



# THE SUNY CHARTER SCHOOLS INSTITUTE

*SCHOOL EVALUATION REPORT*  
**TAPESTRY CHARTER SCHOOL**

*VISIT DATE: APRIL 26 – 27, 2023*

*REPORT DATE: JULY 6, 2023*

*SUNY Charter Schools Institute*

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**Charter Schools Institute**  
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 Tapestry Charter School (“Tapestry”) on April 26-27, 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.





## CHARTER BACKGROUND

# TAPESTRY CHARTER SCHOOL

111 Great Arrow Avenue, Buffalo, NY | Grades: K-4 | Buffalo Schools District  
65 Great Arrow Avenue, Buffalo, NY | Grades: 5-12 | Buffalo Schools District

The State University of New York Board of Trustees (the “SUNY Trustees”) approved the original charter for (“Tapestry”) on March 27, 2001. The charter opened in fall 2001, serving 105 students in Kindergarten – 4<sup>th</sup> grade.

**MISSION**  
*To educate and inspire a diverse community of Kindergarten – 12<sup>th</sup> grade learners by engaging them in rigorous real world learning experiences, which prioritize intellectual, social, and emotional growth.*

### CURRENT CHARTER

Serves: Kindergarten – 12<sup>th</sup>  
Chartered Enrollment:  
1,090  
Charter Expiration:  
April 24, 2026

### KEY DESIGN ELEMENTS

Rigorous academics with real world learning;	+
Student, family, and staff member wellness;	+
Comprehensive, ongoing staff member development;	+
Family and community engagement; and,	+
Shared leadership.	+

## EXECUTIVE SUMMARY

### EXECUTIVE SUMMARY

Tapestry leaders understand the challenges presented by COVID-19 and the spring 2022 state assessment results, which primarily focus on gaps in student learning, hiring, and enrollment. The school has strategies in place to address these urgent challenges. For instance, leaders revised the organizational chart to add a chief academic officer (“CAO”) who works closely with principals and teachers to ensure the academic program is coherent and supported by systems, protocols, and procedures necessary to raise student achievement and improve teacher effectiveness. The board charged a newly created chief operating officer (“COO”) position with strengthening school operations with a particular focus on recruiting and retaining a diverse talent pool that is reflective of the student population the school serves.

To strengthen alignment across Kindergarten – 8<sup>th</sup> grade, leaders are now implementing the EL Education (“EL”) curriculum in English language arts (“ELA”) at the elementary level in addition to the middle school level. During this charter term, leaders and teachers recognized that the school was collecting many student achievement data points from a large number of assessments, but teachers did not have the time to fully process and analyze the amount of data the school collected. Therefore, leaders, in partnership with teachers, worked to streamline the number of assessments administered across the school to allow improved support systems for teachers in the areas of data analysis and how to identify and employ data driven instructional strategies to support student learning. One area leaders recognize a need for further improvement is to provide more intentional and consistent high quality professional development to teachers including differentiated learning for veteran and novice teachers.

Tapestry’s board uses a well-defined committee structure to govern the school. School leadership presented the changes to the organizational structure with clear justification for new positions, and the board approved. The board members and leaders crafted a shared vision to make diversity, equity, and inclusion a priority in the school because they believe that this is critical to helping Tapestry reinforce and leverage the rich diversity within the school to help realize its mission and vision.

## ACADEMIC PERFORMANCE

### 2021-22 CHARTER PERFORMANCE REVIEW

At the beginning of the Accountability Period,<sup>1</sup> 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 Summary to each school detailing the school's progress toward meeting its Accountability Plan goals. Because the Act requires charters be held "accountable for meeting measurable student achievement results"<sup>2</sup> and states the educational programs at a charter school must "meet or exceed the student performance standards adopted by the board of regents"<sup>3</sup> 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](#).

In 2021-22, the first year with credible scores from the state's assessments suitable for analysis following the cancellation of the exams in 2019-20, Tapestry posted low baseline achievement on the measures comprising its ELA and mathematics Accountability Plan goals at the elementary and middle school levels. The charter must improve from this baseline performance level to make the strongest case for earning a renewal in 2025-26.

In 2021-22, 34% of Tapestry's students enrolled in at least their second year scored at or above proficiency on the state's ELA assessment for students in 3<sup>rd</sup> – 8<sup>th</sup> grade. The charter scored 10 percentage points higher than the district but far below its absolute performance target of 75%. In comparison to schools throughout the state enrolling similar proportions of economically disadvantaged students, Tapestry performed lower than expected with an effect size of -0.46. Starting from this low baseline, Tapestry must demonstrate improvement on its ELA scores to make a strong and compelling case for its next renewal in fall 2025.

