

University Preparatory Charter School for Young Men

School Evaluation Report 2011-2012

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Report Issued: March 6, 2012

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INTRODUCTION

This School Evaluation Report includes three components. The first section, titled School Overview, provides descriptive information about the school, including enrollment and demographic data, as well as historical information regarding the life of the school. The second section provides background information on the conduct of the evaluation visit, including the date of the visit and information about the evaluation team, and puts the visit in the context of the school's current charter cycle. Finally, in a third section entitled School Evaluation Visit, the report presents overall benchmark conclusions (in italics) and an analysis of evidence collected for each of the respective benchmarks.

The Qualitative Educational Benchmarks (a component of the Renewal Benchmarks) address the academic success of the school, focusing on teaching and learning (i.e., curriculum, instruction, and assessment), and the effectiveness and viability of the school organization, including board oversight and organizational capacity. The Institute uses the established criteria on a regular and ongoing basis to provide schools with a consistent set of expectations leading up to renewal.

The report below provides more detailed conclusions, and evidence to support these conclusions, for some benchmarks in order to highlight areas of concern and provide additional feedback. In contrast to the format of reports issued in previous years and in an effort to issue reports in a timelier manner, the Institute now approaches the presentation as an <u>exception report</u> and deliberately emphasizes areas of concern. As such, limited detail and evidence about positive aspects of the program are not an indication that the Institute does not fully recognize evidence of program effectiveness.

Because of the inherent complexity of a school organization, this School Evaluation Report does not contain a single rating or comprehensive indicator that would specify at a glance the school's prospects for renewal. However, it does summarize the various strengths of the school and note areas in need of improvement based on the Qualitative Educational Benchmarks.

SCHOOL OVERVIEW

Opening Information

Date Initial Charter Approved by SUNY Trustees	June 22, 2004
Date Initial Charter Approved by Operation of Law	December 4, 2004
School Opening Date	September, 2010

Location

School Year(s)	Location(s)	Grades	District
2010-11 to	100 D-1 D-1- D-1 NV	A 1:	Rochester City School
Present	180 Raines Park Rochester, NY	All	District

Current Mission Statement

The mission of University Preparatory Charter School for Young Men is to establish a single-sex education option in the City of Rochester with an engaging learning environment and informed practices that are effective for young men. The school will be available to all city residents who choose to have their children educated in a single-sex education environment, regardless of their ability to meet high tuition costs.

Current Key Design Elements

Single-sex education;	
individualized learning;	
substantive content;	
daily advisory; and	
 continuous relationship building. 	

School Characteristics

School Year	Original Chartered Enrollment	Actual Enrollment ¹	Original Chartered Grades	Actual Grades	Days of Instruction
2010-11	150	157	7-8	5-8	185
2011-12	225	-	7-9	7-9	185

¹ Source: SUNY Charter School Institute's Official Enrollment Binder. (Figures may differ slightly from New York State Report Cards, depending on date of data collection.)

Current Board of Trustees²

Vince Carfagna	Treasurer	
Melissa Piccarreto	Trustee	
Dr. Michael Robinson	Board President/Executive Committee	
Maria Scalise	Secretary/Executive Committee	
Sam Valleriani	Trustee	
Jose M. Vazquez Jr.	Vice President of Policy and Bylaws/Executive Committee	
Dr. Marie Cianca	Trustee/Accountability Committee	
Hussain Ahmed	Trustee	
Jackie Campbell	Trustee	

School Leader(s)

School Year	School Leader(s) Name and Title
2010-11 to Present	Joseph Munno, Principal

School Visit History

School Year	Visit Type Evaluator		Date
		(Institute/External)	***************************************
2010-11	First Year	Institute	February 3, 2011
2011-12	Second Year	Institute	October 13, 2011

² Source: Institute board information.

CONDUCT OF VISIT

Specifications

Evaluation Team Members	Title
Dr. Paul Wright	Director of School Evaluation
Sean Fitzsimons	Program Analyst
Lori Clement	Senior Analyst
Adam Aberman	External Consultant
	Dr. Paul Wright Sean Fitzsimons Lori Clement

Context of the Visit

Charter Cycle	Evaluation Team Members
Charter Period	2 nd Year of First Charter Term ³
Accountability Period	2 nd Year of Four-Year Accountability Period
Impending Renewal Visit	Fall 2014

³ Because the Institute makes a renewal decision in the last year of a Charter Period, the Accountability Period ends in the next to last year of the Charter Period. For initial renewals, the Accountability Period is the first four years of the Charter Period. For subsequent renewals, the Accountability Period includes the last year of the previous Charter Period through the next to last year of the current Charter Period.

