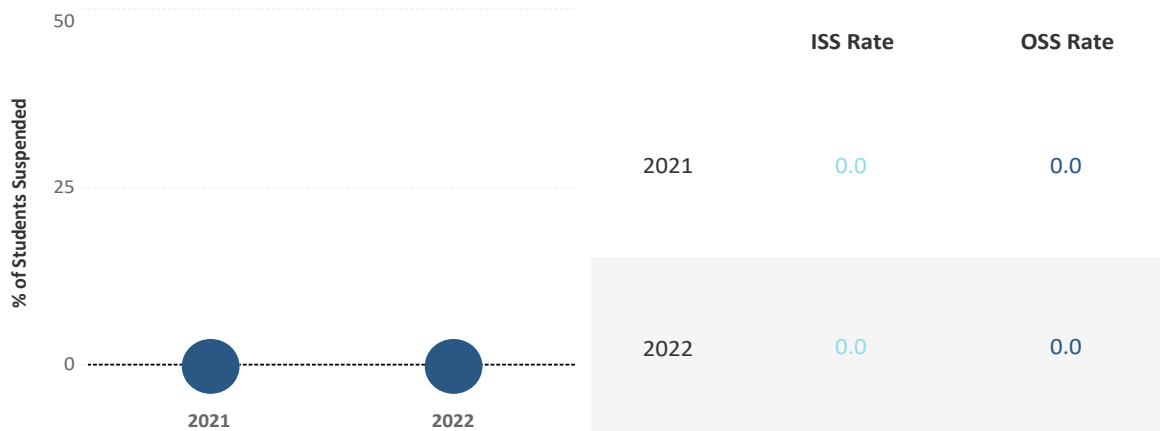** Data reported in these charts reflect BEDS day enrollment counts as reported by the NYSED except for the charter's 2020-21 ELL enrollment which reflects data reported by the education corporation and validated by the Institute.*

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APPENDIX A: CHARTER SCHOOL OVERVIEW

Ax[a]

CHARTER
OVERVIEW

Lamad Academy Charter School

Brooklyn CSD 18

% of Students Suspended

50

25

0

2021   2022

	ISS Rate	OSS Rate
2021	0.0	0.0
2022	0.0	0.0

Data suitable for comparison are not available. The percentage rate shown here is calculated using the method employed by NYCDOE: the total number of students receiving an in school or out of school suspension at any time during the school year is divided by the total enrollment, then multiplied by 100.

Persistence in Enrollment: The percentage of students eligible to return from previous year who did return

2021-22 .... 84.3

Expulsions: The number of students expelled from the charter each year

2021	2022
0	0

Lamad Academy Charter School's Enrollment and Retention Status: 2021-22

			Target	Charter
enrollment	economically disadvantaged		81.2	67.6
	English language learners		5.3	0.0
	students with disabilities		16.4	28.6
retention	economically disadvantaged		82.7	85.5
	English language learners		83.0	N/A
	students with disabilities		84.0	85.7

* Data reported in these charts reflect information reported by the education corporation and validated by the Institute.

APPENDIX A: CHARTER SCHOOL OVERVIEW

Ax a
CHARTER OVERVIEW

CHARTER SCHOOL VISIT HISTORY

SCHOOL YEAR	VISIT TYPE	DATE
2020-21	First Year Visit (Virtual)	May 25, 2021
2021-22	Evaluation Visit	April 6 – 7, 2022
2022-23	Evaluation Visit	March 14 – 15, 2023

CONDUCT OF THE VISIT

DATE(S) OF REVIEW	EVALUATION TEAM MEMBERS	TITLE
March 14 – 15, 2023	Ciani Jones	Senior Analyst
	Erin Allen	Senior Analyst
	Chris Dutkiewicz	School Finance Analyst
	Kathryn Connell-Espinosa	Interim Executive Director
	Jeff Wasbes	Executive Deputy Director for Accountability
	David Montes de Oca	External Consultant

CHARTER CYCLE CONTEXT

CHARTER TERM	ACCOUNTABILITY PERIOD	ANTICIPATED RENEWAL VISIT
Initial	Third Year of its Four-Year Accountability Period	Fall 2024

APPENDIX B: SUNY RENEWAL BENCHMARKS

Ax [b]

SUNY RENEWAL
BENCHMARKS

VERSION 5.0, MAY 2012

INTRODUCTION

The State University of New York Charter Renewal Benchmarks[1] (the "SUNY Renewal Benchmarks") serve two primary functions at renewal:

- They provide a framework for the Charter Schools Institute (the "Institute") to gather and evaluate evidence to determine whether a school has made an adequate case for renewal. In turn, this evidence assists the Institute in deciding if it can make the required legal and other findings in order to reach a positive recommendation for renewal. For example, the various benchmarks that the Institute uses to determine whether the school has had fiscally responsible practices in place during the last charter period allow the Institute to determine with greater precision whether the school will operate in a fiscally sound manner during the next charter period, a finding that the New York Charter Schools Act requires the SUNY Trustees to make.