Last year, only 18% of students enrolled in at least their second year scored at or above proficiency on the state's mathematics assessment for students in 3<sup>rd</sup> – 8<sup>th</sup> grade. The charter scored three percentage points higher than the district but 57 percentage points lower than the absolute target of 75% proficiency. Further, 59% of students scored at Level 1, the lowest possible level indicating performance far below grade level expectations. In comparison to schools across the state enrolling similar concentrations of economically disadvantaged students, Tapestry's effect size of -0.75 demonstrates the charter performed lower than expected to a large degree.

At the high school level, Tapestry met its graduation and college preparation goals in 2021-22. That year, 91% of its 2018 Total Cohort graduated after four years surpassing the absolute target by 16 percentage points and the district's four year graduation rate by 12 percentage points. The charter demonstrates college preparation for its graduates through earning the Regents diploma with advanced designation and through passing a college level course. In 2021-22, 81% of the 74 graduates in the 2018 Cohort achieved either distinction.

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).

## ACADEMIC PERFORMANCE

### TAPESTRY 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.

100

Target: 75

50

0

**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.

2

1

0

-1

Target: 0.3

**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**.

60

Target: 50

40

Test Year	Comp Grades	District %	Charter %
2018	3-8	23	45
2019	3-8	25	44
2020	N/A	N/A	N/A
2021	N/A	N/A	N/A
2022	3-8	24	34

Test Year	Test Grades	Effect Size
2018	3-8	-0.09
2019	3-8	-0.31
2020	N/A	N/A
2021	N/A	N/A
2022	3-8	-0.46

Test Year	Charter Mean Growth
2018	50.3
2019	46.3
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.

100

Target: 75

50

0

**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.

2

1

0

-1

Target: 0.3

**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**.

60

Target: 50

40

Test Year	Comp Grades	District %	Charter %
2018	3-8	21	40
2019	3-8	21	40
2020	N/A	N/A	N/A
2021	N/A	N/A	N/A
2022	3-8	15	18

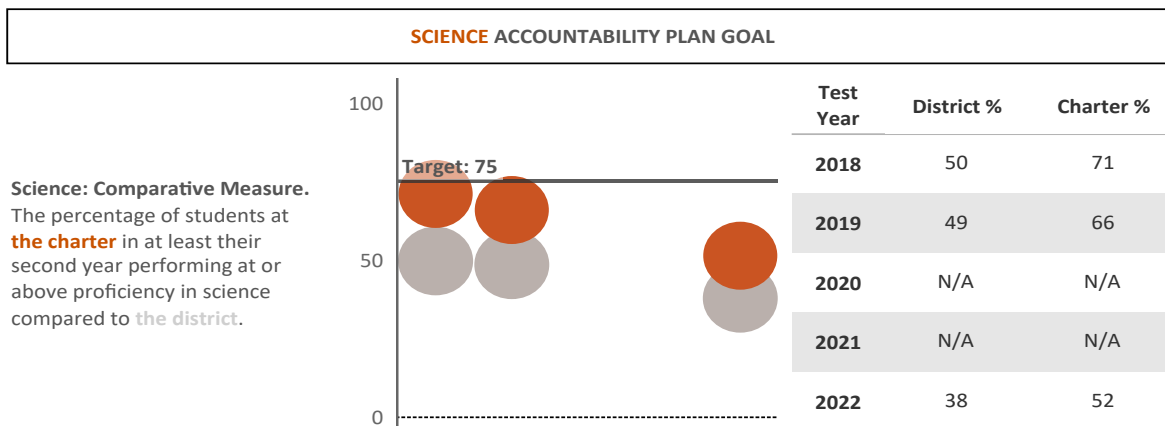
Test Year	Test Grades	Effect Size
2018	3-8	-0.20
2019	3-8	-0.56
2020	N/A	N/A
2021	N/A	N/A
2022	3-8	-0.75