SCHOOL EVALUATION VISIT

Benchmark Conclusions and Evidence

1. B Use of Assessment Data

University Preparatory Charter School for Young Men ("University Prep") has an emerging assessment program and uses it to improve student learning.

The school administers a norm-referenced diagnostic assessment and Scholastic Reading, literacy and math inventories in order to group students by ability level in the classroom. The school uses the previous year's New York State assessment results to target students for remediation and enrichment classes, as well as to determine which students would attend summer school and which students would take Spanish courses. The school administration also uses the assessment results to make changes to the academic program. As a result of lower than expected results last spring, the school has added remedial math and English language arts lab classes for almost all students.

In addition to standardized tests, teachers use a combination of commercial and teacher-made assessments with limited oversight, in order to ensure alignment to the school's curriculum and state standards. Teachers discuss data derived from these assessments during professional development and common planning time and use it to inform lesson planning and instruction. The school has convened a curriculum committee to analyze old state tests and create interim assessments aligned to the state testing program in order to measure progress and identify students for remediation during the school year. At the time of the visit, the committee had not yet generated any assessments through this process; therefore, the effectiveness of the committee cannot be determined.

1. C Curriculum

University Prep has a comprehensive curriculum that generally supports teachers in planning relevant learning activities.

During the summer, teachers in core academic subject areas create curriculum maps based on the school's commercial curriculum, school developed objectives and essential questions, as well as the New York State standards. These maps detail the knowledge and skills that all students are expected to master over the course of the school year. The school's instructional leaders ensure that lesson maps include all necessary components, including clear objectives and essential questions, and that they generally align to state standards.

University Prep has not formally reviewed its commercial curriculum, nor have leaders checked to ensure that curriculum maps directly align to the state standards. Additionally, the school does not provide sufficient, structured opportunities to review and revise curriculum maps throughout the year. Teachers have ample common planning time throughout the week to develop interdisciplinary units and lessons and to adjust the pacing contained in the school's commercial curriculum. The school uses a well-developed common lesson-planning template; instructional leaders regularly review lesson plans.

1. D Pedagogy

Adequate instruction is evident in a limited number of classes throughout the school.

Teachers follow well-defined lesson plans with objectives aligned to the school's curriculum; however, in many classes, lesson implementation does not effectively support the learning of these objectives. While most students are quiet, respectful and at least minimally engaged in lessons, in many observed classes a large minority of students is not engaged. For example, some students have heads on their desks, some are not completing assigned activities and some engage in side conversations during lessons. Some teachers use effective classroom management techniques to address off-task behavior, such as moving within close proximity of misbehaving students. However, many teachers simply raise their voices or repeatedly call on misbehaving students without further consequences. Not all teachers hold students accountable for learning. For example, many teachers give students "bridge" activities, such as completing math review problems, at the beginning of class to focus them on the coming lesson; nevertheless, most students do not complete the tasks before teachers proceed to other activities. In many classes, teachers only call on a small number of students or those who raise their hands during lessons.

1. E Instructional Leadership

University Prep has strengthened the instructional leadership team which, with additional time to develop, may prove to be effective.

The school's instructional leadership structure is adequate to support the development of the teaching staff. The school's assistant principal supports English language arts and social studies teachers, while the director of instruction supports mathematics, science and other teachers. Both instructional leaders regularly monitor classes, often observing each class once a day, and assist teachers with lesson planning during common prep periods. During or immediately following observed lessons, instructional leaders provide teachers with both verbal and written feedback. Additionally, instructional leaders collect lesson plans on a weekly basis and provide written guidance and suggestions to teachers. Math and literacy specialists also support teachers by pushing into classes to observe, offering suggestions and planning with teachers. The instructional leaders formally evaluate teachers twice per year, however not all teachers are aware of the evaluation criteria. Informal observations occur at least an additional three times per year, with leaders videotaping and analyzing the observations.