- At the same time that the SUNY Renewal Benchmarks provide a framework for the Institute to collect and review evidence, they also provide the school with a guide to understanding the Institute's evaluative criteria. As the Institute uses the SUNY Renewal Benchmarks (or some sub-set of them) as the framework for conducting its ongoing school evaluation visits, school leaders should be fully aware of the content of the Benchmarks at the time of renewal.

The SUNY Renewal Benchmarks are organized into four inter-connected renewal questions that each school must answer when submitting a renewal application. The benchmarks further reflect the interwoven nature of schools from an academic, organizational, fiscal and/or legal perspective. For example, the Institute could reasonably place many of the academic benchmarks under the heading of organizational effectiveness. More generally, some redundancy exists because the Institute looks at the same issue from different perspectives.

Precisely how the Institute uses the SUNY Renewal Benchmarks, during both the renewal process and throughout the charter period, is explained in greater detail in the Practices, Policies and Procedures for the Renewal of Charter Schools Authorized by the State University of New York (the "SUNY Renewal Practices"), available on the Institute's website at: http://www.newyorkcharters.org/renewal/. Responses to frequently asked questions about the Institute's use of the SUNY Renewal Benchmarks appear below:

- The Institute does not have a point system for recommending renewal. A school cannot simply tally up the number of positive benchmark statements in order to determine the Institute's recommendation

  - Some benchmarks are weighed more heavily than others. In particular, the Institute gives the greatest weight to how well the school has met its academic Accountability Plan goals.

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1. Research on public school reform, known as the effective schools movement, has embraced the premise that, given certain organizing and cultural characteristics, schools can teach all children the intended curriculum and hold them to high academic standards. Over the decades, the accumulated research into effective schools has yielded a set of common characteristics that all effective schools share. These characteristics are so consistently prevalent among successful schools that they have come to be known as the Correlates of Effective Schools. The Renewal Benchmarks adapt and elaborate on these correlates.

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– Despite the fact that the Accountability Plan comprises only a single benchmark, a school's performance on that benchmark is critical. In fact, it is so important that while the Institute may recommend non-renewal for fiscal and organizational failures (if sufficiently serious), excellence in these areas will not excuse poor academic performance.

• The Institute does not use every benchmark during every kind of renewal review, and how the benchmarks are used differs depending on a school's circumstances. For example, the Qualitative Education Benchmarks (Benchmarks 1B-1F, 2C and 2D) are given far less weight in making a renewal decision on schools that the Institute has previously renewed. Similarly, less weight is accorded to these benchmarks during an initial renewal review where a school has consistently met its academic Accountability Plan goals.

– The Institute also may not consider every indicator subsumed under a benchmark when determining if a school has met that benchmark, given the school's stage of development or its previous track record.

• Aside from Benchmark 1A on academic Accountability Plan goals (which is singular in its importance), no school should fear that a failure to meet every element of every benchmark means that it is not in a position to make a case for renewal. To the contrary, the Institute has yet to see a school that performs perfectly in every respect. The Institute appreciates that the benchmarks set a very high standard collectively. While the Institute certainly hopes and expects that schools aim high, it is understood that a school's reach will necessarily exceed its grasp in at least some aspects.

In this fifth edition of the SUNY Renewal Benchmarks, the Institute has made some revisions to the Qualitative Educational Benchmarks, namely those benchmarks used for ongoing school evaluation visits, to streamline the collection of evidence. For example, the Institute has incorporated Student Order and Discipline into Pedagogy, and Professional Development into Instructional Leadership. The Institute has rewritten some of the overarching benchmark statements to capture the most salient aspects of school effectiveness, organizational viability, legal compliance, and fiscal soundness. Some of the bulleted indicators within benchmarks have been recast or eliminated. Finally, the Institute has added some indicators to align the benchmarks with changes in the Charter Schools Act (e.g., provisions in meeting enrollment and retention targets when assigned and abiding by the General Municipal Law).