Test Year	Charter Mean Growth
2018	46.9
2019	47.6
2020	N/A
2021	N/A
2022	N/A



## ACADEMIC PERFORMANCE

### TAPESTRY CHARTER SCHOOL

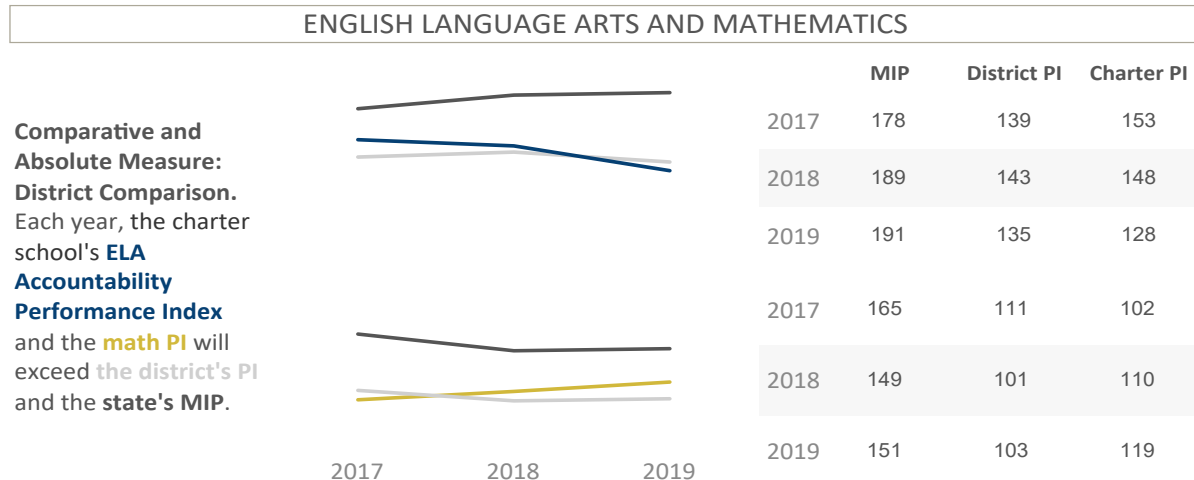
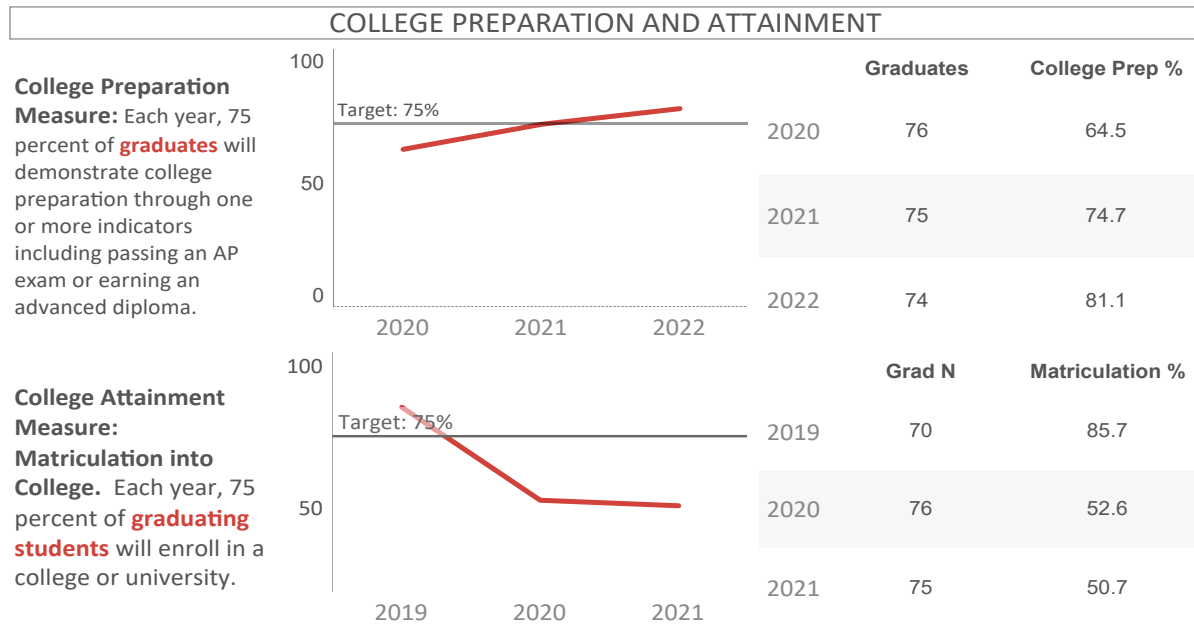
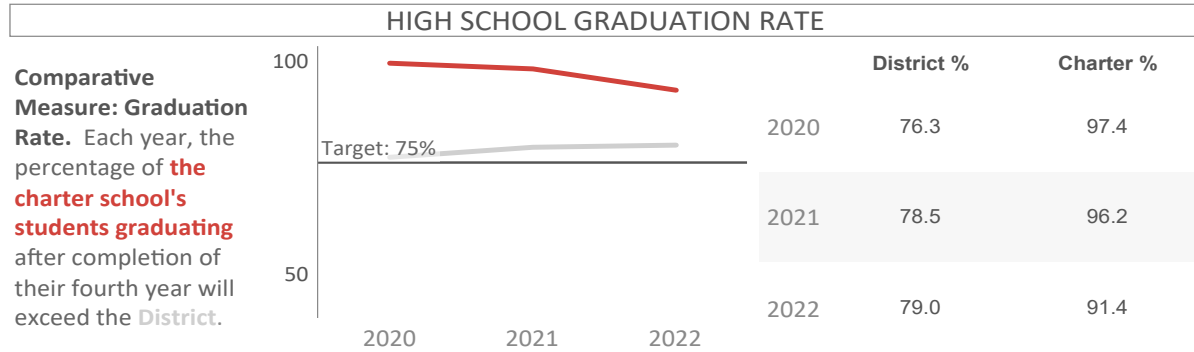