1. F At-Risk Students

University Prep has procedures and resources to meet the needs of students with special needs, but has not fully implemented a system to serve students at-risk of academic failure.

The school follows a clear multi-step system to identify students for special education services. Teachers refer students to instructional leaders who offer suggested strategies for working with individual students. Following this procedure, an Academic Intervention Services team suggests increased remedial class time and, if necessary, referral to the Committee on Special Education. The school provides robust staffing and sufficient settings to meet the needs of special education students, including three full-time special educators who push into classrooms, a district-provided special educator who provides a resource room setting and district-provided speech and occupational therapists. Teachers are aware of student progress

toward meeting IEP goals and the school provides opportunities for them to coordinate with at-risk staff during common grade level planning.

The school is developing systems to identify and monitor the progress of at-risk students, but with the exception of summer school, it currently provides little differentiated, targeted assistance based on individual student needs. Almost all students take remedial math and English language arts lab classes during their core academic day and supplemental remediation during extended learning. At the time of the visit, the school was in the process of developing more targeted interventions to meet the individual needs of struggling students.

The school follows the standard process for identifying and monitoring the progress of English language learners (ELLs), which includes the administration of the Lab-R and NYSESLAT. The school employs a part-time English as a second language teacher who provides pull-out instruction to ELLs using an ELL-specific curriculum.

1. G Student Order and Discipline

University Prep has established a safe environment for its students; however, the school has not yet established a culture of scholarship. Behavioral issues continue to detract from learning.

Hallways are safe and well monitored by staff members. Transitions between classes are generally orderly. There is a documented discipline policy and common expectations about how to apply this policy; however, some teachers do not implement it consistently and struggle with classroom management despite having received professional development from school leaders. For example, some teachers allow students to talk back with no repercussions, while others give students warnings that lead to referrals. The school employs two full-time "house coordinators" to handle disciplinary issues and regularly communicate student needs to staff members. They are responsible for building relationships with students and "refocusing" those who have been referred to them for disciplinary infractions in an effort to quickly return them to classrooms. The school emphasizes keeping students in their classrooms as much as possible by requiring teachers to warn students multiple times before reaching out to house coordinators.

1. H Professional Development

University Prep's professional development program generally assists teachers in meeting student academic needs and school goals.

The school provides sufficient time for professional development, including a two-week summer institute, weekly professional development and external opportunities for teachers to attend conferences. The content of the school's professional development program dovetails with the school's mission, curriculum and instructional programs, especially in relation to the Expeditionary Learning program. Expeditionary Learning has provided much of the training and professional development to staff in the past; however, at the time of the visit, Expeditionary Learning and the school had ceased working together. It is unclear how this will influence the school's professional development program moving forward. The school's instructional leaders also periodically lead professional development sessions. Past topics include training teachers to implement the school's programs (e.g. Read 180), cross-curricular curriculum planning and analyzing assessment data.

2. C Organizational Capacity

University Prep has generally sufficient organizational capacity to support the delivery of the educational program.

The school has established an administrative structure with staff, operational systems and procedures that allow the school to carry out its academic program. University Prep's organizational structure establishes distinct lines of accountability with generally clear roles and responsibilities, although not all staff members can articulate the difference between the roles of the school's director of instruction and assistant principal. The school has recently added the assistant principal position, which along with the director of instruction provides an increased emphasis on instruction and ensures that teachers receive higher levels of professional development and support than they had in the school's first year. This addition is largely in response to the limited instructional leadership in the school's first year. The school's leadership now regularly monitors and evaluates the school's programs and makes changes as necessary. For example, the school has added remedial math and literacy labs in response to low state assessment scores. The school maintains adequate enrollment and attendance levels.

School leaders, recognize the gravity of low performance on high stakes exams and have, thus, begun to allocate sufficient resources and staff to support the achievement of educational goals. While school leaders have implemented promising changes in the organizational structure and academic program that have the potential to drive student achievement with more time, it remains to be seen whether school leaders, teachers and staff will fully implement these changes with sufficient success to push the school toward meeting its accountability plan goals.

2. D Board Oversight

The school board has provided generally effective oversight to most facets of the educational program.