It is important that the entire school community understand the renewal process. All members of a school's leadership team and board should carefully review both the SUNY Renewal Benchmarks and the SUNY Renewal Practices. Note that a renewal overview document for parents, teacher and community members is also available on the Institute's website at: http://www.newyorkcharters.org/renewal/. Please do not hesitate to contact the Institute with any questions.

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RENEWAL QUESTION 1
IS THE SCHOOL AN ACADEMIC SUCCESS?

1A – ACADEMIC ACCOUNTABILITY PLAN GOALS

OVER THE ACCOUNTABILITY PERIOD, THE SCHOOL HAS MET OR COME CLOSE TO MEETING ITS ACADEMIC ACCOUNTABILITY PLAN GOALS.

The Institute determines the extent to which the school has met the Accountability Plan goals in the following areas:

- English language arts;
- mathematics;
- science;
- social studies (high school only);
- NCLB;
- high school graduation and college preparation (if applicable); and
- optional academic goals included by the school.

1B – USE OF ASSESSMENT DATA

THE SCHOOL HAS AN ASSESSMENT SYSTEM THAT IMPROVES INSTRUCTIONAL EFFECTIVENESS AND STUDENT LEARNING.

The following elements are generally present:

- the school regularly administers valid and reliable assessments aligned to the school's curriculum and state performance standards;
- the school has a valid and reliable process for scoring and analyzing assessments;
- the school makes assessment data accessible to teachers, school leaders and board members;
- teachers use assessment results to meet students' needs by adjusting classroom instruction, grouping students and/or identifying students for special intervention;
- school leaders use assessment results to evaluate teacher effectiveness and to develop professional development and coaching strategies; and
- the school regularly communicates to parents/guardians about their students' progress and growth.

1C – CURRICULUM

THE SCHOOL'S CURRICULUM SUPPORTS TEACHERS IN THEIR INSTRUCTIONAL PLANNING.

The following elements are generally present:

- the school has a curriculum framework with student performance expectations that provides a fixed, underlying structure, aligned to state standards and across grades;

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- in addition to the framework, the school has supporting tools (i.e., curriculum maps or scope and sequence documents) that provide a bridge between the curriculum framework and lesson plans;

- teachers know what to teach and when to teach it based on these documents;

- the school has a process for selecting, developing and reviewing its curriculum documents and its resources for delivering the curriculum; and

- teachers plan purposeful and focused lessons.

1D – PEDAGOGY

HIGH QUALITY INSTRUCTION IS EVIDENT THROUGHOUT THE SCHOOL.
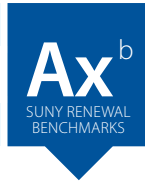
The following elements are generally present:

- teachers deliver purposeful lessons with clear objectives aligned to the school's curriculum;

- teachers regularly and effectively use techniques to check for student understanding;

- teachers include opportunities in their lessons to challenge students with questions and activities that develop depth of understanding and higher-order thinking and problem solving skills;

- teachers maximize learning time (e.g., appropriate pacing, on-task student behavior, clear lesson focus and clear directions to students); transitions are efficient; and

- teachers have effective classroom management techniques and routines that create a consistent focus on academic achievement.

1E – INSTRUCTIONAL LEADERSHIP

THE SCHOOL HAS STRONG INSTRUCTIONAL LEADERSHIP.

The following elements are generally present:

- the school's leadership establishes an environment of high expectations for teacher performance (in content knowledge and pedagogical skills) and in which teachers believe that all students can succeed;

- the instructional leadership is adequate to support the development of the teaching staff;

- instructional leaders provide sustained, systemic and effective coaching and supervision that improves teachers' instructional effectiveness;

- instructional leaders provide opportunities and guidance for teachers to plan curriculum and instruction within and across grade levels;

- instructional leaders implement a comprehensive professional development program that develops the competencies and skills of all teachers;

- professional development activities are interrelated with classroom practice;

- instructional leaders regularly conduct teacher evaluations with clear criteria that accurately identify teachers' strengths and weaknesses; and

- instructional leaders hold teachers accountable for quality instruction and student achievement.

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1F – AT-RISK STUDENTS

THE SCHOOL MEETS THE EDUCATIONAL NEEDS OF AT-RISK STUDENTS.