SPECIAL POPULATIONS PERFORMANCE*			
	2018	2019	2022
Students with Disabilities Enrollment	122	117	164
Tested on State Exam	50	48	55
Charter Percent Proficient on ELA Exam	12.0	10.4	14.5
District Percent Proficient	8.5	8.7	7.2
ELL Enrollment	16	21	21
Tested on NYSESLAT Exam	16	13	18
Charter Percent 'Commanding' or Making Progress	50.0	7.7	16.7

\* 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".

## ACADEMIC PERFORMANCE

### TAPESTRY CHARTER SCHOOL



## BENCHMARK SUMMARY

### QUALITATIVE BENCHMARK ANALYSIS

The SUNY Renewal Benchmarks, grounded in the body of research from the Center for Urban Studies at Harvard University,<sup>4</sup> 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.<sup>5</sup>

#### ASSESSMENT

Tapestry made adjustments to its assessment system to improve instructional effectiveness. Leaders and teachers reflected that the overall number of assessments and timing of their administration led to having too much data to process, analyze, and create action plans in a timely fashion. Therefore, Tapestry made strategic adjustments to its testing calendar to better support teachers with data analysis and data driven instructional practices. For Kindergarten – 8<sup>th</sup> grade, the school administers the NWEA MAP (“MAP”) assessment for ELA and mathematics three times per year. At the elementary level, the program shifted away from school-created interim assessments and focused on administering the EL curriculum’s mid- and end-module assessments. The elementary program also uses the Fountas and Pinnell Benchmark Assessment System (“F&P”) to gather student reading levels. At the middle and high school programs, the school shifted its interim assessment suite to provide a shorter, standards-focused assessment toward the beginning of the year, followed by a New York State mock 5<sup>th</sup> – 8<sup>th</sup> grade assessment or mock Regents assessment at the midpoint in the school year. The suite of assessments provides teachers and leaders with a substantial amount of data to analyze and drive instructional decisions.

Tapestry recognizes mathematics as an area for improvement. Given performance on the spring 2022 state mathematics exam, leaders adjusted the program to better meet the needs of students. These efforts include holding dedicated data meetings for mathematics, adjusting scope and sequence documents to allow time for both remediation and grade level content, and establishing a schoolwide mathematics action plan to closely monitor performance across the school. Leaders work with teachers to review data and create classroom-level action plans. Specifically in mathematics, teachers review performance to determine ways to spiral standards that are still deficient while maintaining grade level curricular programs. Given the implementation of new programs, Tapestry has the opportunity to closely review student performance results at the end of the 2022-23 school year to understand the effectiveness of shifts to the assessment program.

#### CURRICULUM

For the 2022-23 school year, Tapestry implements the EL curriculum for the elementary grades in ELA to better align with the established middle and high school curricular programs after conducting a thorough audit and review process. Leaders proposed these changes due to reflection on students’ experience shifting from the

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](#).

## BENCHMARK SUMMARY

elementary program to the middle school program and wanted to ensure that the student experience is more seamless in regard to academic expectations. The framework is rigorous and aligned to state standards across grades. The school implements EngageNY modules for mathematics and Amplify for science, and currently uses a variety of different resources to support social studies instruction. Teachers know what to teach and have autonomy to make adjustments to pacing in response to identified gaps in students' foundational skills and content knowledge. Instructional leaders implement remediation days in the pacing guides in order to address student misconceptions and reteach standards with which students have struggled each week. Coaches support inexperienced teachers as needed in adapting the curricular materials for daily lesson plans. Most teachers plan purposeful and focused lessons using a consistent lesson plan template. While planning documents demonstrate effective planning strategies, teachers' lesson execution varies across the program. The school does not have clear expectations for teachers' intellectual preparation of lessons and leaders do not consistently implement the EL learning protocols, which provide a pre-module deep dive in the content. The curricular programs provide robust resources for teachers, and instructional leaders acknowledge that teachers do not consistently deliver the curriculum with fidelity. The school has the opportunity to set clear expectations for teacher adaptation of the available materials and evaluate the effectiveness of the framework and supporting tools throughout the remainder of the charter term.