Board members have adequate skills to provide rigorous oversight of the school, including members with experience in secondary education, finance and law. However, the board has lost some members in the transition from pre-opening to full operation and is seeking to recruit members who can support this work. Regardless of this concern, board members understand the core business of the school, student achievement, which drives how they approach their governance responsibilities. For example, the board, in consultation with the school's leaders, has created an action plan with concrete benchmarks to address academic deficiencies.

The board has not yet evaluated the school leader, but has begun to design criteria for determining his level of performance. While the board monitors the school through the school leaders' dashboard of academic and fiscal information, the school leaders did not fully apprise the board of at least one major issue. At the time of the visit, the board received notice from Expeditionary Learning that it was terminating its affiliation with the school. Board members had been aware of challenges in the relationship between the school's leaders and Expeditionary Learning, and the board had worked with the school's leaders to address these challenges by including this topic in the board created action plan for the school. However, board members report that the termination was unexpected.

APPENDIX A: RENEWAL BENCHMARKS USED DURING THE VISIT

An excerpt of the State University Charter Renewal Benchmarks follows.

Visit the Institute's website at: http://www.newyorkcharters.org/

documents/renewalBenchmarks.doc to see the complete listing of Benchmarks.

Benchmarks 1B – 1H, and Benchmarks 2A – 2E were using in conducting this evaluation visit.

	Renewal Question 1 Is the School an Academic Success?		
Evidence Category	State University Renewal Benchmarks		
State University Renewal Benchmark 1B	The school has a system to gather assessment and evaluation data and uses it to improve instructional effectiveness and student learning.		
Use of Assessment Data	Elements that are generally present include:		
	 the school regularly uses standardized and other assessments that are aligned to the school's curriculum framework and state performance standards; the school systematically collects and analyzes data from diagnostic, formative, and summative assessments, and makes it accessible to teachers, school leaders 		
	 and the school board; the school uses protocols, procedures and rubrics that ensure that the scoring of assessments and evaluation of student work is reliable and trustworthy; the school uses assessment data to predict whether the school's Accountability Plan goals are being achieved; 		
	the school's leaders use assessment data to monitor, change and improve the school's academic program, including curriculum and instruction, professional development, staffing and intervention services;		
	the school's teachers use assessment data to adjust and improve instruction to meet the identified needs of students;		
	 a common understanding exists between and among teachers and administrator of the meaning and consequences of assessment results, e.g., changes to the instructional program, access to remediation, promotion to the next grade; 		
	 the school regularly communicates each student's progress and growth to his or her parents/guardians; and 		
	the school regularly communicates to the school community overall academic performance as well as the school's progress toward meeting its academic Accountability Plan goals.		
State University	The school has a clearly defined curriculum and uses it to prepare students to		

Renewal meet state performance standards. Benchmark 1C Elements that are generally present include: Curriculum the school has a well-defined curriculum framework for each grade and core academic subject, which includes the knowledge and skills that all students are expected to achieve as specified by New York State standards and performance indicators: the school has carefully analyzed all curriculum resources (including commercial materials) currently in use in relation to the school's curriculum framework, identified areas of deficiency and/or misalignment, and addressed them in the instructional program; the curriculum as implemented is organized, cohesive, and aligned from grade to teachers are fully aware of the curricula that they are responsible to teach and have access to curricular documents such as scope and sequence documents, pacing charts, and/or curriculum maps that guide the development of their lesson plans; teachers develop and use lesson plans with objectives that are in alignment with the school's curriculum; the school has defined a procedure, allocated time and resources, and included teachers in ongoing review and revision of the curriculum; and the curriculum supports the school's stated mission. **State University** High quality instruction is evident in all classes throughout the school. Renewal Benchmark 1D Elements that are generally present include: teachers demonstrate subject-matter and grade-level competency in the subjects Pedagogy and grades they teach; instruction is rigorous and focused on learning objectives that specify clear expectations for what students must know and be able to do in each lesson; lesson plans and instruction are aligned to the school's curriculum framework and New York State standards and performance indicators: instruction is differentiated to meet the range of learning needs represented in the school's student population, e.g. flexible student grouping, differentiated materials, pedagogical techniques, and/or assessments; all students are cognitively engaged in focused, purposeful learning activities during instructional time; learning time is maximized (e.g., appropriate pacing, high on-task student behavior, clear lesson focus and clear directions to students), transitions are efficient, and there is day-to-day instructional continuity; and teachers challenge students with questions and assignments that promote academic rigor, depth of understanding, and development of higher-order thinking and problem-solving skills. **State University** The school has strong instructional leadership. Renewal