The following elements are generally present:

- the school uses clear procedures for identifying at-risk students including students with disabilities, English language learners and those struggling academically;

- the school has adequate intervention programs to meet the needs of at-risk students;

- general education teachers, as well as specialists, utilize effective strategies to support students within the general education program;

- the school adequately monitors the progress and success of at-risk students;

- teachers are aware of their students' progress toward meeting IEP goals, achieving English proficiency or school-based goals for struggling students;

- the school provides adequate training and professional development to identify at-risk students and to help teachers meet students' needs; and

- the school provides opportunities for coordination between classroom teachers and at-risk program staff including the school nurse, if applicable.

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RENEWAL QUESTION 2

IS THE SCHOOL AN EFFECTIVE, VIABLE ORGANIZATION?

2A – MISSION & KEY DESIGN ELEMENTS

THE SCHOOL IS FAITHFUL TO ITS MISSION AND HAS IMPLEMENTED THE KEY DESIGN ELEMENTS INCLUDED IN ITS CHARTER.

The following elements are generally present:

- the school faithfully follows its mission; and

- the school has implemented its key design elements.

2B – PARENTS & STUDENTS

PARENTS/GUARDIANS AND STUDENTS ARE SATISFIED WITH THE SCHOOL.

The following elements are generally present:

- the school regularly communicates each child's academic performance results to families;
- families are satisfied with the school; and
- parents keep their children enrolled year-to-year.

2C – ORGANIZATIONAL CAPACITY

THE SCHOOL ORGANIZATION EFFECTIVELY SUPPORTS THE DELIVERY OF THE EDUCATIONAL PROGRAM.

The following elements are generally present:

- the school has established an administrative structure with staff, operational systems, policies and procedures that allow the school to carry out its academic program;
- the organizational structure establishes distinct lines of accountability with clearly defined roles and responsibilities;
- the school has a clear student discipline system in place at the administrative level that is consistently applied;
- the school retains quality staff;
- the school has allocated sufficient resources to support the achievement of goals;
- the school maintains adequate student enrollment;
- the school has procedures in place to monitor its progress toward meeting enrollment and retention targets for special education students, ELLs and students who qualify for free and reduced price lunch, and adjusts its recruitment efforts accordingly; and

- the school regularly monitors and evaluates the school's programs and makes changes if necessary.

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2D – BOARD OVERSIGHT

THE SCHOOL BOARD WORKS EFFECTIVELY TO ACHIEVE THE SCHOOL'S ACCOUNTABILITY PLAN GOALS.

The following elements are generally present:

- board members possess adequate skills and have put in place structures and procedures with which to govern the school and oversee management of day-to-day operations in order to ensure the school's future as an academically successful, financially healthy and legally compliant organization;

- the board requests and receives sufficient information to provide rigorous oversight of the school's program and finances;

- it establishes clear priorities, objectives and long-range goals, (including Accountability Plan, fiscal, facilities and fundraising), and has in place benchmarks for tracking progress as well as a process for their regular review and revision;

- the board successfully recruits, hires and retains key personnel, and provides them with sufficient resources to function effectively;

- the board regularly evaluates its own performance and that of the school leaders and the management company (if applicable), holding them accountable for student achievement; and

- the board effectively communicates with the school community including school leadership, staff, parents/ guardians and students.

2E – GOVERNANCE

THE BOARD IMPLEMENTS, MAINTAINS AND ABIDES BY APPROPRIATE POLICIES, SYSTEMS AND PROCESSES.

The following elements are generally present:

- the board effectively communicates with its partner or management organizations as well as key contractors such as back-office service providers and ensures that it receives value in exchange for contracts and relationships it enters into and effectively monitors such relationships;

- the board takes effective action when there are organizational, leadership, management, facilities or fiscal deficiencies; or where the management or partner organization fails to meet expectations; to correct those deficiencies and puts in place benchmarks for determining if the partner organization corrects them in a timely fashion;

- the board regularly reviews and updates board and school policies as needed and has in place an orientation process for new members;

- the board effectively recruits and selects new members in order to maintain adequate skill sets and expertise for effective governance and structural continuity;

- the board implements a comprehensive and strict conflict of interest policy (and/or code of ethics)—consistent with that set forth in the charter and with the General Municipal Law—and consistently abides by them throughout the term of the charter;

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- the board generally avoids conflicts of interest; where not possible, the board manages those conflicts in a clear and transparent manner;
- the board implements a process for dealing with complaints consistent with that set forth in the charter, makes the complaint policy clear to all stakeholders, and follows the policy including acting on complaints in a timely fashion;
- the board abides by its by-laws including, but not limited to, provisions regarding trustee election and the removal and filling of vacancies; and
- the board holds all meetings in accordance with the Open Meetings Law and records minutes for all meetings including executive sessions and, as appropriate, committee meetings.