### PEDAGOGY

While most teachers deliver purposeful lessons with objectives aligned to the school's curriculum, the integration of effective checks for understanding and higher order thinking questions is inconsistent across the academic program. Generally, classroom environments are warm and welcoming, and there is evidence of positive teacher and student relationships through the school building embedded throughout the school's "Crew" character development and support model. Teachers design lesson materials and student activities to enhance student engagement through the use of several standard EL protocols, including partner and group work stations, gallery walks, and tools to support student discourse. However, teachers do not consistently check for understanding throughout implementation of these engagement protocols or hold all students accountable for participating in the cognitive lift of the learning task. In several lessons, the small group discussions resulted in some students copying the response of a peer, and teachers did not circulate strategically to ensure that all students in the group had attained a full understanding of the content.

Teachers do not consistently define clear criteria for student success. For example, during a lesson that included several higher order thinking opportunities, most students responded to the written questions with rote, low level answers and were not encouraged to expand their analysis to the quality established by the New York State standards for the grade and content level. Lesson plans indicate that teachers are cognizant of the needs of students with Individualized Education Programs ("IEPs"), ELLs, and students below grade level, but instruction does not consistently include authentic differentiation strategies to support the needs of diverse learners. Similarly, while several classrooms implement an integrated co-teaching ("ICT") model, the Institute did not observe a wide range of co-teaching techniques that demonstrates teachers' responsiveness to differentiating needs for students.

## BENCHMARK SUMMARY

### INSTRUCTIONAL LEADERSHIP

With over 20 years in operation, Tapestry’s instructional leadership is growing and evolving to better meet changing needs of students. School leaders revised the organizational chart and hired a CAO who is responsible for ensuring that there is strong alignment among all three program levels and that the Kindergarten – 12<sup>th</sup> grade academic program is coherent and cohesive. School leaders are working to establish a data-informed culture among staff members at Tapestry. Teachers and leaders report meeting regularly to review a variety of student performance data, both qualitative and quantitative, to make decisions, adjust instruction, refine the curriculum scope and sequence, and establish policies and procedures designed to improve teacher effectiveness and student outcomes. The school continues to improve instructional quality across the school. For example, leaders build time for co-planning in ICT teachers’ schedules and hired mathematics, literacy, and instructional coaches who serve as thought partners and provide in-the-moment support to teachers.

Instructional leaders at Tapestry understand the need to be more intentional and consistent about providing quality professional development to teachers. Specifically, leaders recognize that the need to provide differentiated training and support to both novice and veteran teachers in the school. There is general agreement that the fundamentals of effective teaching and assessment should be a focus of professional learning across the school.

### AT-RISK PROGRAM

Tapestry has an effective program to support the educational needs of at-risk students. Leaders at Tapestry have clear processes in place for identifying at-risk students. Leaders work closely with teachers to help implement the school’s Response to Intervention (“RTI”) process that is designed to provide students struggling academically with the intensive instructional support to achieve academic success. Students who do not perform well on local assessments are selected for Tier 2 or Tier 3 interventions. Students who do not make sufficient academic progress after receiving Tier 3 interventions are referred to the Committee on Special Education for an evaluation. Leaders work to ensure that students with IEPs with academic needs are assigned to ICT classrooms to get intensive, differentiated instructional support.

School leaders at Tapestry administers the Home Language Survey and the New York State Identification Test for English Language Learners (“NYSITELL”) if they suspect that a student may need English language services. They also administer the New York State English as a Second Language Achievement Test (“NYSESLAT”) at the end of the year to monitor student progress toward English language acquisition and proficiency. Students receive either push-in or pull out ELL instructional support. Teachers are aware of ELL’s language proficiency status and report a desire to have more professional development on how to provide specific supports to ELLs in general education classes.

Although leaders at Tapestry are intentional about putting the appropriate structures and resources in place to address students’ diverse learning needs, leaders have not provided consistent, high quality professional development to build teachers’ capacity to provide thoughtful and research-based differentiated instructional support to all students. Class visits show that while teachers, especially those in the elementary and middle



## BENCHMARK SUMMARY

school, create opportunities for students to participate in a variety of engaging and hands-on activities that align to the EL curriculum, teachers do not customize delivery of instruction to address students' diverse learning needs. Teachers in the ICT classes primarily rely on the co-teaching model "one teach, one assist" rather than leverage other co-teaching models based on student needs. Leaders recognize a need to provide more training to teachers on how to effectively implement a wide range of co-teaching models.