Benchmark 1E

Elements that are generally present include:

Instructional Leadership

- the school's leadership establishes an environment of high expectations for student achievement;
- the school's leadership establishes an environment of high expectations for teacher performance (in content knowledge, pedagogical skills and student achievement);
- the school's instructional leaders have in place a comprehensive and on-going system for evaluating teacher quality and effectiveness;
- the school's instructional leaders, based on classroom visits and other available data, provide direct ongoing support, such as critical feedback, coaching and/or modeling, to teachers in their classrooms;
- the school's leadership provides structured opportunities, resources and guidance for teachers to plan the delivery of the instructional program within and across grade levels as well as within disciplines or content areas;
- the school's instructional leaders organize a coherent and sustained professional development program that meets the needs of both the school and individual teachers;
- the school's leadership ensures that the school is responding to the needs of atrisk students and maximizing their achievement to the greatest extent possible in
 the regular education program using in-class resources and/or pull-out services
 and programs where necessary; and
- the school's leadership conducts regular reviews and evaluations of the school's academic program and makes necessary changes to ensure that the school is effectively working to achieve academic standards defined by the State University Renewal Benchmarks in the areas of assessment, curriculum, pedagogy, student order and discipline, and professional development.

State University Renewal Benchmark 1F

The school is demonstrably effective in helping students who are struggling academically.

At-Risk Students

Elements that are generally present include:

- the school deploys sufficient resources to provide academic interventions that address the range of students' needs;
- all regular education teachers, as well as specialists, utilize effective strategies to support students within the regular education program;
- the school provides sufficient training, resources, and support to all teachers and specialists with regard to meeting the needs of at-risk students;
- the school has clearly defined screening procedures for identifying at-risk students and providing them with the appropriate interventions, and a common understanding among all teachers of these procedures;
- all regular education teachers demonstrate a working knowledge of students' Individualized Education Program goals and instructional strategies for meeting those goals;
- the school provides sufficient time and support for on-going coordination between regular and special education teachers, as well as other program specialists and service providers; and
- the school monitors the performance of student participation in support services using well-defined school-wide criteria, and regularly evaluates the effectiveness of its intervention programs.

State University Renewal Benchmark 1G Student Order & Discipline	The school promotes a culture of learning and scholarship. Elements that are generally present include: the school has a documented discipline policy that is consistently applied; classroom management techniques and daily routines have established a culture in which learning is valued and clearly evident; low-level misbehavior is not being tolerated, e.g., students are not being allowed to disrupt or opt-out of learning during class time; and throughout the school, a safe and orderly environment has been established.
State University Renewal Benchmark 1H	The school's professional development program assists teachers in meeting student academic needs and school goals by addressing identified shortcomings in teachers' pedagogical skills and content knowledge.
Professional Development	Elements that are generally present include: the school provides sufficient time, personnel, materials and funding to support a comprehensive and sustained professional development program; the content of the professional development program dovetails with the school's mission, curriculum, and instructional programs; annual professional development plans derive from a data-driven needs-assessment and staff interests;
	 professional development places a high priority on achieving the State University Renewal Benchmarks and the school's Accountability Plan goals; teachers are involved in setting short-term and long-term goals for their own professional development activities; the school provides effective, ongoing support and training tailored to teachers' varying levels of expertise and instructional responsibilities; the school provides training to assist all teachers to meet the needs of students with disabilities, English language learners and other students at-risk of academic failure; and
	the professional development program is systematically evaluated to determine its effectiveness at meeting stated goals.

	Renewal Question 2
	Is the School an Effective, Viable Organization?
Evidence Category	State University Renewal Benchmarks