2F – LEGAL REQUIREMENTS

THE SCHOOL SUBSTANTIALLY COMPLIES WITH APPLICABLE LAWS, RULES AND REGULATIONS AND THE PROVISIONS OF ITS CHARTER.

The following elements are generally present:

- the school compiles a record of substantial compliance with the terms of its charter and applicable state and federal laws, rules and regulations including, but not limited to, submitting items to the Institute in a timely manner, and meeting teacher certification (including NCLB highly qualified status) and background check requirements, FOIL and Open Meetings Law;
- the school substantially complies with the terms of its charter and applicable laws, rules and regulations;
- the school abides by the terms of its monitoring plan;
- the school implements effective systems and controls to ensure that it meets legal and charter requirements;
- the school has an active and ongoing relationship with in-house or independent legal counsel who reviews and makes recommendations on relevant policies, documents, transactions and incidents and who also handles other legal matters as needed; and
- the school manages any litigation appropriately and provides litigation papers to insurers and the Institute in a timely manner.

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RENEWAL QUESTION 3
IS THE SCHOOL FISCALLY SOUND?

3A – BUDGETING AND LONG RANGE PLANNING

THE SCHOOL OPERATES PURSUANT TO A LONG-RANGE FINANCIAL PLAN IN WHICH IT CREATES REALISTIC BUDGETS THAT IT MONITORS AND ADJUSTS WHEN APPROPRIATE.

The following elements are generally present:

- the school has clear budgetary objectives and budget preparation procedures;

- board members, school management and staff contribute to the budget process, as appropriate;

- the school frequently compares its long-range fiscal plan to actual progress and adjusts it to meet changing conditions;

- the school routinely analyzes budget variances; the board addresses material variances and makes necessary revisions; and

- actual expenses are equal to, or less than, actual revenue with no material exceptions.

3B – INTERNAL CONTROLS

THE SCHOOL MAINTAINS APPROPRIATE INTERNAL CONTROLS AND PROCEDURES.

The following elements are generally present:

- the school follows a set of comprehensive written fiscal policies and procedures;

- the school accurately records and appropriately documents transactions in accordance with management's direction, laws, regulations, grants and contracts;

- the school safeguards its assets;

- the school identifies/analyzes risks and takes mitigating actions;

- the school has controls in place to ensure that management decisions are properly carried out and monitors and assesses controls to ensure their adequacy;

- the school's trustees and employees adhere to a code of ethics;

- the school ensures duties are appropriately segregated, or institutes compensating controls;

- the school ensures that employees performing financial functions are appropriately qualified and adequately trained;

- the school has systems in place to provide the appropriate information needed by staff and the board to make sound financial decisions and to fulfill compliance requirements;

- a staff member of the school reviews grant agreements and restrictive gifts and monitors compliance with all stated conditions;

- the school prepares payroll according to appropriate state and federal regulations and school policy;

- the school ensures that employees, trustees and volunteers who handle cash and investments are bonded to help assure the safeguarding of assets; and

- the school takes corrective action in a timely manner to address any internal control or compliance deficiencies identified by its external auditor, the Institute, and/or the State Education Department or the Comptroller, if needed.

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3C – FINANCIAL REPORTING

THE SCHOOL HAS COMPLIED WITH FINANCIAL REPORTING REQUIREMENTS BY PROVIDING THE SUNY TRUSTEES AND THE STATE EDUCATION DEPARTMENT WITH REQUIRED FINANCIAL REPORTS THAT ARE ON TIME, COMPLETE AND FOLLOW GENERALLY ACCEPTED ACCOUNTING PRINCIPLES.

The following reports have generally been filed in a timely, accurate and complete manner:

- annual financial statement audit reports including federal Single Audit report, if applicable;
- annual budgets and cash flow statements;
- un-audited quarterly reports of income, expenses, and enrollment;
- bi-monthly enrollment reports to the district and, if applicable, to the State Education Department including proper documentation regarding the level of special education services provided to students; and
- grant expenditure reports.