### ORGANIZATIONAL CAPACITY

Tapestry's revised organizational chart, which includes the addition of a CAO, COO, and director of diversity, equity, and inclusion ("DDEI"), is designed to create better cohesion and coherence across the organization to ensure the effective operations of the organization. The CAO, a veteran staff member who was promoted to the role, is charged with making sure that there is sound alignment of the academic program among all three programs and leaders allocate the resources needed to facilitate high quality curriculum and instruction across the school. The COO, another veteran Tapestry staff member, works closely with the executive director, CAO, and DDEI to ensure that Tapestry continues to take a strategic approach to school operations and finances. Teachers and other members of the school community understand the rationale for the revision to the school's organizational structure and are clear about the decision-making process.

School leaders are proactive about recruiting students. In addition to leveraging the school's brand, leaders work with local organizations to share information about the school to new families. One specific challenge to the recruitment of students in general, is the transportation provided by Buffalo City Schools District. The district provides bussing, but the times allocated for charters can lead to students arriving much earlier or much later than the actual start time of the school day. Tapestry continues to work with the district because the school wants to find a viable solution for recruiting more ELLs, which can not be accomplished with the current schedule provided by the district and where concentration of ELLs live within the city, which causes students from those communities to get on a bus prior to 6:30AM. In addition to monitoring student enrollment to ensure that they are meeting their targets, school leaders allocate the resources necessary to support quality teaching and learning, and work closely with the DDEI to revise job descriptions so that they can build a diverse talent pool that they can draw upon to fill open positions.

The Compass team, which includes the executive director, CAO, COO, and principals, collect and analyze a variety of qualitative and quantitative data to evaluate the efficacy of the academic program and school operations in addition to identifying opportunities to reinforce the school's organizational and financial viability. Leaders mentioned that having the ability to rent the school's new sports field is one way in which the school would be able to diversify Tapestry's revenue stream for the school.

## BENCHMARK SUMMARY

### BOARD OVERSIGHT & GOVERNANCE

Tapestry's board works effectively to monitor the school's progress toward meeting the school's Accountability Plan goals. Board members have a wide range of skillsets that provide a well-balanced governance view of the school. The board uses a committee structure, which was reconfigured during this charter term, to gather information and report out to the larger board meetings. The board appreciates the level of detail and information the CAO shares about the academic program and sees this as a crucial position in mitigating interrupted instruction by ensuring aligned efforts across the academic program. The board relies heavily on one member to be an expert with the data and having a full grasp on the academic program, which makes it difficult for all members to be fully aware specific successes and challenges across the academic program. The board recognizes a need to improve student proficiency on state exams, but does not have quantified goals for the years ahead.

In other areas, the board is firmly up to date and clear on priorities and long term planning. The board prioritized social-emotional learning at the beginning of returning to in-person learning and acknowledges this priority may have hindered efforts to get students to experience rigorous learning. Recognizing this during the 2022-23 school year has allowed the board to prioritize academic rigor and programming. The board sees strengthening the current program and diversifying its revenue streams as its main long term goals. The board engaged in building a brand new track and field and will support the surrounding community with its facilities. However, the board also recognizes consistent cost increases in its operating environment and works to ensure it is building a sustainable financial model. It also hopes to strengthen its alumni network to encourage involvement. Notably, one board member is a Tapestry graduate.

The board has also charged leadership with focusing on diversity, equity, and inclusion. It made the decision to add a DDEI, who works to support across the organization with diversity, equity, and inclusion efforts including, but not limited to, hiring practices and professional learning,

Tapestry

# Ax

## APPENDICES

PAGES Ax 1-16

**CO<sup>A</sup>**  
CHARTER  
OVERVIEW

PAGE Ax 1

**SB<sup>B</sup>**  
SUNY RENEWAL  
BENCHMARKS

PAGE Ax 5

## TAPESTRY CHARTER SCHOOL BOARD OF TRUSTEES<sup>1</sup>

CHAIR	TRUSTEES
Alfred J. Wright	Shai Arnold
VICE CHAIR	Betsy Behrend
Luanne Firestone	Lindsay Dotson
SECRETARY	Javeena A. Edwards
Joshua Feinstein	Joyelle Hackett
TREASURER	Jeremy Hazelton
Daniel Pyne	Taylor Hunter
	Patrick Lewis
	Hilary Lochte
	Daniel Robertson
	Caroline Taggart