State University The school is faithful to its mission and has implemented the key design Renewal elements included in its charter. Benchmark 2A Mission & Key Design Elements that are generally present include: Elements stakeholders are aware of the mission: the school has implemented its key design elements in pursuit of its mission; and the school meets or comes close to meeting any non-academic goals contained in its Accountability Plan. State University Parents/guardians and students are satisfied with the school. Renewal Elements that are generally present include: Benchmark 2B the school has a process and procedures for evaluation of parent satisfaction with the school: the great majority of parents with students enrolled at the school have strong **Parents & Students** positive attitudes about it; few parents pursue grievances at the school board level or outside the school; a large number of parents seek entrance to the school; parents with students enrolled keep their children enrolled year-to-year; and the school maintains a high rate of daily student attendance. **State University** The school has established a well-functioning organizational structure with staff, Renewal systems, and procedures that allow the school to carry out its academic Benchmark 2C program. Elements that are generally present include: Organizational the school demonstrates effective management of day-to-day operations; Capacity staff scheduling is internally consistent and supportive of the school's mission; the school has established clear priorities, objectives and benchmarks for achieving its mission and Accountability Plan goals, and a process for their regular review and revision; the school has allocated sufficient resources in support of achieving its goals; the roles and responsibilities of the school's leadership and staff members are clearly defined; the school has an organizational structure that provides clear lines for accountability; the school's management has successfully recruited, hired and retained key personnel, and made appropriate decisions about removing ineffective staff members when warranted; the school maintains an adequate student enrollment and has effective procedures for recruiting new students to the school; and the school's management and board have demonstrated effective communication practices with the school community including school staff, parents/guardians and students.

State University Renewal Benchmark 2D

The school board has worked effectively to achieve the school's mission and provide oversight to the total educational program.

Elements that are generally present include:

Board Oversight

- the school board has adequate skills and expertise, as well as adequate meeting time to provide rigorous oversight of the school;
- the school board (or a committee thereof) understands the core business of the school—student achievement—in sufficient depth to permit the board to provide effective oversight;
- the school board has set clear long-term and short-term goals and expectations for meeting those goals, and communicates them to the school's management and leaders;
- the school board has received regular written reports from the school leadership on academic performance and progress, financial stability and organizational capacity;
- the school board has conducted regular evaluations of the school's management (including school leaders who report to the board, supervisors from management organization(s), and/or partner organizations that provide services to the school), and has acted on the results where such evaluations demonstrated shortcomings in performance;
- where there have been demonstrable deficiencies in the school's academic, organizational or fiscal performance, the school board has taken effective action to correct those deficiencies and put in place benchmarks for determining if the deficiencies are being corrected in a timely fashion;
- the school board has not made financial or organizational decisions that have materially impeded the school in fulfilling its mission; and
- the school board conducts on-going assessment and evaluation of its own effectiveness in providing adequate school oversight, and pursues opportunities for further governance training and development.

State University Renewal Benchmark 2E

The board has implemented and maintained appropriate policies, systems and processes, and has abided by them.

Governance

Elements that are generally present include:

- the school board has established a set of priorities that are in line with the school's goals and mission and has effectively worked to design and implement a system to achieve those priorities;
- the school board has in place a process for recruiting and selecting new members in order to maintain adequate skill sets and expertise for effective governance and structural continuity;
- the school board has implemented a comprehensive and strict conflict of interest
 policy (and/or code of ethics)—consistent with those set forth in the charter—and
 consistently abided by them through the term of the charter;
- the school board has generally avoided creating conflicts of interest where
 possible; where not possible, the school has managed those conflicts of interest in
 a clear and transparent manner;
- the school board has instituted a process for dealing with complaints (and such

- policy is consistent with that set forth in the charter), has made that policy clear to all stakeholders, and has followed that policy including acting in a timely fashion on any such complaints; the school board has abided by its by-laws including, but not limited to, provisions regarding trustee elections, removals and filling of vacancies;
- the school board and its committees hold meetings in accordance with the Open Meetings Law, and minutes are recorded for all meetings including executive sessions and, as appropriate, committee meetings; and
- the school board has in place a set of board and school policies that are reviewed regularly and updated as needed.

State University Renewal Benchmark 2F

The school has substantially complied with applicable laws, rules and regulations and the provisions of its charter.

Elements that are generally present include:

- during its charter period, the school has compiled 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:
- at the time of renewal, the school is in substantial compliance with the terms of its charter and applicable laws, rules and regulations;
- over the charter period, the school has abided by the terms of its monitoring plan;
- the school has designed and put in place effective systems and controls to ensure that legal and charter requirements were and are met; and
- the school has an active and ongoing relationship with in-house or independent legal counsel that reviews relevant policies, documents, transactions and incidents and makes recommendations and handles other legal matters as needed.

Legal Requirements