3D – FINANCIAL CONDITION

THE SCHOOL MAINTAINS ADEQUATE FINANCIAL RESOURCES TO ENSURE STABLE OPERATIONS. CRITICAL FINANCIAL NEEDS OF THE SCHOOL ARE NOT DEPENDENT ON VARIABLE INCOME (GRANTS, DONATIONS AND FUNDRAISING).

The following elements are generally present:

- the school maintains sufficient cash on hand to pay current bills and those that are due shortly;
- the school maintains adequate liquid reserves to fund expenses in the event of income loss (generally three months);
- the school prepares and monitors cash flow projections;
- If the school includes philanthropy in its budget, it monitors progress toward its development goals on a periodic basis;
- If necessary, the school pursues district state aid intercepts with the state education department to ensure adequate per pupil funding; and
- the school accumulates unrestricted net assets that are equal to or exceed two percent of the school's operating budget for the upcoming year.

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RENEWAL QUESTION 4

IF THE SCHOOL'S CHARTER IS RENEWED, WHAT ARE ITS PLANS FOR THE TERM OF THE NEXT CHARTER PERIOD, AND ARE THEY REASONABLE, FEASIBLE AND ACHIEVABLE?

4A – PLANS FOR THE SCHOOL'S STRUCTURE

KEY STRUCTURAL ELEMENTS OF THE SCHOOL, AS DEFINED IN THE EXHIBITS OF THE APPLICATION FOR CHARTER RENEWAL, ARE REASONABLE, FEASIBLE AND ACHIEVABLE.

Based on elements present in the Application for Charter Renewal:

- the school is likely to fulfill its mission in the next charter period;
- the school has an enrollment plan that can support the school program;
- the school calendar and daily schedules clearly provide sufficient instructional time to meet all legal requirements, allow the school to meet its proposed Accountability Plan goals and abide by its proposed budget;
- key design elements are consistent with the mission statement and are feasible given the school's budget and staffing;
- a curriculum framework for added grades aligns with the state's performance standards; and
- plans in the other required Exhibits indicate that the school's structure is likely to support the educational program.

4B – PLANS FOR THE EDUCATIONAL PROGRAM

THE SCHOOL'S PLANS FOR IMPLEMENTING THE EDUCATIONAL PROGRAM ALLOW IT TO MEET ITS ACCOUNTABILITY PLAN GOALS.

Based on elements present in the Application for Charter Renewal:

- for those grades served during the last charter period, the school has plans for sustaining and (where possible) improving upon the student outcomes it has compiled during the last charter period including any adjustments or additions to the school's educational program;
- for a school that is seeking to add grades, the school is likely to meet its Accountability Plan goals and the SUNY Renewal Benchmarks at the new grade levels; and
- where the school will provide secondary school instruction, it has presented a set of requirements for graduation that students are likely to meet and that are consistent with the graduation standards set by the Board of Regents.

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4C – PLANS FOR BOARD OVERSIGHT AND GOVERNANCE

THE SCHOOL PROVIDES A REASONABLE, FEASIBLE AND ACHIEVABLE PLAN FOR BOARD OVERSIGHT AND GOVERNANCE.

Based on elements present in the Application for Charter Renewal:

- school trustees are likely to possess a range of experience, skills, and abilities sufficient to oversee the academic, organizational and fiscal performance of the school;

- plans by the school board to orient new trustees to their roles and responsibilities, and, if appropriate, to participate in ongoing board training are likely to sustain the board's ability to carry out its responsibilities;

- if the school plans to change an association with a partner or management organization in the term of a future charter, it has provided a clear rationale for the disassociation and an outline indicating how it will manage the functions previously associated with that partnering organization; and

- if the school is either moving from self-management to a management structure or vice-versa, or is changing its charter management organization/educational service provider, its plans indicate that it will be managed in an effective, sound and viable manner including appropriate oversight of the academic and fiscal performance of the school or the management organization.

4D – FISCAL & FACILITY PLANS

THE SCHOOL PROVIDES A REASONABLE, FEASIBLE AND ACHIEVABLE FISCAL PLAN INCLUDING PLANS FOR AN ADEQUATE FACILITY.

Based on the elements present in the Application for Charter Renewal:

- the school's budgets adequately support staffing, enrollment and facility projections;

- fiscal plans are based on the sound use of financial resources to support academic program needs;

- fiscal plans are clear, accurate, complete and based on reasonable assumptions;

- information on enrollment demand provides clear evidence for the reasonableness of projected enrollment; and

- facility plans are likely to meet educational program needs.