## CHARTER LEADERS

### EXECUTIVE DIRECTOR

*Eric Klapper, Executive Director (November 2016 to Present)*

*Joy Pepper, Executive Director (2001-02 to October 2016)*

### ELEMENTARY

*Melissa Rivera, Principal (2022-23 to Present)*

*Jennifer Pangborn, Principal (December 2016 to 2021-22)*

*Anthony Riccio, Interim Principal (September 2016 to December 2016)*

### MIDDLE SCHOOL

*Lindsay Lee, Principal (July 2018 to Present)*

*Lindsay Lee, Interim Principal (May 2018 to July 2018)*

*Dan DiCamillo, 6-12 Principal (February 2017 to May 2018)*

*Ben Willis, Interim 6-12 Principal (August 2016 to February 2017)*

### HIGH SCHOOL

*Sara Hilligas, Principal (2018-19 to Present)*

*Frederick Carstens, Co-Principal (2018-19 to 2022-23)*

*Sara Hilligas, Interim Principal (May 2018 to July 2018)*

*Dan DiCamillo, Principal (August 2016 to May 2018)*

## CHARTER CHARACTERISTICS

SCHOOL YEAR	CHARTERED ENROLLMENT	ACTUAL ENROLLMENT <sup>2</sup>	ACTUAL AS A PERCENTAGE OF CHARTERED ENROLLMENT	GRADES SERVED
2018-19	1,070	951	89%	K-12
2019-20	1,070	978	91%	K-12
2020-21	1,070	1,077	101%	K-12
2021-22	1,090	1,094	100%	K-12
2022-23	1,090	870	80%	K-12

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

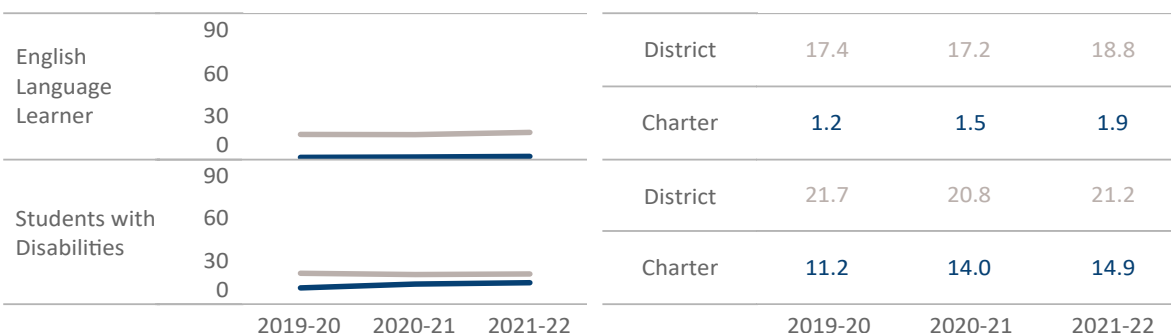
2. Source: Institute's Official Enrollment Binder. (Figures may differ slightly from New York State Report Cards, depending on date of data collection.)



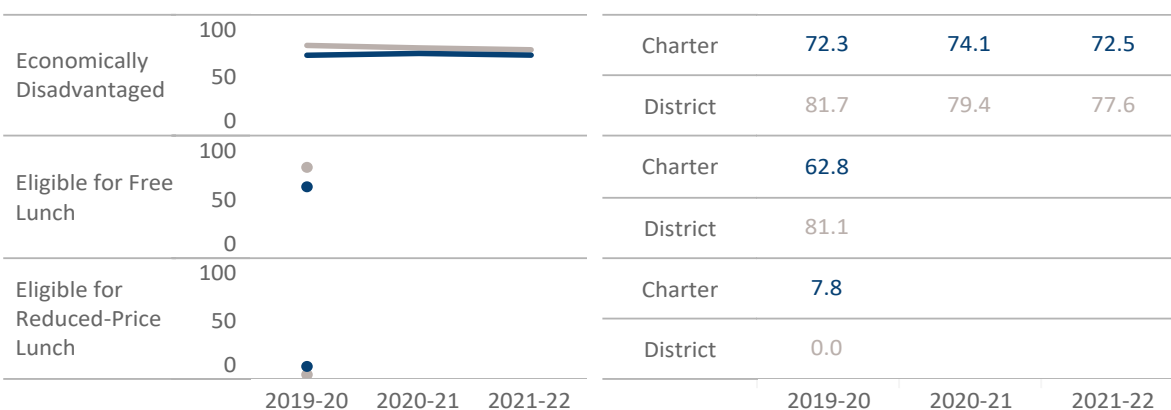
## Tapestry Charter School

## Buffalo City School District

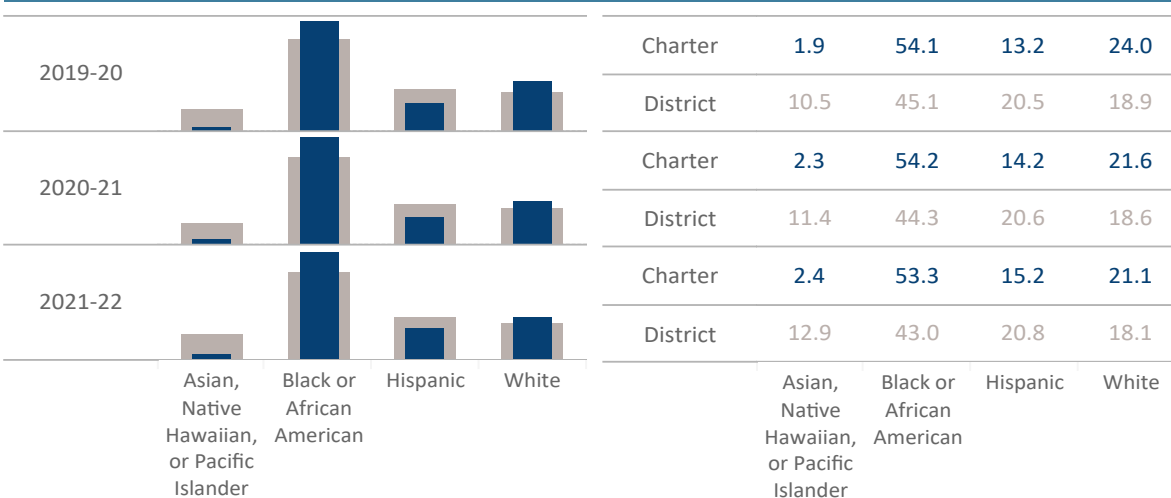
### Student Demographics: Special Populations



### Student Demographics: Free/Reduced Lunch



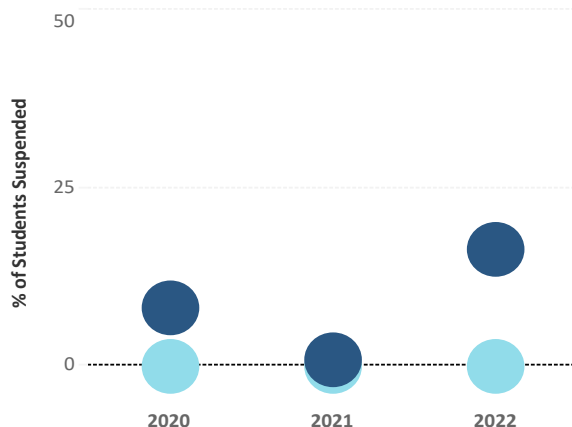
### Student Demographics: Race/Ethnicity



\* 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.



## Tapestry Charter School



## Buffalo City School District

ISS Rate      OSS Rate

2020	0.0	8.2
2021	0.0	0.9
2022	0.0	16.4

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



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

2020      2021      2022

**8      1      8**

## Tapestry Charter School's Enrollment and Retention Status: 2021-22

			Target	Charter
enrollment	economically disadvantaged		82.6	72.5
	English language learners		12	1.9
	students with disabilities		19.8	14.9
retention	economically disadvantaged		94.8	90.2
	English language learners		94.1	93.8
	students with disabilities		94.6	88.7

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

## APPENDIX A: CHARTER SCHOOL OVERVIEW

### CHARTER SCHOOL VISIT HISTORY

SCHOOL YEAR	VISIT TYPE	DATE
2001-02	First Year Visit	May 29, 2002
2002-03	Evaluation Visit	May 15, 2003
2003-04	Evaluation Visit	February 10 – 11, 2004
2005-06	Initial Renewal Visit	June 16 – 19, 2005
2008-09	Evaluation Visit	May 5, 2009
2009-10	Subsequent Renewal Visit	April 10, 2010
2011-12	Evaluation Visit	December 13 – 14, 2011
2014-15	Subsequent Renewal Visit	March 24 – 25, 2015
2020-21	Subsequent Renewal Visit	November 30 – December 4, 2020
2022-23	Evaluation Visit	April 26 – 27, 2023

### CONDUCT OF THE VISIT

DATE(S) OF REVIEW	EVALUATION TEAM MEMBERS	TITLE
April 26 – 27, 2023	Aretha Miller	External Consultant
	Katy Clayton	School Evaluation Analyst
	Andrew Kile	Managing Director of School Evaluation

### CHARTER CYCLE CONTEXT

CHARTER TERM	ACCOUNTABILITY PERIOD	ANTICIPATED RENEWAL VISIT
5 <sup>th</sup>	Fourth Year of a Five Year Accountability Period	Fall 2024



### VERSION 5.0, MAY 2012

#### INTRODUCTION

The State University of New York Charter Renewal Benchmarks<sup>1</sup> (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.

*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.*



- 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.



**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;



- 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.

## 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;

- 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.
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## **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.

### 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.



### 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.

#### **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.

